



Minnesota Pollution Control Agency

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January 15, 2018

The Honorable Dan Fabian, Chair
Environment and Natural Resources Policy and
Finance Committee
359 State Office Building
St. Paul, MN 55155

The Honorable Rick Hansen
DFL Lead, Environment and Natural Resources
Policy and Finance Committee
Ranking Minority Member
2235 MN Senate Building
St. Paul, MN 55155

The Honorable Carrie Ruud, Chair
Environment and Natural Resources Policy and
Legacy Finance Committee
3233 MN Senate Building
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The Honorable Chris Eaton
Environment and Natural Resources Policy and
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2403 MN Senate Building
St. Paul, MN 55155

The Honorable David Osmek, Chair
Energy and Utilities Finance and Policy Committee
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The Honorable John Marty
Energy and Utilities Finance and Policy Committee
Ranking Minority Member
2401 MN Senate Building
St. Paul, MN 55155

The Honorable Bill Ingebrigtsen, Chair
3207 Minnesota Senate Building
House Environment and Natural Resources Policy
and Finance Committee
St. Paul, MN 55155

The Honorable Pat Garofalo, Chair
Job Growth and Energy Affordability Policy and
Finance
485 State Office Building
St. Paul, MN 55155

The Honorable David Tomassoni, Chair
Ranking Minority Member, Environment and
Natural Resources Finance Committee
2235 Minnesota Senate Building
St. Paul, MN 55155

The Honorable Jean Wagenius
Job Growth and Energy Affordability Policy and
Finance Committee
251 State Office Building
St. Paul, MN 55155

RE: NPDES/SDS Permits, Water Quality Standards and Municipalities as Required by Minn.
Stat. § 115.44, subd. 9

Dear Committee Chairs and Ranking Minority Members:

In keeping with the provisions of Minnesota Statute § 115.44, Subdivision 9, the enclosed report identifies and describes municipal wastewater treatment system permits, water quality standards, and implementation efforts to address water quality-based effluent limits. 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. We hope this fosters awareness of and engagement in Minnesota Pollution Control Agency (MPCA) initiatives that may affect municipalities, as well as promote coordination and dialogue between the MPCA and municipalities on permitting and water quality improvement efforts.

Committee Chairs and Ranking Minority Members

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January 15, 2018

They can also be found at <https://www.pca.state.mn.us/about-mpca/legislative-reports>

If you have any questions regarding this report, please contact me at 651-757-2031.

Sincerely,

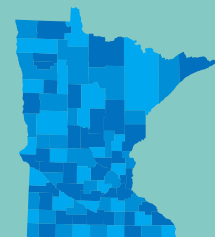
A handwritten signature in cursive script that reads "Greta Gauthier".

Greta Gauthier
Legislative Director

GG:cbg

January 2018

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



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.

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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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MPCA reports are printed on 100% post-consumer recycled content paper manufactured without chlorine or chlorine derivatives.

Total staff time: 80 hrs.	\$2,672.00
Production/duplication	\$ 36.91
Total	<u>\$2,708.91</u>

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This report is available in alternative formats upon request, and online at www.pca.state.mn.us.

Document number: lrwq-wwprm-1sy18

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.
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Acronyms

CWRF	Clean Water Revolving Fund
EPA	United States Environmental Protection Agency
NPDES	National Pollutant Discharge Elimination System
RES	River Eutrophication Standards
SDS	State Disposal System
WIF	Wastewater Infrastructure Fund
WWTP	Wastewater Treatment Plant
WQS	Water Quality Standard

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).

Changes in pre-public notice and public notice requirements

Legislation passed by the Minnesota Legislature in 2017 established new procedural review and public notice timeframes for NPDES/SDS permits issued to publicly owned wastewater treatment facilities (Minn. Stat. 115.542). In accordance with Minn. Stat. 115.542, the MPCA must provide a municipal Permittee with 30 days to complete a pre-public notice review of the draft NPDES/SDS permit prior to placing the draft permit on public notice. Once the 30-day pre-public notice review is complete, the draft NPDES/SDS permit is required to be placed on public notice for 60 days.

