



**REPORT TO THE
LEGISLATURE**

DECEMBER 2024

Annual Permitting Efficiency Report

Tracking the Minnesota Pollution Control Agency's efforts to maintain efficiency in completing environmental permits, and helping to support our state's economy.

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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Contents

- Executive summary**1
- Background**4
 - Priority permits5
 - Improvement efforts6
 - Data8
- Appendix A – Tier 1 and 2 permit categories**12
 - Breakdown of permit types12
 - Tier 1 (90 day goal)12
 - Tier 2 (150-day goal)12
 - Tier 2 (210-day goal)13
- Appendix B**14
 - Appendix B - Tier 1 projects over 90 days, Tier 2 projects over 150 or 210 days, and reasons for delay15

Executive summary

(Current review period: July 1, 2023 – June 30, 2024)

	2016	2017	2018	2019	2020	2021	2022	2023	2024
Priority permits that met goal	97%	94%	97%	99%	98%	98%	99%	98%	98%
Non-priority permits that met goal	40%	46%	63%	61%	92%	83%	46%	76%	67%
All permits that met goal	74%	87%	93%	93%	96%	96%	89%	91%	95%

The Minnesota Pollution Control Agency (MPCA or agency) is committed to ensuring Minnesotans have healthy air, sustainable lands, clean water and a better climate. The MPCA works collaboratively to implement policies that achieve results. The following report is an assessment of the agency’s permitting efficiency as an indicator for our ability to issue environmentally protective permits while also supporting economic growth.

The MPCA manages more than 28,000 air, water and land permits at 22,500 sites (facilities can have more than one permit). The overall permitting efficiency continues to be very good especially regarding the **MPCA’s priority permits which meet permit timeliness goals 98% of the time** and which also represent economic growth and new job opportunities for the state. However, the table below shows that there are some permit types that are difficult to issue within the provided timelines. Priority permits are defined as needing construction for new or expanding projects and they tend to be the most technically complex and controversial projects.

During this review period, the agency saw more non-priority permits, defined as the more routine permitting such as reissuances of an existing permit with no substantive change or construction. The agency faces challenges on completing routine permits by the deadline. While 67% of those permits meet their timing goals, we know we have work to do and are committed to identifying how those improvements can be made to get that number closer to 90 percent.

The table above represents permit applications received in 2024 and permit applications that have not met the goal are listed in the Appendix B.

Tier 1 permits are permits that do not require individualized actions or public comment periods. These permits 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 or a 210-day issuance goal for publicly owned wastewater treatment facilities. During the review period, the MPCA received 2,248 Tier 1 and 332 Tier 2 applications.

The agency returned 2% of applications as incomplete for this review period.

Although permitting efficiency continues to be very good for priority permits issued by the agency as a whole, a more detailed look at the media – air, land, and water – shows that not all permitting programs achieved the permitting efficiency goals. Improvement efforts are underway, and some permitting changes have begun in calendar year 2024 to help address permitting issues, as discussed in the Improvement efforts section.

Permit type by media in 2024

Media	Tier	Priority	2024
Air Permits	Tier 1	Priority permits that met goal	100%
		Non-priority permits that met goal	91%
		All permits that met goal	91%
	Tier 2	Priority permits that met goal	0%
		Non-priority permits that met goal	6%
		All permits that met goal	5%
	Tier 1 and 2	Priority permits that met goal	9%
		Non-priority permits that met goal	57%
		All permits that met goal	51%
Land Permits	Tier 1	Priority permits that met goal	50%
		Non-priority permits that met goal	33%
		All permits that met goal	43%
	Tier 2	Priority permits that met goal	50%
		Non-priority permits that met goal	18%
		All permits that met goal	33%
	Tier 1 and 2	Priority permits that met goal	50%
		Non-priority permits that met goal	21%
		All permits that met goal	36%
Water Permits	Tier 1	Priority permits that met goal	99%
		Non-priority permits that met goal	98%
		All permits that met goal	99%
	Tier 2	Priority permits that met goal	69%
		Non-priority permits that met goal	64%
		All permits that met goal	65%
	Tier 1 and 2	Priority permits that met goal	99%
		Non-priority permits that met goal	76%
		All permits that met goal	97%

New in this report, the table above is a more detailed look at the Tier 1 and 2 priority and non-priority permits according to media – air, land, and water – for permit applications received in 2024.

