

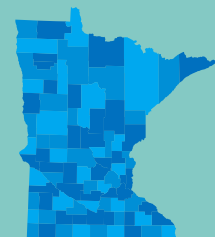
Permitting efficiency

August 1, 2019

Environmental Permitting Minnesota Pollution Control Agency's Annual Permitting Efficiency Report



m MINNESOTA POLLUTION
CONTROL AGENCY



Legislative charge

Minn. Stat. § 116.03, subd. 2b.

Report to Legislature

The commissioner shall prepare an annual permitting efficiency report that includes statistics on meeting the goal in paragraph (a) and the criteria for Tier 1 and Tier 2 by permit categories. The report is due August 1 each year. For permit applications that have not met the goal, the report must state the reasons for not meeting the goal. In stating the reasons for not meeting the goal, the commissioner shall separately identify delays caused by the responsiveness of the proposer, lack of staff, scientific or technical disagreements, or the level of public engagement. The report must specify the number of days from initial submission of the application to the day of determination that the application is complete. The report must aggregate the data for the year and assess whether program or system changes are necessary to achieve the goal. The report must be posted on the agency's website and submitted to the governor and the chairs and ranking minority members of the House of Representatives and Senate committees having jurisdiction over environment policy and finance.

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Minnesota Pollution Control Agency

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

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Executive summary

(Current review period: July 1, 2018 – June 30, 2019)

	2016	2017	2018	2019
Priority permits that met goal	97%	94%	97%	99%
Non-priority permits that met goal	40%	46%	63%	61%
All permits that met goal	74%	87%	93%	93%

Our overall permitting efficiency continues to be very good – especially on the most important (also called priority) permits. These permits represent economic growth and new job opportunities for the state.

We received about a 4% decrease in the total number of applications from last year. Most of these were for industrial and construction stormwater permits.

We returned slightly fewer applications (as incomplete) this review period compared to last year. The overall return rate continues to be very low (~1%) which indicates that application quality is very good.

Program Summary

The MPCA manages more than 15,000 air, water, and land permits. Most permits are issued for a period of five years although a few permit types are issued for 10-year terms or are non-expiring. Permits are issued to businesses, governmental units, and individuals, and cover a wide range of facilities and activities. Permits are required for the construction and operation of facilities that discharge or emit (or have the potential to discharge or emit) specifically defined pollutants and for certain activities.

Permitting goals were first established in 2011 under executive order and legislation. The law has been modified a few times over the years and now includes two tiers with different timeliness goals. Tier 1 permits are permits that do not require individualized actions or public comment periods. For example, facilities that require coverage under the construction stormwater general permit. These have a 90-day issuance goal. Tier 2 permits are permits that require individualized actions or a public comment period. For example, a large mining or manufacturing facility permit. These have a 150-day issuance goal. Tier 2 publicly owned wastewater treatment facilities have an issuance goal of 210 days. The list of permit types in each tier can be found in Appendix A of this report.

Background

This report results from concerns expressed about the length and uncertainty associated with regulatory processes, including environmental review and permitting. In 2010, the Legislature directed the Office of the Legislative Auditor (OLA) to review the environmental review and permitting programs of the Environmental Quality Board, the MPCA, the Minnesota Department of Natural Resources (DNR) and local units of government. A range of businesses and elected officials suggested that the structure and process of permitting at that time was negatively affecting the business climate and economic growth in Minnesota. Permitting and environmental review process reform was identified by those raising concerns as an important step for Minnesota state government to facilitate job creation in the state.

To address these concerns, Governor Dayton issued Executive Order 11-4 (EO11-04) on January 24, 2011. The Executive Order requires MPCA and DNR to adopt a 150-day goal for reaching a permit decision following the determination by the appropriate agency that the permit application is complete. This same goal is reiterated in Session Laws 2011, Chapter 4, codified in Minn. Stat. § 116.03 except that the law requires that the 150-day goal and indicates that the time begins upon the initial submission of an application instead of when the application is determined to be complete. This law is referred to as the Permitting Efficiency Law, and requires, among other things, the MPCA to determine, within 30 business days of receipt of a permit application, whether the application is substantially complete, and to inform the applicant of the deficiencies if the application is incomplete. The Permitting Efficiency Law also required the MPCA and the DNR to submit semi-annual reports to the Governor and the Legislature on August 1 and February 1 of each year.

In 2014, the Permitting Efficiency Law was amended, changing the requirement to only annual reports due on August 1 to the Governor and the Legislature. The Law also established Tier 1 and Tier 2 permit categories. Tier 1 permits are permits that do not require individualized actions or public comment periods. These permit types have a 90-day issuance goal. Tier 2 permits are permits that require individualized actions or a public comment period, and have a 150-day issuance goal. The list of permit types in each tier can be found in Appendix A.

In 2017, the law was amended to remove the reporting requirement for Tier 1 permits and to set a new goal of 210 days for Tier 2 publicly owned wastewater treatment facilities.

MPCA's environmental permitting programs

The MPCA manages more than 15,000 air, water, and land permits. Most permits are issued for a period of five years although a few permit types are issued for 10-year terms or are non-expiring. Permits are issued to businesses, governmental units, and individuals, and cover a wide range of facilities and activities. Permits are required for the construction and operation of facilities that discharge or emit (or have the potential to discharge or emit) specifically defined pollutants and for certain activities.

With few exceptions, the MPCA almost exclusively implements federal regulatory programs on behalf of the U.S. Environmental Protection Agency (EPA), as the EPA's delegated authority. Without this delegation, many of the current permittees we serve and new applicants would be required to seek necessary permits directly from the EPA, Region 5, in Chicago. While many of the requirements of these environmental permits are mandated by federal regulations, state laws and the MPCA's permitting processes often allow for increased flexibility and customer assistance, which results in greater overall efficiency than otherwise achievable working directly with the EPA.

Most permits must undergo a rigorous public participation process to ensure that interested parties (from citizens to other governmental units) have an opportunity to provide input. This process requires a public notice of the draft permit – usually 30 days – and may include public meetings or hearings. The MPCA must review, consider and respond to all written comments received and revise draft permits, where appropriate. While this public participation process provides valuable public insight to the final permit, it may also add time to the permit review and issuance process.