Prior to adoption of Minn. Stat. 115.542 NPDES/SDS permits issued to publicly owned wastewater treatment facilities were not required to be provided to Permittee's prior to public notice but MPCA's standard practice was to provide a copy of the draft permit to Permittee's for review prior to placing the permit on public notice. In addition, prior to adoption of Minn. Stat. 115.542 all draft permits were required to be placed on public notice for 30 days in accordance with Minn. R. 7001.0100.

Municipal permittees

In 2017, the MPCA reissued or modified **74** permits. Of that number, **36** discharge to soil, groundwater, and **38** discharge to surface water. Permits that allow discharge to surface waters receive National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) permits and are subject to this Report.

Of the **38** permits that discharge to a surface water, **26** were either administratively corrected or received minor modifications. There are no new effluent limits associated with these permits. Many of these changes were needed to correct errors because of the new Tempo database and electronic Discharge Monitoring Reports (eDMRs). Others were to update dates associated with reports. These permits are listed below:

- Climax WWTP
- Alexandria Lakes Area Sanitary District
- Cokato WWTP
- Cormorant Park Place Estates
- Delft Sanitary District WWTP
- Detroit Lakes WWTP
- Gilbert WWTP
- Grey Eagle WWTP
- Hallmark Terrace WWTP
- Harris WWTP
- Hope - Somerset Township WWTP
- Kasson WWTP
- Laketown Community WWTP
- MDNR Father Hennepin State Park

- Milaca WWTP
- MNDOT - Heath Creek Rest Area
- Morgan WWTP
- Sacred Heart WWTP
- Saint Francis WWTP
- Shafer WWTP
- Stewartville WWTP
- Western Lake Superior Sanitary District
- Willmar WWTF
- Willow River WWTP
- Winsted WWTP
- Saint Cloud WWTP

The **eight** permits listed below did receive new effluent limits. However, the limits were **not** based on new standards.

- Hawley WWTP
- Isle WWTP
- Loretto WWTP
- Medford WWTP
- New Ulm WWTP
- Nichols Wastewater Ponds
- Redwood Falls WWTP
- Tracy WWTP

The **four** permits listed below received new effluent limits due to a new water quality standards(WQS).

- Belgrade WWTP
- Grove City WWTP
- Madelia WWTP
- MRVPUC WWTP

With the development of the River Eutrophication Standards, MPCA began taking an innovative watershed approach to setting phosphorus limits in 2014-2015. During the evaluation of the need for limits, the MPCA considers phosphorus from all major sources concurrently. Where multiple sources discharge upstream of a waters with excess algae, 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. It ensures each facility is doing its “fair share” to deal with its own pollution. Out of a total of 80 watersheds statewide, 26 phosphorus watershed reviews are complete, an additional 10 are in progress and 3 have updates pending. The MPCA plans to complete the remaining reviews by the end of 2018 and the will be available at www.pca.state.mn.us/water/watersheds.

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 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.