Air and water Tier 1 permits met permitting efficiency goals 91% and 99% of the time, respectively. Tier 1 land permits met the permitting efficiency goal 43% of the time. Tier 1 permits are permits that do not require individualized actions or public comment periods. These permit types have a 90-day issuance goal.

Five percent of all air Tier 2 permits, 33% of all land Tier 2 permits and 65% of all water Tier 2 permits met the permitting efficiency goal. Tier 2 permits are permits that require individualized actions or a public comment period and have a 150-day issuance goal or a 210-day issuance goal for publicly owned wastewater treatment facilities. These permits are more complicated to process and require substantial amounts of information to be provided by the party seeking the permit. These permit types also require public notice periods, public engagement, coordination with federal permitting authorities at the U.S.

Environmental Protection Agency, and may also be subject to environmental review requirements. The list of permit types by media in each tier can be found in Appendix A.

During the review period, the MPCA received 2,248 Tier 1 and 332 Tier 2 applications and 95% of those applications resulted in permits issued within the 90-day, 150-day or 210-day issuance goal.

For the 5% of permit applications that do not result in permit issuance by the goals, reasons for the permit issuance delay are tracked and reported in Appendix B of the report. The reasons of delay are many, but can predominately be broken down into reasons remedied by the applicant or reasons better addressed by the agency.

Reasons for Delay in 2024

Tier	Priority	Applicant Related Delay	Agency Related Delay
Tier 1	Priority	7 (62%)	5 (38%)
	Non-priority	1 (12%)	7 (88%)
Tier 2	Priority	8 (35%)	15 (65%)
	Non-priority	10 (12%)	70 (88%)

The table above shows the reasons for delay by Tier and permit priority. Previous reports have not summarized the reasons for permit issuance delay, but understanding the reasons for delay offers insight into areas for improvement in the permitting process. For example, while a permit application may be called administratively complete within the first 30-days, a more in-depth technical review of the application may result in agency permit staff to notify the applicant that the permit application is technically incomplete, or is missing information. Waiting for the applicant to provide the missing or incomplete information creates a delay during which the agency cannot work on the permit.

For priority permits, this period of back and forth contributes to delays in achieving the 90-day permitting efficiency goal for Tier 1 62% of the time. While Tier 2 priority permits are delayed 35% of the time by issues largely remedied by the applicant.

Other reasons for the delay are areas of improvement by the agency – this is discussed in the Improvement efforts section below. A “lack of staff” and “no significant external reasons for delay” are the two most frequent responses by agency staff for permit delays. “No significant external reasons for delay” are an indicator for permitting process improvements, which are ongoing and vary across the media. See further discussion in the Improvement efforts section below.

Permitting programs across the agency are consistently evaluating ways to balance the needs of all Minnesotans from efficiently issuing permits on timelines that people can count on, to conducting a thorough technical analysis, and engagement with Minnesotans on the potential human and environmental impacts of the permitted activities, particularly in overburdened communities.

Addressing a lack of staff for permitting programs has been a long-standing and program specific endeavor. Recent agency staffing resources have been focused on maintaining existing services rather than increasing staff for the agency’s regulatory work.

Some program specific funding for additional staff occurred during the 2023 and 2024 legislative sessions, with programs hiring permitting staff in late 2023 and throughout calendar year 2024. In 2023, the Solid Waste program received funding for seven new staff and created a new unit dedicated to

permitting. The agency is in the process of hiring the new staff for this solid waste permitting unit. In 2023 and 2024, the Air permitting program received funding for staff to work on the development of a cumulative impacts analysis rule, which will expand and govern the analysis for permit decisions in environmental justice areas, and for the development of new rules governing air toxics regulations for facilities that emit air toxics in certain counties in Minnesota. Once the rules are adopted, the staff will be dedicated to permitting. Additionally, in 2024, the MPCA requested and received additional air permitting staff to focus on permitting in environmental justice areas.