To reduce time when possible, the MPCA uses a variety of permits to provide flexibility as well as to meet the needs of the regulated community. The use of general and registration permits allows the MPCA to cover similar facilities under a standardized permit (standardized requirements). For most general permits, there is only one statewide public notice period; therefore, applicants that qualify do not need a public notice for their specific facility. Facilities that qualify for a general permit receive their permit much faster than those needing an individual (facility-specific) permit.

Types of permits issued by the MPCA include:

Air permits – Individual, general, and registration permits for facilities that emit defined air pollutants such as particulate matter, sulfur and nitrogen compounds, and carbon monoxide. Permitted facilities include power plants, refineries, manufacturing plants and dry cleaners.

Water permits – Individual and general permits for facilities that discharge pollutants such as treated sewage, sediment, residual chlorine, and phosphorus to surface and groundwater of the state.

Permitted facilities include animal feedlots, municipal and industrial wastewater treatment facilities, stormwater conveyance systems from construction projects, industrial sites and municipalities, and extensions of sewer systems.

Land permits – Individual and general permits for facility operation to prevent or minimize the release of pollutants such as landfill leachate, oil, gas, and other hazardous materials. Permitted facilities include municipal and industrial waste transfer stations and landfills, facilities that have below and aboveground storage tanks, and hazardous waste storage and treatment facilities.

Priority permits

The mission of the MPCA's permitting programs is to protect and improve the environment and enhance human health as well as support jobs and economic development in the state. To achieve this goal, it is the MPCA's policy to prioritize permits for new or expanding projects, which typically represent new economic opportunities and jobs. These "priority" permits are defined as needing some sort of construction at the site. A new permit or the significant modification of an existing permit is required for these projects. Often these are the most technically complex and controversial projects and, therefore, require more time to issue. The remaining projects (called "non-priority" permits) are generally routine permit re-issuances that do not require substantive changes or involve construction and, therefore, are typically less time-sensitive to permittees. Permittees covered under these existing permits are allowed to continue to operate until MPCA staff can be assigned to work on the permit reissuance.

Improvement efforts

The MPCA continues to upgrade its permitting data management system called Tempo. During the current period, the MPCA added new on-line features, which will allow permittees to update and submit permitting data electronically. These changes will allow for ease of access and faster submittals for the permittees and will speed up the over-all permitting process. We will continue to implement more of these on-line services in future years.

The MPCA also continues to implement continuous improvement projects that will streamline permitting processes, provide flexibility and increase transparency for communities while still ensuring the highest level of health and environmental protection. For example, we initiated a project in 2018 to work with the permitted industries, the city and communities in the area of North Minneapolis to reduce overall air pollution from industrial and non-industrial sources. Working with EPA, the state of Oregon and community groups, we have designed a session that provides training to interested community members on how to submit effective public comments to draft permits. We also recently participated in the development of a report that recommends actions that will reduce barriers to community engagement in the air permitting process. We believe these efforts will increase public engagement as well as provide more "actionable" comments for the agency to consider.

Data

Table 1: Tier 1 and Tier 2 permit applications from July 1, 2018 - June 30, 2019

Tier	Priority	Received	Withdrawn	Returned	Determined Complete	Issued (total)	Issued (within goal)	Issued (missed goal)	% issued within goal*	Pending (total)	Pending (still within goal)	Pending (missed goal)
1	Non-priority	171	5	3	163	128	122	6	88%	35	25	10
	Priority	2390	3	0	2387	2356	2348	8	99%	31	25	6
2	Non-priority	491	9	27	455	182	166	16	50%	273	120	153
	Priority	84	2	7	75	38	31	7	65%	37	27	10
TOTAL		3136	19	37	3080	2704	2667	37	93%	376	197	179

* % issued within goal: includes applications received minus those withdrawn, returned, and pending still within 90- and 150-/210-day timeliness goal.

NOTE: The 210-day tier 2 goal calculations for municipal wastewater permits were first introduced in the FY2018 Annual Permitting Efficiency Report.

Table 2: Tier 2 permit applications from March 4, 2011 - June 30, 2019

Priority	Received	Withdrawn	Returned	Determined Complete	Issued (total)	Issued (within goal)	Issued (missed goal)	% issued within goal*	Pending (total)	Pending (still within goal)	Pending (missed goal)
Non-priority	8880	280	648	7952	5068	2895	2173	44%	2884	1428	1456
Priority	9962	59	141	9762	9374	9181	193	96%	388	209	179
TOTAL	17576	323	693	16560	14110	11780	2330	76%	2450	1089	1361

* % issued within goal: includes applications received minus those withdrawn, returned, and pending still within 150- or 210-day timeliness goal.

NOTE: The 210-day tier 2 goal calculations for municipal wastewater permits were first introduced in the FY2018 Annual Permitting Efficiency Report.

Applications received

Medium	priority	non-priority	Total
Air Permits	29	198	227
Land Permits	15	59	74
Water Permits	2,430	398	2,828
Total	2,474	655	3,129

This table lists the count of all applications received by MPCA during FY 2019 by environmental medium and legislative priority status (where **priority** refers to construction-related permits and **non-priority** refers to non-construction-related applications).

This view does not count such activities as permit/coverage terminations, notifications, pre-applications, confidentiality determinations, fee-processing activities, closure orders, and some types of registrations and modifications for certain environmental permitting programs, or applications where it was determined that no permit is required. Applications that were withdrawn or returned, and those for which permits were denied, are included in this table. Applications that are exempted from the timeliness goals due to funding are also included in this table.

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Tier 1 timeliness

Priority	Medium	issued <= 90	issued > 90	pending <= 90	pending > 90	Total
priority	Land Permits	7	1			8
	Water Permits	2,341	7	25	6	2,379
non-priority	Air Permits	61	4	17	1	83
	Land Permits	15	2	7	9	33
	Water Permits	46		1		47
Total		2,470	14	50	16	2,550

This table lists the count of all legislative Tier 1 applications (those not requiring individualized action and having a 90-day issuance goal) received during FY 2019 broken down by environmental medium and legislative priority status (where **priority** refers to construction-related permits and **non-priority** refers to non-construction-related applications).

The table breaks out permit applications as either **issued** or **pending**, and tells whether the applications resulted in permit issuance within the 90 day goal. For pending applications, time is calculated from the application receipt date to the lesser of today's date or the end of the reporting period (FY 2019).

This table does not include permit applications that were terminated as returned, denied, or withdrawn. Additionally, this table does not include permit applications that are exempted due to funding.