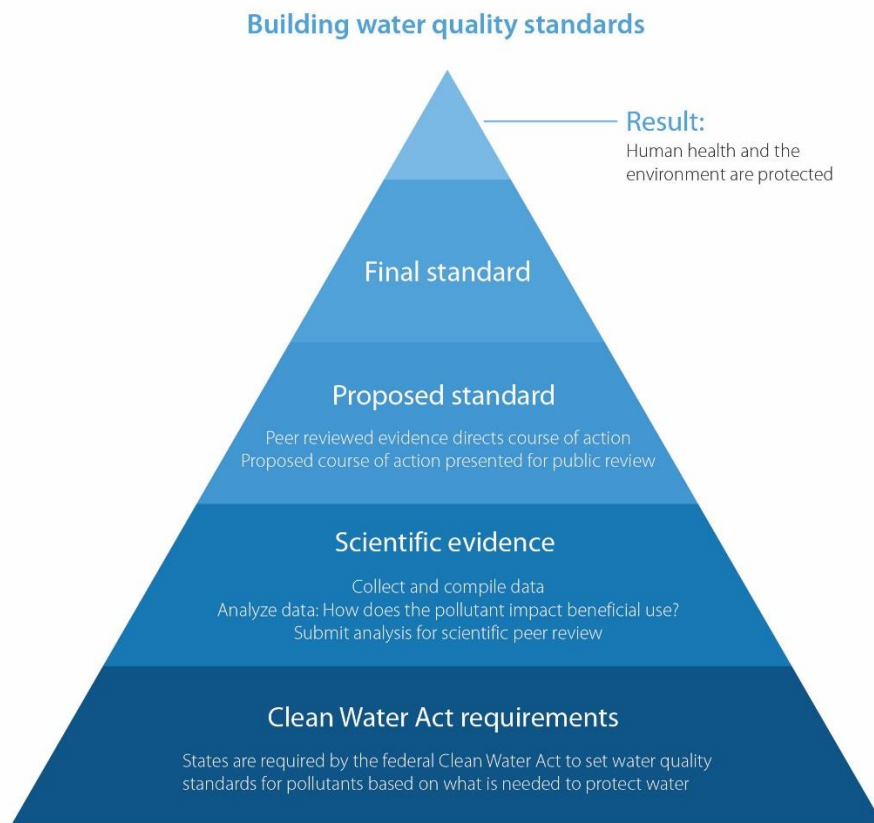
To convey the breadth and status of this work, the MPCA developed an inventory of standards efforts (<https://www.pca.state.mn.us/sites/default/files/wq-s6-35.pdf>). The inventory groups water quality standard projects by rulemaking status and priority, and provides a summary of project status. In 2015, 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 2017

Peer review of new or revised water quality standards

On June 14, 2017, Commissioner John Linc Stine issued an agency-wide directive to employ peer review when developing new or revised water quality standards. While MPCA always and consistently relies on peer-reviewed science in the development of environmental standards, there continues to be confusion about the role of peer review in standards development.

The following graphic shows the basic standards development process.



Stakeholders have expressed interest in having an opportunity to comment on documents that undergo scientific peer review and to suggest review questions. To address the ongoing confusion and to bring increased transparency to the MPCA's scientific peer review process, Commissioner Stine directed MPCA staff to supplement existing peer review efforts in developing new or revised numeric water quality standards for all rules initiated after the date of this memo as follows:

- Every new or revised numeric water quality standard must be supported by a technical support document (TSD) that provides the scientific basis for the proposed standard and that has undergone external, scientific peer review.
- Every TSD developed by the MPCA must be released in draft form for public comment prior to peer review and prior to finalizing the TSD.
- Public notice and information about the peer review should occur through the Request for Comments (RFC) published at the start of the water quality standards rulemaking process.
- The purpose of the external peer review is to evaluate if the TSD and proposed standard is based on sound scientific knowledge, methods, and practices. It should be conducted as follows:
 - The external peer review must be conducted according to the guidance in the most recent edition of the EPA's Peer Review Handbook.
 - Peer reviewers must not have participated in developing the scientific basis of the standard.
 - The type of review and the number of expert reviewers should depend on the nature of the science underlying the standard. Where the MPCA is developing significant new science or science that expands significantly beyond current documented scientific practices or principles, a panel review should be used.
- In response to the findings of the external peer review, the draft TSD should be revised, as appropriate.

Tiered Aquatic Life Uses

In 2017, the MPCA adopted what is known as the Tiered Aquatic Life Use (TALU) framework, which focuses on the biology of surface waters. TALU provides a mechanism to monitor and set realistic expectations for the biological community that waters should support, especially where legal modifications (such as channelization) prevent waters from supporting the kind of biological community that would otherwise be expected. The adopted TALU framework enhances the protection and maintenance of the biological, chemical and physical integrity of state water resources by achieving the following goals:

- **Establishes biological water quality standards.** This provides a more direct method to measure and protect biological health and identify water quality problems that chemical measurements alone might miss.
- **Protects high-quality water resources.** The framework provides a mechanism to identify and protect high quality water resources.
- **Provides a mechanism to appropriately and reasonably classify and assess modified water resources.** These include channelized streams and ditches.
- **Improves stressor identification.** This provides greater accuracy when assessing the stressors that impact Minnesota's water resources.