The Minnesota Legislature has taken significant steps toward assessing and addressing inequalities that arise from environmental pollution. The agency's analysis shows that people who live in areas with more low-income residents or more people of color are more than twice as likely as the state average to have polluting facilities nearby and are nearly three times as likely as those in the rest of the state to face risks to their health from pollution emitted by those facilities. The MPCA is committed to focusing permitting in environmental justice areas in the state, which will require greater analysis, community engagement, and time during the permitting process.

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 (EQB), 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 required 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 was then established in Session Laws 2011, Chapter 4, codified in Minn. Stat. § 116.03. The statutory goal differs from the executive order goal in that the statutory goal begins counting time upon the initial submission of an application, instead of when the application is determined to be complete by the agency. 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 requires 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 set a new goal of 210 days for Tier 2 permits issued to publicly owned wastewater treatment facilities.

MPCA's environmental permitting programs

The MPCA manages more than 28,000 air, water, and land permits at 22,500 sites (facilities can have more than one type of permit). 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 the MPCA serves, and new applicants would be required to seek necessary permits directly from the EPA's Regional Office in Chicago (Region 5). 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 – at a minimum of 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 adds 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, applying standardized requirements for all permittees using these types of permits. 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.

Land permits – Individual and general permits for facility operations 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.

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.

Priority permits

The mission of the MPCA's permitting programs is to protect and improve the environment and 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

Agency data management system improvements

The MPCA continues to upgrade its permitting data management system, called Tempo (the MPCA’s environmental database), to improve utility for staff and permittees. The MPCA added new online features, which will allow permittees to update and submit permitting data electronically, and improvements for staff management of permits in Tempo. These changes improve ease of access and faster submittals for the permittees and speed up the over-all permitting process.

Most recently, the agency updated services for electronic permit applications for the feedlot program and sanitary sewer extensions. These updates allow nearly all sanitary sewer extension permits to be auto-issued based on data submitted and only a few will require staff review before issuance, ensuring municipalities can fully utilize Minnesota’s construction season.

The agency began work to bring on wastewater related reports and permit applications into Tempo in May 2024. These efforts are priority work for development resources. On September 5, 2024, the MPCA updated existing air permit online services for air administrative and reissuance permits. In fall 2024, work begins on online application services to allow for major and minor amendments for registration and individual permits air permits. Finally, the MPCA has initiated work on a solid waste application service, with first release expected in calendar year 2025. The agency also continues to implement continuous improvement projects to streamline permitting processes, provide flexibility to regulated parties, and increase engagement with communities while still ensuring we issue technically and legally defensible permits that protect human health and the environment.

All permitting programs continue to engage with permit applicants to accommodate changes to their projects, time extensions to our information needs, and flexibility in permit language all at the expense of permit timeliness. With respect to community needs, we continue to refine our process for addressing environmental justice, an area of focus with EPA and the state.

Here are a few of the efforts by permitting programs in the last year to create new permitting efficiencies:

Air permitting program improvements

In early 2023, the air permitting program completed a thorough review of its existing permitting process and found that delays in permitting came from three areas: a lack of staff, waiting for permit applicants or incomplete information on application forms and no significant external reasons for delay. While staff selected “no significant external reasons for delay” a more rigorous review was needed to identify the issues staff were experiencing in the permitting process. As a result of the review, several projects were initiated as a result of the effort and have been implemented in the last year:

- Internal process improvements, including streamlining permit application reviews can be made by updating the existing air permit online services. As discussed above, online services will be updated as early as fall 2024.

- Providing assistance to permit applicants and their consultants will improve permit applications and cut down on delays during the technical review period. Several efforts have been made in the last year to provide additional services to applicants:
 - Early and increased review of mathematical calculations in the air permit application is now part of the 30-day completeness review so that applicants have early feedback on deficiencies otherwise caught later in the permitting process.
 - New calculation template for applicants, which streamlines the MPCA review. These forms are not mandatory but made available to applicants to increase the efficiency of the technical review.
 - Increased communication on a set schedule with applicants during the permitting process means that projects keep moving with all parties, including consultants.
 - In addition to better communication with the applicants, an email inbox at: AQ.Permit.Forms.MPCA@state.mn.us for applicants to send in questions.