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Note: Permits that are "exempted due to funding" means that they are receiving Public Facilities Authority (PFA) loans. As defined by law, the permit application, review and approval process is significantly longer and, therefore, the timeliness goals are inappropriate.

Tier 2 timeliness

Priority	Medium	issued <= 150	issued <= 210	issued > 150	issued > 210	pending <= 150	pending <= 210	pending > 150	pending > 210	Total
priority	Air Permits	2		4		10		5		21
	Land Permits	4				1		2		7
	Water Permits	23	2	2	1	11	5	1	2	47
non-priority	Air Permits	3		4		28		43		78
	Land Permits	10		2		6		11		29
	Water Permits	150	3	7	3	50	36	63	36	348
Total		192	5	19	4	106	41	125	38	530

This table lists the count of all legislative Tier 2 applications (those not requiring individualized action and having a 150-day issuance goal, or for municipal wastewater permit applications, a 210-day issuance goal) received during FY 2019 broken down by environmental medium and legislative priority status (where **priority** refers to construction-related permits and **non-priority** refers to non-construction-related applications).

The table breaks out permit applications as either **issued** or **pending**, and tells whether the applications resulted in permit issuance within the 150 or 210 day goal. For pending applications, time is calculated from the application receipt date to the lesser of today's date or the end of the reporting period FY 2019.

This table does not include permit applications that were terminated as returned, denied, or withdrawn.

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Note: The list of pending permits can be found in Appendix B of this report

Appendix A – Tier 1 and 2 permit categories

Breakdown of permit types

Tier 1 (90 day goal)

Wastewater	Sewer Extension
Stormwater	Construction Stormwater General Permit
	Industrial Stormwater General Permit
Solid waste	General Concrete Permit
	Transfer station extensions
	Minor amendments for Solid Waste facilities
Air	Capped Permit – New and administrative changes
	Registration Permit – New and administrative changes
	Part 70 General Permit – New and administrative changes
	State General Permit – New and administrative changes
Hazardous waste	Administrative amendment
	Minor amendment
Feedlots	Construction short form
	Interim

Tier 2 (150-day goal)

Industrial Wastewater	Individual Industrial permits
Stormwater	Industrial Stormwater Individual Permits
	MS4 General Permit
	MS4 Individual Permits
Solid waste	Utilization Project – Case Specific Beneficial Use Determination
	Utilization Project – Demonstration Research Project
	New Solid Waste Facility Permits (non PBR) – (landfills, transfer station, SSO/MSW compost facilities, etc.)
	Major amendments for Solid Waste facilities
	Reissuance of Solid Waste facility permits
Air	Individual Part 70 Operating Permit
	Individual State Operating Permit
	Reissuance of expiring Individual Part 70 or State Operating Permit
	Major Amendment to an individual permit
	Moderate Amendment to an individual permit
	Minor Amendment to an individual permit
	Administrative Amendment to an individual permit
Applicability Determination	

Hazardous waste	Individual Permit
	Reissuance
	Major amendment
AST	Individual permit
	Reissuance
	Permit change
Feedlots	All other than Construction Short Form and Interim

Tier 2 (210-day goal)

Municipal Wastewater	Individual Municipal permits
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Appendix B

Reason for delay codes:

COMP - Unresolved compliance issues*

LACK - Lack of staff

NORS - No significant external reasons for delay

WAIT - Waiting for information from applicant*

PBLC - Significant public engagement process

CHRG - Changes in federal or state regulations or policies*

FDRV – Lengthy Federal or EPA review

INAD – Technically inadequate application forms, components and/or supporting documents

INCM – Incomplete info on required application forms, checklists, components, and/or supporting documents

*Note that COMP, WAIT and CHRG may involve scientific or technical disagreement.

Appendix B - Tier 1 projects over 90 days, Tier 2 projects over 150 or 210 days, and reasons for delay