TALU does not modify chemical water quality standards. As a result, TALU is not expected to affect effluent limits for wastewater dischargers.

River Eutrophication Standards, phosphorus wasteload allocations (WLAs), and limits in NPDES/SDS permits

In 2014 Minnesota adopted numeric river eutrophication standards (RES), which are designed to protect rivers and streams from impacts due to excess phosphorus loading. New effluent limits, to protect for RES, are included in permits during reissuance if needed. MPCA's process for setting limits is designed to achieve water quality standards without overregulating.

There are two primary factors that go into developing phosphorus effluent limits: the wasteload allocation (WLA) and facility performance. The WLA is the maximum allowable phosphorus load to protect rivers from the effects of phosphorous enrichment, and it is expressed as a long-term, multi-summer average. If there are multiple dischargers upstream of a water that has excess algae, the WLA is split among wastewater permittees.

Facility performance includes the variability of phosphorus concentrations in effluent and the extent to which a facility is operated under a limit to remain in compliance. An analysis of 15 years of phosphorous discharge records across the state shows that facilities discharged at some margin below the limit to ensure compliance with their permits. This margin between limit and performance allows MPCA to express effluent limits for phosphorus at a level higher than the WLA and yet still achieve the environmental goal.

In 2017, MPCA began including phosphorus WLAs in select permits along with effluent limits for RES. The effluent limit remains the enforceable permit condition, but now the MPCA adds the WLA to better facilitate planning and engineering. During reissuance, MPCA will review effluent data to verify attainment of the WLA. By including the WLA, the facility operator and engineer are provided with more clear long-term average effluent expectations.

Triennial Standards Review: MPCA's proposed water quality standards work plan, 2018-2020

Under the Clean Water Act, the MPCA is required to regularly conduct a review of water quality standards and ask for public input on what water quality standards work the Agency should undertake. The last such triennial standards review was conducted in 2013. The public notice for the 2017 triennial standards review was published on November 27, 2017 and the public comment period is ongoing. A public meeting was held on January 10, 2018 and comments are being accepted through February 9, 2018.

As part of the current triennial standards review, the MPCA has evaluated the priorities laid out in the previous triennial standards review, the work completed since that review, program needs, and new information on pollutant effects such as the national ambient water quality criteria developed by EPA. In addition, the agency has evaluated its resources for developing standards and has developed a draft list of projects to prioritize over the next three to five years. The list includes both projects currently in the rulemaking process and others not yet ready for rulemaking.

As part of the 2017 triennial standards review, the MPCA is specifically requesting comments on the projects included in the work plan below. The workplan is provided in a new format, designed to provide clearer communication about the agency's water quality standards development plans and estimated timelines. The MPCA hopes this provides additional clarity to interested parties and commenters.

Table 1: Draft Proposed work plan with estimated timelines (may change based on public input)

	Water Quality Standards - Active development		Water Quality Standards – Initial evaluation and Development		
	Group 1: Current and Active		Group 2: In Technical Development		Group 3: Tracking and Evaluation
Development stage	1A: Rulemaking	1B: Pre-rulemaking development	2A: Technical Review	2B: Technical Information Outstanding	
Estimated timeline	Minimum 18 months in this development stage	Two to three years in this development stage	One to two years in this development stage	Will not move into next phase before 2020	Limited progress expected before 2020
	Sulfate - Wild Rice	Use Class 1 (drinking water)	Use Classes 2A (cold water)/2B (cool and warm water)	Nitrate – aquatic life	Perfluoro-octanesulfonic acid (PFOS) in fish tissue – human health
	Use Classes 3 (industrial) and 4 (agriculture and wildlife)	<i>E. coli</i> - human health and recreation		Ammonia – aquatic life	
				Sulfate – aquatic life Chloride – aquatic life	

Group 1A projects

Group 1A projects have an estimated timeline for adoption into state law. In this stage, the MPCA is responding to changes needed due to peer review (where applicable), finalizing the technical support document, and developing the Statement of Need and Reasonableness and final rule language. The need for peer review will affect the rulemaking timeline.