Land permitting program improvements

The Solid Waste permitting program has created a new permitting unit, bringing on an additional supervisor, permit engineers and hydrogeologists. With additional capacity, work is being redistributed so that permit engineers can specialize on specific industry sectors. These changes result in a larger number of staff working on permits in general, but also allows engineers to be experts on specific permit types, which facilitates their issuance of permits more quickly.

The Solid Waste permitting program has built automated reports that help supervisors and managers track the permitting process more closely. The creation of these tools will allow the program to look at areas of the process that are taking the most time and allow for the program to address them and create more efficiencies and shorten the timeframe for permits, from application to issuance.

Water permitting program improvements

Water permits make up a substantial portion of the total permit applications received by the agency each year and include some of the most technically complicated and controversial permits. The wastewater program is unique as it crosses three divisions of the MPCA working together toward a shared goal of protecting human health and the environment from the disposal of sewage and industrial waste. In the summer of 2024, leadership from the across the agency met over three days to evaluate how to ensure the cross-agency wastewater program supports a connected and transparent permitting system, with the goal of improving workflow and permit issuance timelines. Over the next four months, the wastewater program will initiate projects to create process efficiencies, including identify and sequence Municipal and Industrial permits ready for effluent limit review and improve cross-program permitting process flow with a shared understanding of roles and responsibilities.

The MPCA is committed to identifying opportunities for carrying out projects to implement improvements to create efficiencies in the permitting process, such as clarifying roles and responsibilities, setting achievable expectations and goals, and establishing planned communication across the program. The deployment of these improvements will include data collection and review to determine the degree of improvement achieved.

Data

Table 1: Tier 1 and Tier 2 permit applications from July 1, 2023 – June 30, 2024

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	121	2	6	113	104	100	4	93%	9	6	3
	Priority	2147	6	0	2141	2106	2095	11	99%	35	32	3
2	Non-priority	284	13	16	255	88	77	11	49%	167	99	68
	Priority	91	5	8	78	30	25	5	51%	48	29	19
TOTAL		2643	26	30	2587	2328	2297	31	95%	259	166	93

*% 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, 2024

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	11022	351	712	9959	6009	3721	2288	47%	3950	1978	1972
Priority	10437	80	193	10164	9548	9331	217	95%	616	366	250
TOTAL	21459	431	905	20123	15557	13052	2505	73%	4566	2344	2222

*% 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

Tier	Medium	Priority	Non-priority	Total
1	Air Permits		52	52
	Land Permits	5	4	9
	Water Permits	2,141	58	2,199
	Total	2,146	114	2,260
2	Air Permits	24	75	99
	Land Permits	13	23	36
	Water Permits	54	185	239
	Total	91	283	374
Grand Total		2,237	397	2,634

This table lists the count of all applications received by MPCA during FY 2024 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

		issued <= 90	issued > 90	pending <= 90	pending > 90	
Priority	Medium					Total
Priority	Land Permits	2		1	2	5
	Water Permits	2,092	11	31	1	2,135
Non-priority	Air Permits	39	3	4	1	47
	Land Permits	1		1	2	4
	Water Permits	56	1			57
	Total	2,190	15	37	6	2,248

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 2024 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 2024).

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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Tier 2 timeliness

		issued <= 150	issued <= 210	issued > 150	pending <= 150	pending <= 210	pending > 150	pending > 210	Total
Priority	Medium								
Priority	Air Permits			4	7		6		17
	Land Permits	5			3		5		13
	Water Permits	18	2	1	15	3	7	1	47
Non-priority	Air Permits	2		3	28		26		59
	Land Permits	2			9		9		20
	Water Permits	58	15	8	37	25	18	15	176
	Total	85	17	16	99	28	71	16	332

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 2024 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 2024.