Medium	Master Ai Name	Master Ai Id	Activity Number	Activity Type	Priority	Tier	App Received Date	Issuance Date	Day's in house (rec'd to FY end)	Reasons for Delay
Air Permits	3M - Administrative Offices - Maplewood	47995	IND20180001	Permit Change - Minor	non-priority	Tier 2	8/21/2018	Null	313	LACK;
	3M - R & D Facility - Maplewood Bldg 201	145433	IND20180002	Administrative Change	non-priority	Tier 2	10/5/2018	Null	268	LACK;
	ADM Corn Processing - Marshall	1161	IND20180001	Administrative Change	non-priority	Tier 2	7/27/2018	Null	338	LACK;
	Agri-Energy	531	IND20180002	Permit Change - Major	priority	Tier 2	11/19/2018	Null	223	INAD; WAIT;
	AI-Corn Clean Fuel	4665	IND20180003	Administrative Change	non-priority	Tier 2	9/10/2018	Null	293	LACK;
			IND20180004	Administrative Change	non-priority	Tier 2	9/18/2018	Null	285	LACK;
	American Peat Technology LLC	2173	IND20180001	Part 70 Permit Issuance	non-priority	Tier 2	9/7/2018	6/21/2019	287	WAIT; LACK;
	Benson Municipal Utilities	640	IND20180001	Part70PermitReissuance	non-priority	Tier 2	9/28/2018	Null	275	LACK;
	Blandin Paper Co/MN Power - Rapids Energy Center	444	IND20180002	Administrative Change	non-priority	Tier 2	8/8/2018	Null	326	LACK;
	Broadway Generation Plant	75498	IND20180001	Part70PermitReissuance	non-priority	Tier 2	8/31/2018	Null	303	LACK;
	CHS Inc - Erskine Grain	158125	IND20180001	State Permit Issuance	non-priority	Tier 2	8/31/2018	Null	303	LACK;
	Covia Holdings Corp	37624	IND20180001	Administrative Change	non-priority	Tier 2	9/5/2018	Null	298	LACK;
	Covia Holdings Corporation	37624	IND20180001	Administrative Change	non-priority	Tier 2	9/5/2018	Null	298	LACK;
	Covia Holdings Corporation - Kasota Mining Project	68	IND20180001	Administrative Change	non-priority	Tier 2	9/5/2018	Null	298	LACK;
	CytecEngineeredMaterials Inc	698	IND20180002	Administrative Change	non-priority	Tier 2	7/11/2018	Null	354	LACK;
	Enbridge Energy Limited Partnership - Clearbrook T..	1975	CPP20180001	Option 2 Issuance	non-priority	Tier 1	9/14/2018	Null	289	LACK;
	ERP Iron Ore LLC - Plant 2	135420	IND20180001	Administrative Change	non-priority	Tier 2	8/8/2018	Null	326	LACK;
	Flint Hills Resources Pine Bend LLC - Wescott Terminal	228184	RGP20180001	Option D Issuance	non-priority	Tier 1	12/3/2018	4/10/2019	128	WAIT;
	Flint Hills Resources Pine Bend Refinery	734	IND20180005	Permit Change - Major	non-priority	Tier 2	8/29/2018	Null	305	FDRV;
	Geotek LLC	10335	IND20180003	Permit Change - Minor	non-priority	Tier 2	7/3/2018	4/3/2019	274	NORS;
	Heartland Corn Products	743	IND20180005	Administrative Change	non-priority	Tier 2	8/6/2018	Null	328	NORS;
			IND20180006	Part 70 Permit Reissuance	non-priority	Tier 2	9/7/2018	Null	296	WAIT; COMP;
			IND20180007	Permit Change - Major	non-priority	Tier 2	10/1/2018	Null	272	NORS;
	Hibbing Taconite Co	1146	IND20190001	Permit Change - Minor	non-priority	Tier 2	1/24/2019	Null	157	LACK;
	Hormel Foods Corp/Quality Pork Processors - Austin	3926	IND20180003	Permit Change - Minor	non-priority	Tier 2	7/25/2018	Null	340	LACK;
	Hydrostat Inc	39525	GEN20180001	Low-Emitting Facility General Permit	non-priority	Tier 1	7/20/2018	10/25/20..	97	WAIT;
	Industrial Finishing Services Inc - Perham	63918	IND20190001	Part70PermitReissuance	non-priority	Tier 2	12/18/2018	Null	194	LACK;
	Kerry Ingredients and Flavours Inc	732	IND20180001	Permit Change - Minor	non-priority	Tier 2	7/5/2018	Null	360	LACK;
	LaMettry's Collision Inc	144123	RGP20180001	Option B Issuance	non-priority	Tier 1	8/28/2018	12/4/2018	98	NORS; WAIT;
	Litchfield city of	2109	IND20180001	Permit Change - Major	priority	Tier 2	10/12/2018	Null	261	LACK;
	Mankato Energy Center	95792	IND20180001	Part70PermitReissuance	non-priority	Tier 2	7/3/2018	Null	362	LACK;
	Marathon Saint Paul Park Refinery	447	IND20180004	Administrative Change	non-priority	Tier 2	12/21/2018	Null	191	LACK;
MarathonSt. Park Refinery	447	IND20180004	Administrative Change	non-priority	Tier 2	12/21/2018	Null	191	LACK;	
Met Council Metropolitan WWTP	2595	IND20190001	Permit Change - Major	priority	Tier 2	1/4/2019	Null	177	LACK;	
Minnesota Power - Boswell Energy Center	2493	IND20180001	Permit Change - Major	priority	Tier 2	11/30/2018	Null	212	WAIT;	
Minnesota Power - Laskin Energy Center	9933	IND20180001	Permit Change - Minor	non-priority	Tier 2	11/19/2018	Null	223	LACK;	
MOM Brands	678	IND20180002	Administrative Change	non-priority	Tier 2	11/29/2018	Null	213	LACK;	
		IND20180003	Permit Change - Major	non-priority	Tier 2	12/5/2018	Null	207	LACK;	
New Ulm Public Utilities - Municipal Power	1865	IND20190001	Part70PermitReissuance	non-priority	Tier 2	12/20/2018	Null	192	LACK;	
Northern Natural Gas Co - Carver	226206	IND20180001	State Permit Issuance	priority	Tier 2	9/28/2018	5/9/2019	223	LACK;	

Appendix B - Tier 1 projects over 90 days, Tier 2 projects over 150 or 210 days, and reasons for delay