Sulfate - wild rice

MPCA is proposing changes to the water quality standards designed to protect wild rice from adverse impacts caused by sulfate pollution. A Notice of Intent to Adopt was published in the State Register on August 21, 2017, and a series of public hearings on the proposed rules were held in October and November 2017.

Use Classes 3 (industrial) and 4 (agriculture and wildlife)

Revision of the water quality standards and approach for protecting Class 3 (industrial) and Class 4 (agriculture and wildlife) use classes, which are as follows:

- Class 3 water quality standards protect waters for general industrial purposes, industrial cooling, and materials transport.
- Class 4A water quality standards protect source waters used for irrigation purposes.
- Class 4B water quality standards protect waters used for livestock and by wildlife.

Finalization of the technical approach for revising use class designations and associated water quality standards continues. MPCA anticipates the draft technical support document will be out for public comment in 2018, and may go through peer review.

Group 1B projects

In Group 1B projects, the agency is preparing supporting documentation and has a basic concept of the rule language. Draft technical support documents for new or revised numeric standards go through an initial public comment period and independent peer review process. When the document is complete, enough for peer review, generally in two to three years, the pre-rulemaking (Group 1B) projects will move into formal rulemaking.

Group 2A projects

Group 2A projects have all the information needed from outside the MPCA to evaluate how the standard will address environmental or programmatic concerns and to assess the resources needed to promulgate and implement the standard. To move the project into Group 1, the agency must determine if it is able to accommodate the standard-development work in addition to its regular permitting and related work. Group 2A projects are likely to move into Group 1B within one to two years.

Group 2B projects

Group 2B projects are in initial technical development, which may involve reviewing scientific literature or Minnesota-specific data, designing and undertaking studies, or reviewing and refining an EPA criteria document. Group 2B projects need additional information to complete technical development and move to Group 2A; such information may not be available for months or years.

Group 3 projects

The MPCA has not started developing Group 3 projects, because of missing technical information, a lack of capacity, or both. Group 3 projects may remain in Group 3 without significant progress into regulatory development throughout the three-year triennial period.

The Triennial Standards Review covers more information than the workplan presented here. Additional information can be found at: <https://www.pca.state.mn.us/water/2017-triennial-standards-review>.

Innovative approaches

This section highlights innovative approaches implemented by the MPCA, the Legislature, and municipalities, in collaboration with stakeholders and interested parties, to develop and achieve permit requirements in a cost-effective manner..

Community wastewater infrastructure improvement assistance

In 2017, the Municipal Wastewater Program, in partnership with others, coordinated about \$130 million in financial assistance to 62 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, and Iron Range Resources and Rehabilitation Board.
- U.S. Department of Agriculture Rural Development Program
- Iron Range Resources and Rehabilitation Board

Governor. Mark Dayton's water initiative has significantly increased state financial assistance for wastewater projects across the state.

The 2017 Legislature approved a proposal for MPCA and PFA to increase grant percentages from 50 percent of eligible project costs to 80 percent, and increased the grant amount from \$3 million to \$7 million.

Protection of Water Quality Investment Act in holding pattern

The 2017 Legislature directed the MPCA to modify its permitting rules in a manner that aimed to provide municipal wastewater dischargers with certainty that the value of investment committed to treat wastewater to current standards would be fully utilized before additional capital investment is required.

The MPCA proceeded with the legislative-specified good cause exempt rulemaking. However, an administrative law judge disapproved the proposed rules after concerns were raised about the implementation of the rule possibly conflicting with the federal Clean Water Act.

The agency is considering whether to appeal the decision.