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

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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
Air	Minor amendments for Solid Waste facilities
	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 - Air Permits	Master AI Name	Activity Type	Priority	Tier	App Received Date	Issuance Date	Days in house (rec'd to FY end)	Reasons for Delay
	3M Chemical Operations Cottage Grove Facility - Additives	Administrative Change	non-priority	2	11/15/2023		228	LACK;
	3M Chemical Operations Cottage Grove facility - Utilities	Permit Change - Minor	non-priority	2	11/9/2023		234	LACK;
	3M Chemical Operations' Cottage Grove facility - Additives	Administrative Change	non-priority	2	11/15/2023		228	LACK;
	acpi Wood Products LLC	Permit Change - Major	priority	2	7/13/2023		353	WAIT;
	Ag Processing Inc - Dawson	Part 70 Permit Reissuance	non-priority	2	8/10/2023		325	LACK;
	Al-Corn Clean Fuel LLC	Administrative Change	non-priority	2	8/17/2023	5/7/2024	264	NORS;
	American Peat Technology LLC	Part 70 Permit Reissuance	non-priority	2	12/19/2023		194	LACK;
	Archer Daniels Midland - Mankato	Permit Change - Major	priority	2	7/17/2023	5/13/2024	301	INCM;
	Ardent Mills Flour Mill	Part 70 Permit Reissuance	non-priority	2	10/9/2023		265	LACK;
	Benson Municipal Utilities	Part 70 Permit Reissuance	non-priority	2	1/29/2024		153	LACK;
	Cambria Co	Administrative Change	non-priority	2	7/24/2023		342	LACK;
		Permit Change - Major	priority	2	10/11/2023		263	LACK; WAIT;

**Medium
- Air
Permits**

Master AI Name	Activity Type	Priority	Tier	App Received Date	Issuance Date	Days in house (rec'd to FY end)	Reasons for Delay
CertainTeed LLC	Administrative Change	non-priority	2	10/12/2023	4/11/2024	182	NORS;
CHS Hallock	Administrative Change	non-priority	2	7/21/2023		345	LACK;
CHS Mankato	Permit Change - Minor	non-priority	2	11/15/2023		228	LACK;
	Permit Change - Major	priority	2	11/22/2023		221	WAIT;
District Energy Saint Paul Inc - Hans O Nyman	Permit Change - Minor	non-priority	2	10/3/2023		271	LACK;
Electro-Mechanical Industries Inc	Option D Issuance	non-priority	1	10/5/2023	1/8/2024	95	NORS;
Energy Center Minneapolis LLC	Administrative Change	non-priority	2	7/26/2023		340	LACK;
Gopher Resource LLC	Administrative Change	non-priority	2	9/11/2023		293	LACK;
Green Plains Fairmont LLC	Administrative Change	non-priority	2	9/25/2023		279	LACK;
	Administrative Change	non-priority	2	10/27/2023		247	LACK;
Heartland Corn Products	Administrative Change	non-priority	2	8/7/2023		328	LACK;
Koda Energy LLC	Permit Change - Major	priority	2	1/16/2024		166	LACK;
Madison WWTP	Option D Issuance	non-priority	1	8/29/2023	12/5/2023	98	NORS;
Mayo Medical Center - Rochester	Permit Change - Moderate	priority	2	8/10/2023	6/5/2024	300	WAIT;
Minnesota Power - Boswell Energy Center	Permit Change - Minor	non-priority	2	9/8/2023		296	LACK;