Medium	MasterAiName	Master Ai Id	Activity Number	ActivityType	Priority	Tier	App Received Date	Issuance Date	Days in house (rec'd to FY end)	Reasons for Delay
Air Permits	Northern Natural Gas Co - Faribault	1293	IND20180002	Part 70 Permit Issuance	priority	Tier 2	9/28/2018	4/26/2019	210	WAIT;
	Northshore Mining Co - Silver Bay	1875	IND20180002	Permit Change - Minor	non-priority	Tier 2	8/10/2018	Null	324	LACK;
			IND20180003	Permit Change - Minor	non-priority	Tier 2	11/26/2018	Null	216	LACK;
			IND20190001	Permit Change - Minor	non-priority	Tier 2	1/7/2019	Null	174	LACK;
	Plasti Fab	1155	IND20180002	Permit Change - Major	priority	Tier 2	8/20/2018	3/14/2019	206	NORS;
	POET Biorefining - Preston, LLC	715	IND20180002	Administrative Change	non-priority	Tier 2	12/17/2018	5/22/2019	156	LACK;
	POET Biorefining LLC - Preston	715	IND20180002	Administrative Change	non-priority	Tier 2	12/17/2018	5/22/2019	156	LACK;
	PotlatchDeltic Land and Lumber LLC Bemidji	1157	IND20180002	Administrative Change	non-priority	Tier 2	7/26/2018	Null	339	LACK;
	PotlatchDeltic Land and Lumber LLC, Bemidji	1157	IND20180002	Administrative Change	non-priority	Tier 2	7/26/2018	Null	339	LACK;
	PURIS Proteins LLC	579	IND20180001	Administrative Change	non-priority	Tier 2	9/5/2018	Null	298	LACK;
			IND20180002	Administrative Change	non-priority	Tier 2	9/10/2018	Null	293	LACK;
			IND20190001	Administrative Change	non-priority	Tier 2	1/14/2019	Null	167	LACK;
	PURIS Proteins, LLC	579	IND20180001	Administrative Change	non-priority	Tier 2	9/5/2018	Null	298	LACK;
			IND20180002	Permit Change - Minor	non-priority	Tier 2	7/3/2018	Null	362	LACK;
	Saint Paul Park Refining Co 447 LLC		IND20180002	Permit Change - Major	non-priority	Tier 2	11/21/2018	Null	221	LACK;
		Sappi Cloquet LLC	2309	IND20180006	Administrative Change	non-priority	Tier 2	11/13/2018	Null	229
			IND20190001	Administrative Change	non-priority	Tier 2	1/4/2019	Null	177	LACK;
	Sheldahl Flexible Technologies Inc	1676	IND20180003	Administrative Change	non-priority	Tier 2	11/2/2018	Null	240	LACK;
	SUEZ WTS Solutions USA Inc 1428		IND20180003	Permit Change - Major	priority	Tier 2	8/16/2018	5/28/2019	285	WAIT;
			IND20180004	Administrative Change	non-priority	Tier 2	12/5/2018	5/28/2019	174	LACK;
	SUEZ WTS Solutions USA, Inc.	1428	IND20180004	Administrative Change	non-priority	Tier 2	12/5/2018	5/28/2019	174	LACK;
	Superior Minerals Co	65	IND20180001	Permit Change - Minor	non-priority	Tier 2	10/30/2018	Null	243	LACK;
	Upsher Smith Laboratories Inc	483	RGP20180001	Option D Issuance	non-priority	Tier 1	11/19/2018	3/25/2019	126	WAIT;
Water Gremlin Co	2005	IND20180001	Permit Change - Major	priority	Tier 2	10/23/2018	Null	250	COMP;	
Willmar Municipal Utilities	2308	IND20180001	Permit Change - Minor	non-priority	Tier 2	7/6/2018	7/8/2019	359	LACK;	
Worthington Diesel Generating Plant	61751	IND20180001	Part 70 Permit Reissuance	non-priority	Tier 2	10/4/2018	Null	269	LACK;	
Xcel Energy - Inver Hills Generating Pit	2343	IND20180001	Permit Change - Major	non-priority	Tier 2	7/11/2018	Null	354	LACK;	
Land Permits	Ag Processing Inc - Dawson	430	IND20180001	Permit Reissuance	non-priority	Tier 2	10/12/2018	3/18/2019	157	LACK;
	Moorhead	2248	IND20180002	Permit Reissuance	non-priority	Tier 2	9/27/2018	Null	276	LACK;
	Chippewa Valley Ethanol Co LLLP	420	IND20180001	Permit Reissuance	non-priority	Tier 2	12/11/2018	Null	201	LACK;
	Clay Demolition Landfill	866	IND20190001	Permit Change - Minor	non-priority	Tier 1	3/27/2019	Null	95	WAIT;
	Craig Strand Property	227545	PBR20180001	Demolition Debris PBR	non-priority	Tier 1	10/26/2018	Null	247	WAIT;
	Dem-Con Companies	121041	APP20180001	Demonstration Research Project	non-priority	Tier 2	10/17/2018	4/30/2019	195	WAIT;
	Dem-Con Recovery & Recycling LLC	3337	IND20180001	Permit Reissuance	non-priority	Tier 2	7/31/2018	Null	334	LACK;
	Fillmore County Resource Recovery Center	3957	IND20190001	Permit Change - Major	non-priority	Tier 2	1/22/2019	Null	159	CHRG;
	Flint Hills Resources Pine Bend LLC - Savage	2345	IND20180001	Permit Reissuance	non-priority	Tier 2	7/13/2018	Null	352	LACK;
	Freeway Transfer Inc	4110	IND20190001	Permit Reissuance	non-priority	Tier 2	1/7/2019	Null	174	CHRG;
	Hardrives Inc - Plant 201	151482	IND20180001	Permit Change - Major	priority	Tier 2	8/10/2018	Null	324	LACK;
	Hawkins Terminal II	28426	IND20180001	Permit Reissuance	non-priority	Tier 2	7/19/2018	Null	346	LACK;
	Nexo Solutions LLC	1229	PBR20180001	Transfer Station PBR	non-priority	Tier 1	10/8/2018	1/8/2019	92	LACK;

Appendix B - Tier 1 projects over 90 days, Tier 2 projects over 150 or 210 days, and reasons for delay