Chloride Work Group

Chloride in water is a tough problem to solve. It takes only a small amount – 1 teaspoon per 5 gallons of water – to pollute water permanently. At high concentrations, chloride can harm fish and plant life. Chloride in Minnesota waters comes from two main sources: road salt and water softeners. Much of Minnesota has hard water, prompting people to use water softeners. These softeners require salt, a form of chloride, to operate. In most cities, these softeners discharge to the municipal wastewater treatment plant.

Wastewater treatment plants are not designed to remove chloride in the wastewater and it ends up discharging to the receiving water, usually a river in Minnesota. In fact, there is no easy and affordable way to remove chloride in wastewater. It would require reverse osmosis, the same process used to produce water for laboratory use, which is technically difficult as well as costly.

According to data, reducing chloride in wastewater means reducing salt used in softeners. That means cities either:

- Provide water already softened, thus eliminating the need for individual softeners; or
- Implement a program to put high-efficiency softeners into use.

These options can be expensive and require large-scale change by residents and businesses. In addition, in most cases, the use of high-efficiency softeners alone will not result in sufficient reductions to meet the chloride water quality standard.

The MPCA has required several WWTPs to monitor for chloride in their discharge since 2009. So far, more than 100 WWTPs have the potential to contribute levels of chloride higher than the standard, which is 230 mg/L for chronic levels and 860 mg/L for acute levels.

The common approach to reduce pollutants in wastewater discharge is to assign a limit on pollutants in facility permits, requiring WWTPs to invest in new processes and/or equipment. In the case of chloride, however, the agency knew there was no simple solution.

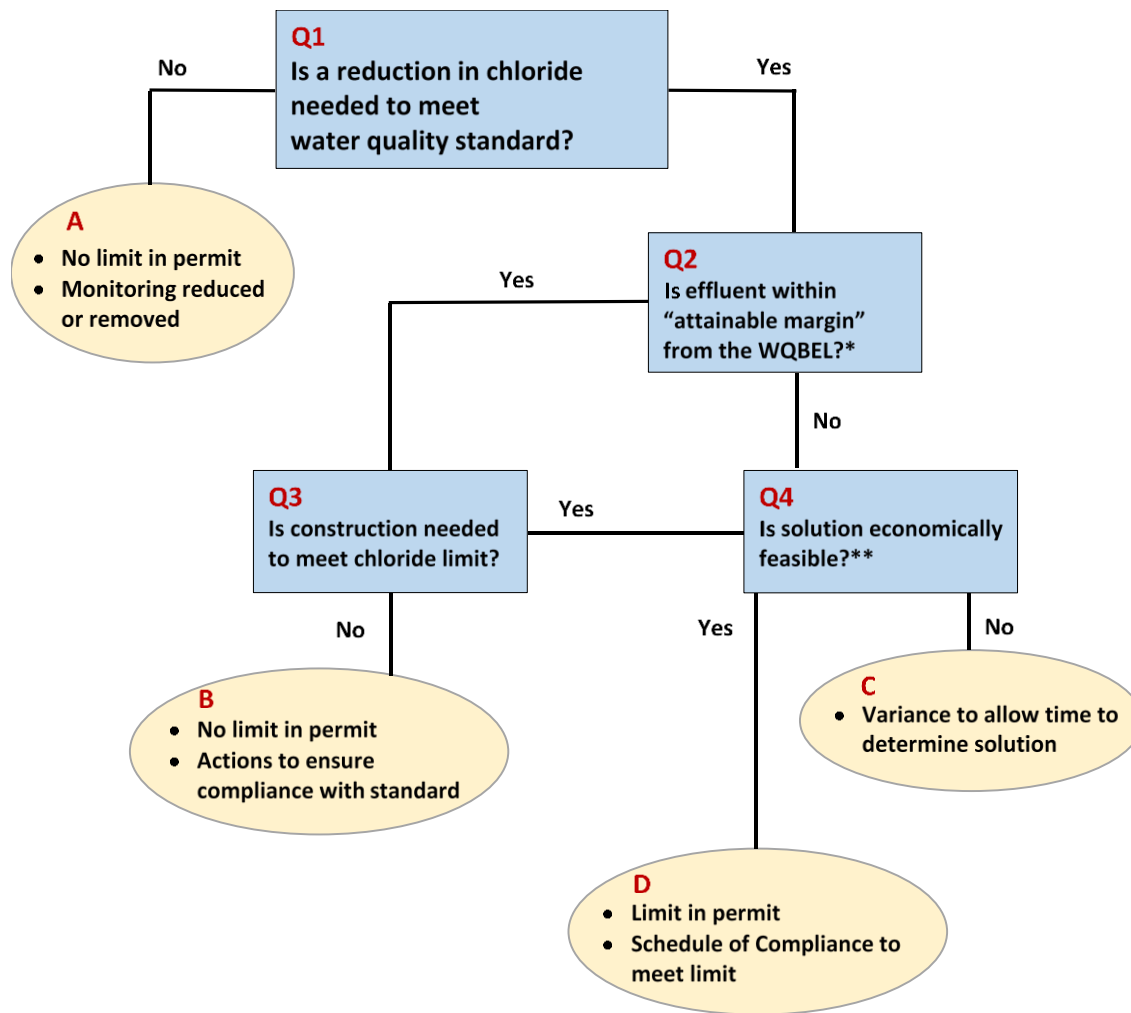
Commissioner Stine directed staff to form a work group of community representatives to study the chloride problem and make recommendations on how to implement the standard in municipal wastewater permits (the agency will continue to work on chloride in industrial wastewater permits on a case-by-case basis)