Medium - Air Permits	Master AI Name	Activity Type	Priority	Tier	App Received Date	Issuance Date	Days in house (rec'd to FY end)	Reasons for Delay
	Northern Iron LLC	Administrative Change	non-priority	2	10/13/2023		261	LACK;
	Northern Natural Gas Co - Faribault	Part 70 Permit Reissuance	non-priority	2	8/28/2023		307	LACK;
	Pine Bend Landfill	Administrative Change	non-priority	2	11/30/2023	5/13/2024	165	LACK;
	Plymold	Administrative Change	non-priority	2	9/27/2023		277	LACK;
	PotlatchDeltic Land and Lumber LLC - Bemidji Lumbermill	Permit Change - Minor	non-priority	2	11/3/2023		240	LACK;
	RDF Stevens LLC	Administrative Change	non-priority	1	1/23/2024		159	LACK;
	Shearer's Foods Perham LLC	Administrative Change	non-priority	2	9/1/2023		303	COMP;
	Sheldahl Flexible Technologies Inc - West Facility	Part 70 Permit Reissuance	non-priority	2	9/20/2023		284	LACK;
	Spectro Alloys Corp	Permit Change - Major	priority	2	9/20/2023	4/29/2024	222	WAIT;
	US Postal Service Management Support Service Ctr	Permit Change - Major	priority	2	12/4/2023	5/20/2024	168	LACK;
	US Steel Corp - MinnTac	Permit Change - Minor	non-priority	2	11/3/2023		240	LACK;
	Virginia Department of Public Utilities	Part 70 Permit Reissuance	non-priority	2	9/21/2023		283	LACK;
	West Fraser Bemidji	Permit Change - Major	non-priority	2	12/26/2023		187	LACK; WAIT; NORS;
	West Fraser US EWP - Bemidji	Administrative Change	non-priority	2	12/28/2023		185	LACK;

Medium - Air Permits	Master AI Name	Activity Type	Priority	Tier	App Received Date	Issuance Date	Days in house (rec'd to FY end)	Reasons for Delay
	Windom city of	Option D Issuance	non-priority	1	10/16/2023	1/24/2024	100	NORS;
	Windom Electric Plant	Option D Issuance	non-priority	1	10/16/2023	1/24/2024	100	NORS;
	Xcel Energy - Sherburne County Generating Plant	Permit Change - Major	priority	2	12/22/2023		191	LACK;
		Permit Change - Major	priority	2	1/8/2024		174	NORS;

Medium - Land Permits	Master Ai Name	Activity Type	Priority	Tier	App Received Date	Issuance Date	Days in house (rec'd to FY end)	Reasons for Delay
	BAE Systems Land & Armaments LP	Permit Reissuance	non-priority	2	12/1/2023		212	LACK;
	CHS Hallock	Permit Reissuance	non-priority	2	8/16/2023		319	LACK;
	Clay Demolition Landfill	Permit Reissuance	non-priority	2	10/3/2023		271	WAIT;
	Crow Wing County MMSW Landfill	Permit Reissuance	non-priority	2	1/17/2024		165	LACK;
	Dakota Area Transfer	Permit Issuance	priority	2	1/25/2024		157	LACK;
	Dan Reichert Property	Concrete Burial General Permit	priority	1	12/5/2023		208	
	Itasca County Demolition Landfill/MSW Transfer Station	Permit Change - Major	non-priority	2	10/10/2023		264	LACK; CHRG;
	Lyon County Demolition Landfill	Permit Reissuance	non-priority	2	1/16/2024		166	LACK;
	Lyon County Sanitary Landfill	Permit Reissuance	non-priority	2	1/17/2024		165	LACK;
	Mitchell Rohloff Property	Concrete Burial General Permit	priority	1	2/26/2024		125	
	Morrison County Sanitary Landfill	Permit Reissuance	priority	2	8/16/2023		319	LACK;

Medium - Land Permits	Master Ai Name	Activity Type	Priority	Tier	App Received Date	Issuance Date	Days in house (rec'd to FY end)	Reasons for Delay
	Northshore Mining Co	Permit Change - Minor	non-priority	1	3/14/2024		108	LACK;
	Northwoods Transfer Station	Permit Change - Major	non-priority	2	1/3/2024		179	WAIT;
	Olmsted County Kalmar Landfill	Permit Change - Minor	non-priority	1	10/16/2023		258	LACK;
	Pope/Douglas Solid Waste Management	Permit Change - Major	priority	2	9/20/2023		284	WAIT;
	Saint Louis County Regional Landfill	Permit Change - Major	priority	2	11/2/2023		241	LACK;
	U of M - Fay Thompson Center for Environmental Management	Permit Reissuance	non-priority	2	9/11/2023		293	LACK;
	United States Distilled Products Co	Permit Issuance	priority	2	12/27/2023		186	WAIT;