Medium	Master Ai Name	Master Ai Id	Activity Number	Activity Type	Priority	Tier	App Received Date	Issuance Date	Days in house (rec'd to FY end)	Reasons for Delay
Land Permits	Nobles County Landfill	2283	IND20180001	Permit Change - Major	priority	Tier 2	9/4/2018	Null	299	LACK;
	Randy D Saehr Property	84387	PBR20180001	Demolition Debris PBR	non-priority	Tier 1	7/16/2018	Null	349	NORS;
	Ridley Block Operations	94125	IND20180001	Permit Reissuance	non-priority	Tier 2	12/18/2018	Null	194	LACK;
	Sappi Cloquet LLC	2309	IND20180005	Permit Reissuance	non-priority	Tier 2	10/3/2018	Null	270	LACK;
	Tri-County Organics	140882	IND20180001	Administrative Change	non-priority	Tier 1	7/26/2018	Null	339	CHRG;
	Trumbull Owens Corning Roofing LLC	57714	IND20180001	Permit Reissuance	non-priority	Tier 2	8/15/2018	Null	319	LACK;
	US Fish and Wildlife Service -Morris Wetland Managemen..	226197	GEN20180001	Concrete Burial General Permit	priority	Tier 1	9/20/2018	3/18/2019	179	LACK;
	Watson Recycling	3289	PBR20190001	SW Recycling PBR	non-priority	Tier 1	1/23/2019	4/29/2019	96	WAIT;
Western Lake Superior Sanitary District Administr..	2426	IND20180004	Permit Reissuance	non-priority	Tier 2	9/27/2018	Null	276	WAIT;	
Water Permits	7-Clans Casino WWTP	4744	GEN20180001	Coverage Issuance	non-priority	Tier 2	8/13/2018	Null	321	NORS;
	A and M Aggregate	126122	GEN20180001	Coverage Change	non-priority	Tier 2	10/30/2018	4/1/2019	153	NORS;
	A B Mauri Food Inc	664	GEN20180001	Coverage Issuance	non-priority	Tier 2	11/15/2018	Null	227	NORS;
	AaCron Inc	1247	GEN20180001	Coverage Issuance	non-priority	Tier 2	11/30/2018	Null	212	NORS;
	ABA Water Systems Inc	46285	IND20180001	Permit Reissuance	non-priority	Tier 2	7/25/2018	4/12/2019	261	NORS;
	ADM - Red Wing	1685	GEN20180001	Coverage Issuance	non-priority	Tier 2	11/1/2018	Null	241	NORS;
	Aggregate Industries Inc - Nelson Plant	3556	IND20180001	Permit Reissuance	non-priority	Tier 2	12/21/2018	Null	191	NORS;
	Akeley WWTP	2323	IND20180001	Permit Reissuance	non-priority	Tier 2	8/22/2018	7/1/2019	312	NORS;
	Alexandria Extrusion Co	1381	IND20190001	Permit Reissuance	non-priority	Tier 2	1/2/2019	Null	179	WAIT;
	Alexandria Light & Power	1382	GEN20180001	Coverage Issuance	non-priority	Tier 2	11/26/2018	Null	216	NORS;
	AMPI - Rochester - MNG255 General	152954	GEN20180001	Coverage Issuance	non-priority	Tier 2	12/3/2018	Null	209	NORS;
	Andersen Corp	575	IND20180001	Permit Change - Minor	non-priority	Tier 2	8/6/2018	Null	328	NORS;
	Avienda Mass Grading	228517	GEN20190001	Coverage Issuance	priority	Tier 1	2/22/2019	5/29/2019	96	INCM;
	Badger Foundry Co	423	GEN20180001	Coverage Issuance	non-priority	Tier 2	11/30/2018	Null	212	NORS;
	BAE Systems Land & Armaments LP	124478	GEN20180001	Coverage Issuance	non-priority	Tier 2	12/7/2018	Null	205	NORS;
	BBC HAREN	212640	GEN20180001	Coverage Issuance	non-priority	Tier 2	11/16/2018	Null	226	WAIT;
	BBC KANSAS	212640	GEN20180001	Coverage Issuance	non-priority	Tier 2	11/16/2018	Null	226	WAIT;
	Bel Clare Estates WWTP	152461	IND20180001	Permit Reissuance	non-priority	Tier 2	12/28/2018	Null	184	NORS;
	Benson WWTP	1496	IND20180001	Permit Reissuance	non-priority	Tier 2	8/27/2018	Null	307	CHRG;
	Birds Eye Foods LLC	897	IND20180001	Permit Change - Major	priority	Tier 2	12/19/2018	6/1/2019	164	WAIT;
	Blomkest Svea Sewer Board WWTP	133699	IND20180001	Permit Reissuance	non-priority	Tier 2	9/21/2018	Null	282	NORS;
	Blue Earth WWTP	36251	IND20180001	Permit Reissuance	non-priority	Tier 2	10/17/2018	Null	256	CHRG;
	Boomerang Laboratories Inc	92122	IND20180001	Permit Reissuance	non-priority	Tier 2	7/2/2018	Null	363	NORS;
	Brainerd WWTP	1629	IND20180001	Permit Reissuance	non-priority	Tier 2	10/2/2018	Null	271	NORS;
	Caledonia Haulers Inc	143998	GEN20180001	Coverage Issuance	non-priority	Tier 2	9/28/2018	3/15/2019	168	NORS;
	Cargill ValueAddedMeats	790	GEN20180001	Coverage Issuance	non-priority	Tier 2	12/3/2018	Null	209	NORS;
	Carnelian Hills Community - May Township	2984	IND20180001	Permit Reissuance	non-priority	Tier 2	8/10/2018	Null	324	NORS;
	Cedar Mills WWTP	90256	IND20180001	Permit Reissuance	non-priority	Tier 2	7/16/2018	7/1/2019	349	NORS;
Central Bi-Products - Long Prairie	608	IND20180001	Permit Reissuance	non-priority	Tier 2	8/29/2018	Null	305	NORS;	
Central Boiler Inc	81672	GEN20180001	Coverage Issuance	non-priority	Tier 2	11/30/2018	Null	212	NORS;	
Central Iron Range Sanitary Sewer District WWTP	295	IND20180001	Permit Reissuance	non-priority	Tier 2	11/26/2018	Null	216	NORS;	

Appendix B - Tier 1 projects over 90 days, Tier 2 projects over 150 or 210 days, and reasons for delay