The group consisted of eight municipal representatives and two consultant engineers. Members met several times from December 2016-April 2017. The group, represented by David Lane, environmental manager for the Rochester Water Reclamation Plant, made its [recommendations](#) to the MPCA Advisory Committee on April 18:

- MPCA should use a decision tree developed by the group to decide whether the agency will assign a chloride limit in a WWTP's permit with an associated schedule of compliance, or consider a variance.

Factors in the decision tree include:

- Is a reduction in chloride needed?
 - Is the facility close to meeting the standard?
 - Is construction needed to meet the chloride limit?
 - Is the solution economically feasible?
- Table 2: Chloride permitting decision tree



* "Attainable margin" may be defined by a numeric threshold or by the anticipated chloride reduction due to implementation of specific actions. See the Chloride Work Group Policy Proposal for details.

** Municipalities may use the MPCA variance screening calculator tool to evaluate the economic feasibility of a solution. See the policy proposal for details.

For chloride variances, the MPCA has developed a streamlined application tool that includes a spreadsheet calculator to determine affordability. The Chloride Work Group recommended:

- The agency allow municipalities to use the spreadsheet tool.
- Allow variances when the cost of treatment is too high (which is consistent with the Clean Water Act and state rules).
- Waive the current variance application fee of \$10,850 if municipalities use the streamlined application for a chloride variance.
- Reissue variances when permits are reissued if there are no changes in the economics of the solution.
- Use best management practices to minimize a plant's contribution to chloride concentrations. For example, some plants may be able to use different products for phosphorus removal that will also lead to lower chloride concentrations.

- Plants with variances must still have alternative limits in their permits to prevent “backsliding” or making chloride levels higher.

The same recommendations would apply to other salty parameters.

Work group members also said the process was a good one, and the MPCA should consider similar work groups in the future. They noted the collaboration among the agency, communities and consultants in working on the chloride problem together. They also liked that MPCA permit writers and effluent limit reviewers were involved in the process.

Commissioner Stine directed staff to implement the recommendations, which MPCA staff have now done in full, including developing the streamlined variance approach and eliminating the application fee.

Permit listening sessions continued in 2017

In 2016, the MPCA conducted a series of listening sessions with permittees. The listening sessions were intended to help MPCA learn gauge how well NPDES permittees understood their permits and the MPCA’s process for developing permits and permit conditions, and how MPCA can communicate better with permittees. The agency continued that effort on January 10, 2017 in Eveleth with an additional session specific to Iron Range municipalities. Thirteen representatives from the region attended, 10 wastewater operators and three city administrators.