Medium - Water Permits	Master Ai Name	Activity Type	Priority	Tier	App Received Date	Issuance Date	Days in house (rec'd to FY end)	Reasons for Delay
	3M Hutchinson	Permit Change - Major	priority	2	7/31/2023		335	NORS;
	009-606-038	Coverage Issuance	priority	1	8/2/2023	2/27/2024	209	WAIT;
	ABA Water Systems Inc	Permit Reissuance	non-priority	2	10/2/2023		272	NORS;
	Albertville WWTP	Permit Reissuance	non-priority	2	9/19/2023		285	NORS;
	Austin WWTP	Permit Reissuance	non-priority	2	7/10/2023		356	NORS;
	Baarsch Farms LLC - Hollyhock	Coverage Issuance	non-priority	2	8/3/2023	1/4/2024	154	LACK;
	Bluestreak Dairy	Permit Issuance	non-priority	1	8/9/2023	2/29/2024	204	INCM;
	Campbell Extraction Pit	Coverage Issuance	non-priority	2	12/14/2023		199	NORS;
	Cargill Animal Nutrition	Permit Issuance	non-priority	2	11/2/2023		241	NORS;
	Columbus Collection System	Sewer Extension	priority	1	10/3/2023	1/19/2024	108	MISS;
	Daley Brothers LLC	Coverage Issuance	non-priority	2	8/3/2023		332	WAIT;
	Daley Farms of Lewiston LLP	Permit Issuance	priority	2	10/12/2023		262	WAIT;
	Dassel WWTP	Permit Reissuance	non-priority	2	7/17/2023		349	NORS;
	Deephaven Collection System	Sewer Extension	priority	1	9/13/2023	5/30/2024	260	NORS;
	DENCO II LLC	Permit Reissuance	non-priority	2	8/16/2023		319	NORS;

Medium - Water Permits	Master Ai Name	Activity Type	Priority	Tier	App Received Date	Issuance Date	Days in house (rec'd to FY end)	Reasons for Delay
	Denco II LLC - General Permit	Coverage Issuance	non-priority	2	8/16/2023	6/1/2024	290	NORS;
	Dennison WWTP	Permit Reissuance	non-priority	2	11/13/2023		230	NORS;
	Eden Prairie Well House 6 & 7	Coverage Issuance	non-priority	2	1/16/2024		166	NORS;
	Evansville Collection System	Sewer Extension	priority	1	12/26/2023	5/21/2024	147	NORS;
	Fields of Saint Croix WWTP	Permit Change - Major	priority	2	8/21/2023	2/7/2024	170	NORS;
	Fountain WWTP	Permit Reissuance	non-priority	2	11/29/2023		214	NORS;
	High Prairie Dairy LLC	Permit Issuance	non-priority	2	7/14/2023	6/14/2024	336	WAIT;
	ISD 2142 Pre-Kindergarten to Grade 12 N School	Permit Change - Major	priority	2	8/10/2023		325	NORS;
	J&B Feedlot	Coverage Issuance	non-priority	2	8/28/2023		307	WAIT;
	Keith Johnson Ellendale Site	Coverage Issuance	non-priority	2	8/18/2023	5/15/2024	271	WAIT;
	Lakefield WWTP	Permit Reissuance	non-priority	2	7/17/2023		349	NORS;
	Lanesboro WWTP	Permit Reissuance	non-priority	2	7/20/2023		346	NORS;
	Line 81 Red Lake River HDD Project	Permit Issuance	priority	2	12/14/2023		199	NORS;
	Mabel WWTP	Permit Reissuance	non-priority	2	11/30/2023		213	NORS;