Medium	Master Ai Name	Master Ai Id	Activity Number	Activity Type	Priority	Tier	App Received Date	Issuance Date	Days in house (rec'd to FY end)	Reasons for Delay
Water Permits	Chandler WWTP	13819	IND20180001	Permit Reissuance	non-priority	Tier 2	10/29/2018	Null	244	NORS;
	Claremont WWTP	4850	IND20180001	Permit Reissuance	non-priority	Tier 2	10/1/2018	Null	272	NORS;
	Cloquet Island Estates	228356	GEN20190001	Coverage Issuance	priority	Tier 1	2/11/2019	6/7/2019	116	INCM;
	CP 23-76	228168	GEN20190001	Coverage Issuance	priority	Tier 1	1/14/2019	5/2/2019	108	INCM;
	Credit River Township - Stonebridge	87912	IND20180001	Permit Reissuance	non-priority	Tier 2	8/29/2018	Null	305	NORS;
	Credit River Township - Territory	88060	IND20180001	Permit Reissuance	non-priority	Tier 2	8/29/2018	Null	305	NORS;
			SWX20180001	Sewer Extension	priority	Tier 1	10/4/2018	Null	269	NORS;
	CSAH 10 Reconstruction	228546	GEN20190001	Coverage Issuance	priority	Tier 1	2/27/2019	Null	123	INCM;
	Cummins Power Systems	2447	GEN20180001	Coverage Issuance	non-priority	Tier 2	11/30/2018	Null	212	NORS;
	Detroit Lakes WWTP	1746	IND20180001	Permit Reissuance	priority	Tier 2	7/2/2018	Null	363	NORS;
	Double D Truckwash	140678	GEN20180001	Coverage Issuance	non-priority	Tier 2	11/8/2018	6/1/2019	205	NORS;
	Dundee WWTP	136160	GEN20180001	Coverage Issuance	non-priority	Tier 2	11/13/2018	Null	229	NORS;
	Eagle Vista Estates 2	93254	IND20180001	Permit Reissuance	non-priority	Tier 2	10/11/2018	Null	262	WAIT;
	Eden Prairie Well House 6 & 7	3150	GEN20180001	Coverage Issuance	non-priority	Tier 2	10/15/2018	Null	258	NORS;
	Enbridge Energy Line 3 Replacement Project	220319	IND20180001	Permit Issuance	priority	Tier 2	10/31/2018	Null	242	PBLC;
	Erie Trader	145863	GEN20180001	Coverage Issuance	non-priority	Tier 2	12/5/2018	Null	207	NORS;
	Exit 87 Truck Wash	228095	GEN20180001	Coverage Issuance	non-priority	Tier 2	12/26/2018	8/1/2019	186	CHRG;
	Fergus Power Pump Inc	10664	IND20180001	Permit Reissuance	non-priority	Tier 2	8/29/2018	7/1/2019	305	NORS;
	Flint Hills Resources LC - Cottage Grove	4238	IND20180001	Permit Change - Minor	non-priority	Tier 2	7/26/2018	Null	339	NORS;
	Former Advance Machine Co	35703	IND20180002	Permit Reissuance	non-priority	Tier 2	1/7/2019	Null	174	NORS;
	Fuller Lake Rest Area	231298	GEN20190001	Coverage Issuance	priority	Tier 1	2/19/2019	6/28/2019	129	INCM;
	Gerdau Ameristeel - Duluth	52773	GEN20180001	Coverage Issuance	non-priority	Tier 2	11/30/2018	Null	212	NORS;
	Gold'n Plump Poultry LLC	3502	IND20180001	Permit Reissuance	non-priority	Tier 2	12/27/2018	Null	185	WAIT;
	Hammond WWTP	91011	IND20180001	Permit Reissuance	non-priority	Tier 2	10/2/2018	Null	271	PBLC;
	Hayfield WWTP	4852	IND20180001	Permit Reissuance	non-priority	Tier 2	11/30/2018	Null	212	NORS;
	Hendricks WWTP	2043	IND20180001	Permit Reissuance	non-priority	Tier 2	11/26/2018	Null	216	NORS;
	Hiawatha Metalcraft Inc	1118	GEN20180001	Coverage Issuance	non-priority	Tier 2	11/2/2018	Null	240	NORS;
	Hope - Somerset Township WWTP	121904	IND20180001	Permit Reissuance	non-priority	Tier 2	11/19/2018	Null	223	NORS;
	Hormel Foods Corp/Quality Pork Processors - Austin	3926	IND20180004	Permit Reissuance	non-priority	Tier 2	8/1/2018	Null	333	NORS;
	Kansas	212640	GEN20180001	Coverage Issuance	non-priority	Tier 2	11/16/2018	Null	226	WAIT;
	Kemps LLC - Culture Products Facility	1371	GEN20180001	Coverage Issuance	non-priority	Tier 2	11/27/2018	Null	215	NORS;
	Kerry Inc	152613	GEN20180001	Coverage Issuance	non-priority	Tier 2	12/10/2018	Null	202	NORS;
Lake Beauty Covenant Bible Camp	4594	IND20180001	Permit Reissuance	non-priority	Tier 2	8/31/2018	5/20/2019	262	NORS;	
Lakes of Fairhaven WWTP	93000	IND20180001	Permit Reissuance	non-priority	Tier 2	12/10/2018	7/1/2019	202	NORS;	
Liberty Ponds	84367	IND20180001	Permit Change - Minor	non-priority	Tier 2	10/17/2018	6/20/2019	246	LACK;	
Lismore Hutterian Brethren Inc	8068	IND20190001	Permit Reissuance	non-priority	Tier 2	1/9/2019	Null	172	NORS;	
Litchfield WWTP	1184	IND20180001	Permit Reissuance	non-priority	Tier 2	11/16/2018	Null	226	NORS;	
Long Prairie Packing Co LLC - Long Prairie	2106	IND20180001	Permit Reissuance	non-priority	Tier 2	11/30/2018	Null	212	NORS;	
Lutsen Resort WWTP	9943	IND20180001	Permit Change - Minor	non-priority	Tier 2	8/15/2018	Null	319	NORS;	
Luverne WWTP	2110	IND20180001	Permit Reissuance	priority	Tier 2	9/14/2018	6/6/2019	265	NORS;	

Appendix B - Tier 1 projects over 90 days, Tier 2 projects over 150 or 210 days, and reasons for delay