The primary interest of the group was to learn more about their NPDES permits, but some also wanted to know more about negotiable parts of their permits and about public notice requirements and permit process. Still, for some, primary concerns expressed were that the MPCA did not appear to understand the cost of permit compliance for municipalities and effluent limits being moving targets.

All who attended agreed that they learned something new about their permits. However, when asked if they felt their permit limits will result in cleaner waters of the state, one strongly agreed, six agreed, three were neutral, and one strongly disagreed. When asked if they felt their concerns were heard by MPCA staff, four strongly agreed, five agreed, and two remained neutral. The MPCA is continuing to strive to ensure that permittees know that we value their input and strive to be responsive to their concerns.

Minnesota River Basin meeting in Mankato

About 105 wastewater operators, community representatives and state agency staff took part in a meeting at Mankato’s government center on Oct. 18, 2017. The city of Mankato co-hosted this meeting, called “What’s coming down the pipe” with the MPCA in October 2017.

The purpose of the meeting was to share information and ideas. MPCA staff talked about how the agency is implementing the river eutrophication and chloride water quality standards. Agency staff also talked about the future of water quality trading and availability of state financial assistance.

Audience members asked about variances to standards, the impact of agriculture and other nonpoint sources on water quality, and how the MPCA is determining new effluent limits in permits. They also had a chance to visit with MPCA staff individually or in small groups about issues specific to their permits.

The information presented to wastewater permit holders at the Oct. 18 meeting in Mankato was clear and useful, according to participants who responded to a survey about the meeting.

Survey results include:

- 96.2% of respondents said the information on river eutrophication standards was “clear” or “very clear” and 84.6% said it was “very useful” or “somewhat useful”
- 77.0% of respondents said the information on water quality trading was “clear” or “very clear” and 76.9% said it was “very useful” or “somewhat useful”
- 92.3% of respondents said the information on chloride standards was “clear” or “very clear” and the same percentage said it was “very useful” or “somewhat useful”
- 80.7% of respondents said the information on state financial resources was “clear” or “very clear” and 76.9% said it was “very useful” or “somewhat useful”

Most respondents said they felt they had the opportunity to have their concerns heard with 57.7% marking “yes” to this statement, 34.6% marking “somewhat,” and the remainder “not applicable.”

A majority also said the MPCA was respectful of their opinions with 80.8% marking “yes” to this statement, 7.7% marking “somewhat,” and the remainder “not applicable.”

Some respondents noted room for improvement in communicating changes in permit conditions and the process for reissuing permits. The MPCA is working to make these improvements.

Overall, the MPCA believes the meeting was productive for all parties, and most participants appear to agree. “The meeting was very useful and informative. It was put on very well. I wish there was more time. I hope you do this again. Also, it is nice that your speakers pointed out good things and progress made. It is nice to hear the positive as well,” one participant wrote in the survey form.

Other outreach efforts

Other outreach activities in 2017 included 33 individual site visits by the municipal liaison, to:

- Listen to concerns of NPDES permittees
- Provide clarity on permitting questions
- Provide greater explanation on RES
- Offer permitting options where compliance was not immediately attainable,
- Review funding solutions

The municipal liaison gave presentations to the Minnesota Wastewater Operators Association in February and September, Minnesota Rural Water Association annual conference in March; MPCA Annual Wastewater Conference in March; and the Conference on the Environment in November informing permittees about programs within the MPCA and to and field questions from interested parties.

In response to input from municipalities at listening sessions, the MPCA also:

- Increased the frequency of the On Point newsletter for permit holders from quarterly to monthly
- Clarified questions on monthly and annual monitoring reports completed by permittees
- Started mailing additional copies of correspondence to ensure both the mayor and wastewater operator received documents
- Provided more data and tools to access data to facilitate reporting and planning

In addition, the MPCA presented on water quality standards and wastewater programs to the Legislative Water Commission during the summer and fall of 2017.

Municipal needs covered in this report and chances for input

The 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 2018 report. Please submit comments to Joel Peck, municipal liaison for the MPCA, at 651-757-2202 or joel.peck@state.mn.us.