Medium - Water Permits	Master Ai Name	Activity Type	Priority	Tier	App Received Date	Issuance Date	Days in house (rec'd to FY end)	Reasons for Delay
	Magnetation Plant 4	Permit Reissuance	non-priority	2	7/19/2023	7/1/2024	347	NORS;
	McGregor WWTP	Coverage Issuance	non-priority	2	9/11/2023		293	NORS;
	MDNR Crystal Springs State Fish Hatchery	Permit Reissuance	non-priority	2	9/25/2023		279	NORS;
	MDNR Peterson State Fish Hatchery	Permit Reissuance	non-priority	2	10/20/2023		254	NORS;
	Milestone Materials - Golberg Quarry	Permit Reissuance	non-priority	2	10/26/2023		248	NORS;
	Minneapolis Water Works - Fridley	Permit Reissuance	non-priority	2	1/10/2024		172	NORS;
	MNDOT Enterprise Rest Area	Permit Reissuance	non-priority	2	10/30/2023		244	NORS;
	Murdock WWTP	Permit Reissuance	non-priority	2	11/6/2023		237	NORS;
	North Oaks Collection System	Sewer Extension	priority	1	10/23/2023		251	MISS;
	Order of Saint Benedict WWTP	Permit Reissuance	non-priority	2	8/23/2023		312	NORS;
	Perham Resource Recovery Facility	Permit Reissuance	non-priority	2	10/27/2023		247	NORS;
	Rahr Malting Co	Permit Reissuance	non-priority	2	11/13/2023		230	NORS;

Medium - Water Permits	Master Ai Name	Activity Type	Priority	Tier	App Received Date	Issuance Date	Days in house (rec'd to FY end)	Reasons for Delay
	Randall Collection System	Sewer Extension	priority	1	9/11/2023	6/26/2024	289	NORS;
	Reading WWTP	Permit Issuance	priority	2	1/2/2024		180	NORS;
	Red Rock Rural Water System – Lindstrom WTP	Permit Issuance	priority	2	10/17/2023		257	NORS;
	Richland Grain Feedlot	Coverage Issuance	non-priority	2	8/18/2023	3/15/2024	210	LACK;
	Rosemount Collection System	Sewer Extension	priority	1	1/18/2024	6/13/2024	147	INCM;
	Saint Paul Regional Water Services McCarron WTP	Permit Change - Major	non-priority	2	12/4/2023		209	WAIT;
	Shakopee Collection System	Sewer Extension	priority	1	7/5/2023	10/24/2023	111	WAIT;
		Sewer Extension	priority	1	10/16/2023	2/14/2024	121	MISS;
	Staples WWTP	Permit Reissuance	non-priority	2	8/29/2023		306	NORS;
	Stephen WWTP	Coverage Issuance	non-priority	2	7/3/2023	1/2/2024	183	NORS;
	Stewart WWTP	Permit Reissuance	non-priority	2	10/2/2023		272	NORS;
	Tom Anderson Farm - Springfield	Coverage Issuance	non-priority	2	7/24/2023	12/29/2023	158	WAIT;

Medium - Water Permits	Master Ai Name	Activity Type	Priority	Tier	App Received Date	Issuance Date	Days in house (rec'd to FY end)	Reasons for Delay
	Trent Frederickson Farm - Sec 25	Coverage Issuance	non-priority	2	8/1/2023	5/9/2024	282	WAIT;
	Two Harbors WWTP	Permit Reissuance	non-priority	2	11/15/2023		228	NORS;
	Victoria Collection System	Sewer Extension	priority	1	8/24/2023	11/30/2023	98	INCM;
	Whispering Ridge Homeowners Association of Zimmerman Inc	Permit Change - Major	priority	2	1/16/2024		166	NORS;
	Willow River WWTP	Permit Reissuance	non-priority	2	8/14/2023		321	NORS;
	Windom Wash LLC	Permit Reissuance	non-priority	2	10/2/2023		272	NORS;
	Woods at Eagle Lake WWTP	Permit Change - Minor	non-priority	2	8/2/2023		333	NORS;
	WP38C - Property Structure Mitigation Master Agreement Construction Services (MACS)	Coverage Issuance	priority	1	12/21/2023	4/8/2024	109	INCM;