Medium	Master Ai Name	Master Ai Id	Activity Number	Activity Type	Priority	Tier	App Received Date	Issuance Date	Days in house (rec'd to FY end)	Reasons for Delay
Water Permits	MAC-Minneapolis/St Paul Intl Airport-GWP	152772	IND20180001	Permit Reissuance	non-priority	Tier 2	10/30/2018	Null	243	NORS;
	Marshall WWTP	1333	IND20180002	Permit Reissuance	non-priority	Tier 2	11/29/2018	Null	213	NORS;
	Mayer WWTP	87221	IND20180001	Permit Reissuance	non-priority	Tier 2	7/18/2018	Null	347	NORS;
	Meadows of Whisper Creek WWTP	88920	IND20180001	Permit Reissuance	non-priority	Tier 2	7/12/2018	Null	353	NORS;
	Middle River WWTP	200	IND20180001	Permit Reissuance	non-priority	Tier 2	7/18/2018	Null	347	NORS;
	Milk Specialties Co	152775	GEN20180001	Coverage Issuance	non-priority	Tier 2	12/4/2018	6/1/2019	179	NORS;
	MNDOT Straight River Rest Area	4845	IND20180001	Permit Reissuance	non-priority	Tier 2	10/31/2018	Null	242	NORS;
	Montevideo WWTP	1489	IND20180001	Permit Reissuance	non-priority	Tier 2	9/12/2018	Null	291	NORS;
	Motley WWTP	1644	IND20180001	Permit Reissuance	non-priority	Tier 2	7/20/2018	Null	345	LACK;
	Nevis WWTP	1131	IND20180001	Permit Reissuance	non-priority	Tier 2	7/25/2018	6/14/2019	324	NORS;
	North Long Lake WWTP	7156	IND20180002	Permit Reissuance	non-priority	Tier 2	11/28/2018	Null	214	NORS;
	Northern Natural Gas Co - Wrenshall LNG Plant	2002	IND20180001	Permit Reissuance	non-priority	Tier 2	9/24/2018	Null	279	NORS;
	Northwoods Ice of Bemidji Inc	2322	GEN20180001	Coverage Issuance	non-priority	Tier 2	12/5/2018	Null	207	NORS;
	Ogilvie WWTP	3883	IND20180001	Permit Reissuance	priority	Tier 2	7/5/2018	Null	360	LACK;
	Oronoco Estates	3413	IND20180001	Permit Reissuance	non-priority	Tier 2	9/28/2018	Null	275	PBLIC;
	Otter Tail Power Co - General Office	585	GEN20180001	Coverage Issuance	non-priority	Tier 2	11/21/2018	Null	221	NORS;
	Pioneer Campsite	8078	IND20180001	Permit Reissuance	non-priority	Tier 2	12/3/2018	Null	209	LACK;
	Pipestone WWTP	1913	IND20180001	Permit Reissuance	non-priority	Tier 2	7/3/2018	Null	362	NORS;
	POET Biorefining - Preston LLC	715	IND20180003	Permit Change - Minor	non-priority	Tier 2	12/12/2018	Null	200	NORS;
	Prairie Feeders - FP21 Site	223346	GEN20180001	Coverage Issuance	priority	Tier 2	9/19/2018	3/8/2019	170	PBLIC;
	Prinsburg WWTP	7581	IND20180001	Permit Reissuance	non-priority	Tier 2	7/23/2018	Null	342	NORS;
	Raymond WWTP	3512	IND20180001	Permit Reissuance	non-priority	Tier 2	9/28/2018	Null	275	NORS;
	Resideo Technologies Inc	1286	GEN20180003	Coverage Issuance	non-priority	Tier 2	12/13/2018	Null	199	NORS;
	Residio - Golden Valley	1286	GEN20180001	Coverage Change	non-priority	Tier 2	11/2/2018	Null	240	NORS;
	Robinson Rubber Products Co Inc	1124	GEN20180001	Coverage Issuance	non-priority	Tier 2	11/26/2018	Null	216	NORS;
	Rochester Natural Gas Pipeline Project - Phases II.. S.P. 2780-97 & S.P. 2780-99 - I94 UBOL	227852 228810	GEN20180001 GEN20190001	Coverage Issuance Coverage Issuance	priority priority	Tier 1 Tier 1	11/30/2018 3/22/2019	5/1/2019 7/8/2019	152 100	INCM; INCM;
	Saint John's University	2251	IND20180001	Permit Reissuance	non-priority	Tier 2	11/30/2018	Null	212	NORS;
	Saint Paul Park Refining Co LLC	447	IND20180003	Permit Reissuance	non-priority	Tier 2	11/28/2018	Null	214	NORS;
	SAP 059-613-015	228232	GEN20190001	Coverage Issuance	priority	Tier 1	1/23/2019	Null	158	INCM;
	Saputo Dairy Foods USA LLC 3546		GEN20180001	Coverage Issuance	non-priority	Tier 2	11/19/2018	Null	223	NORS;
			IND20180001	Permit Reissuance	non-priority	Tier 2	11/19/2018	Null	223	NORS;
	Sauk Centre WWTP	7153	IND20180001	Permit Reissuance	non-priority	Tier 2	10/17/2018	Null	256	NORS;
	Sexton Posch Automotive Inc dba Brandl Motors	125948	GEN20180001	Coverage Issuance	non-priority	Tier 2	11/29/2018	Null	213	COMP;
	Sherburne Mobile Home Park	3894	IND20180001	Permit Reissuance	non-priority	Tier 2	9/21/2018	Null	282	LACK;
Tate & Lyle Ingredients Americas LLC	4810	GEN20180001	Coverage Issuance	non-priority	Tier 2	12/17/2018	Null	195	NORS;	
Technical Die-Casting Inc	848	GEN20180002	Coverage Change	non-priority	Tier 2	12/5/2018	Null	207	NORS;	
		GEN20180003	Coverage Issuance	non-priority	Tier 2	12/7/2018	Null	205	NORS;	
The Preserve at Birch Lake WWTP	74046	IND20190001	Permit Reissuance	non-priority	Tier 2	1/30/2019	Null	151	NORS;	
Thief River Falls Power Plant	1526	GEN20180001	Coverage Issuance	non-priority	Tier 2	11/8/2018	Null	234	NORS;	

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Medium	MasterAi Name	Master Ai Id	Activity Number	Activity Type	Priority	Tier	App Received Date	Issuance Date	Days in house (rec'd to FY end)	Reasons for Delay
Water Permits	Thumper Pond WWTP	92633	IND20190001	Permit Reissuance	non-priority	Tier 2	1/29/2019	7/15/2019	152	NORS;
	Tri-City Wastewater Treatment Systems Board	3353	IND20180001	Permit Reissuance	non-priority	Tier 2	10/26/2018	Null	247	CHRG;
	Trimont WWTP	13959	IND20180001	Permit Reissuance	non-priority	Tier 2	7/24/2018	Null	341	CHRG;
	Two Harbors WWTP	986	IND20180001	Permit Reissuance	non-priority	Tier 2	10/15/2018	6/26/2019	254	NORS;
	Ullr & Eagle Mountain WWTF	99491	IND20180001	Permit Reissuance	non-priority	Tier 2	8/28/2018	Null	306	NORS;
	Underwood WWTP	37424	IND20180001	Permit Reissuance	non-priority	Tier 2	8/6/2018	6/1/2019	299	NORS;
	USG Interiors LLC - Cloquet MN	3659	GEN20180001	Coverage Issuance	non-priority	Tier 2	12/4/2018	Null	208	NORS;
	Vermillion WWTP	3140	IND20180001	Permit Reissuance	non-priority	Tier 2	10/25/2018	Null	248	NORS;
	Viking WWTP	100562	IND20180001	Permit Reissuance	non-priority	Tier 2	11/19/2018	Null	223	NORS;
	Viracon Inc	2736	GEN20180001	Coverage Issuance	non-priority	Tier 2	12/24/2018	Null	188	NORS;
	VZ Hogs LLP - North Finishers	74050	GEN20180001	Coverage Issuance	non-priority	Tier 2	12/17/2018	Null	195	INCM;
	Waterville WWTP	2958	IND20180001	Permit Reissuance	non-priority	Tier 2	8/23/2018	Null	311	NORS;
	Whistling Valley Development WWTP	91136	IND20190001	Permit Reissuance	non-priority	Tier 2	1/4/2019	Null	177	NORS;
	Xcel Energy - Minnesota Valley	2342	IND20180001	Permit Reissuance	non-priority	Tier 2	11/2/2018	Null	240	NORS;
Zumbrota WWTP	2745	IND20180001	Permit Reissuance	non-priority	Tier 2	9/5/2018	Null	298	NORS;	