



Minnesota Pollution Control Agency

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Item 5K.
BCWMC 3-17-16

February 9, 2016

Mr. Jim de Lambert
Chair
Basset Creek Watershed Management Commission
7800 Golden Valley Rd
Golden Valley, MN 55427

RE: Response to comments on the Twin Cities Metropolitan Area Chloride Management Plan and Draft
Twin Cities Metropolitan Area Total Maximum Daily Load Report

Dear Mr. de Lambert:

Thank you for your comments on the Draft Twin Cities Metropolitan Area (TCMA) Chloride Management Plan (CMP) and Draft TCMA Chloride Total Maximum Daily Load (TMDL) report. Please see attached spreadsheet with your comments and our responses.

Thank you for taking the time to review and provide comments on the Draft TCMA Chloride Management Plan (CMP) and Draft TCMA Chloride Total Maximum Daily Load (TMDL) report. Your feedback has helped to improve the reports. Please feel free to contact me if you have further questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brooke C. Asleson".

Brooke C. Asleson
Watershed Project Manager
Metro Watershed Section
Watershed Division

BA:cp

Enclosure

CMP or TMDL	section	organization	comment	response to comment
			<p>The Commission is concerned that the approach used to develop the TMDLs and associated allocations was highly simplified and could make it difficult for future assessment and demonstration of compliance with the relevant water quality criteria – i.e., translating future modeling/monitoring data into a context that actually fits with how the standard will get applied given the variability in the residence times for each of the listed lakes and streams. This concern is further exacerbated by the fact that two of the TMDLs in the BQWMC watershed have watershed allocations that were assigned to industrial dischargers or wastewater sources. These combined wastewater sources were assigned 13 and 55 percent of the total loading capacity for Bassett Creek and Parkers Lake, respectively. Please provide BQWMC with the available monitoring data and permit conditions associated with all of the permitted wastewater sources in the watershed so that we can assess the magnitude and timing of these sources and what it might mean for future compliance with the chloride standard.</p>	<p>Chloride wastewater allocations for wastewater dischargers in the Bassett Creek watershed are not expected to complicate attainment of the water quality standard because they assume that effluent concentrations will be at or below applicable water quality standard concentrations. Upon permit reassessment each discharge will be evaluated for reasonable potential to cause or contribute to violations of the chloride water quality standard. Chloride water quality based effluent limits will be developed for discharges that exhibit potential to contribute to the impairments. Permits for dischargers that do not have a reasonable potential to cause or contribute to the violations of the water quality standard will include chloride monitoring requirements intended to ascertain that the discharge remains consistent with permitting assumptions. Only two of the dischargers in the watershed currently collect effluent chloride data.</p> <ul style="list-style-type: none"> Honeywell – Plymouth Operations has a Reverse Osmosis Reject Water discharge upstream of Medicine Lake. The permit does not contain a chloride limit but effluent data collected in 2007 and 2015 average only 6.6 mg/L (min = 1.7 mg/L; max = 47.6 mg/L). This discharge is not likely to require a chloride effluent limit in the future. Mediators has a Reverse Osmosis Reject Water discharge upstream of Parkers Lake. The permit contains a 100 mg/L effluent chloride limit. Effluent data reported since 2007 (34 data points) average 69.4 mg/L (min. = 28 mg/L; max. = 100 mg/L). The 100 mg/L limit ensures that the discharge will not cause or contribute to downstream chloride impairments. Other dischargers in the Bassett Creek watershed which will be evaluated for reasonable potential to cause or contribute to violations of the chloride water quality standard include: <ul style="list-style-type: none"> AdAcron Inc – is an untreated nonconcent cooling water discharge upstream of Parkers Lake. The facility's maximum permitted discharge rate is 0.995 mgd. Honeywell International Inc – is a treated nonconcent cooling water discharge to Bassett Creek. The maximum permitted discharge rate is 0.56 mgd. Approved water treatment/chemical additives include: <ul style="list-style-type: none"> Fremont 921 (sodium hexametaphosphate) for scale and corrosion control Chlorine for disinfection St. Louis Park WTP – WTP #8 (SD003) consists of sand pressure filters. The sand filters are backwashed into a holding tank every six days at the rate of 40,000 gallons per backwash. After a minimum of 24 hours of detention time, the tank discharges into the storm sewer system to Klinger Pond. Chemical additives that are used at the Facility include: <ul style="list-style-type: none"> Chlorine (disinfection) Fluoride (oral health) HMO (Radium Removal)
TMDL		Bassett Creek Watershed Management Commission	<p>In assigning the wasteload for MSds the allocation methodology first subtracts the background load and margin of safety, which will require runoff concentrations below 230 mg/L, yet it is our understanding that the wastewater sources are permitted to continuously discharge at a chloride concentration of 230 mg/L. It is suggested that these permitted sources should be subject to a lower allocation to better accommodate the margin of safety under all seasons and flow conditions.</p>	<p>There is a much higher level of certainty and control through monitoring of wastewater sources, which makes the Margin of Safety unnecessary for wastewater sources. Chloride wasteload allocations for wastewater dischargers in the Bassett Creek watershed are not expected to complicate attainment of the water quality standard because they assume that effluent concentrations will be at or below applicable water quality standard concentrations. Upon permit reassessment each discharge will be evaluated for reasonable potential to cause or contribute to violations of the chloride water quality standard. Chloride water quality based effluent limits will be developed for discharges that exhibit potential to contribute to the impairments. Permits for dischargers that do not have a reasonable potential to cause or contribute to the violations of the water quality standard will include chloride monitoring requirements intended to ascertain that the discharge remains consistent with permitting assumptions.</p>
			<p>The reports provide recommendations for future monitoring efforts but do not describe who will be responsible for the monitoring, how often the monitoring should occur and how the necessary resources will be provided. It will be especially important to plan for and devote enough resources future monitoring efforts, especially for watersheds that need to follow the "High Risk Monitoring Recommendations." Finally, the recommendations do not include any mention of how the monitoring programs should account for NPDES permitted dischargers within the impaired and "high risk" watersheds.</p>	<p>MFCA will continue coordinating monitoring with MCEs, and WMOs/WDs and as resources are available. NPDES WWTP permits will include chloride monitoring requirements when permits are renewed.</p>
TMDL		Bassett Creek Watershed Management Commission	<p>Much of the source material in these documents underestimate the chloride contributions from private applicators in the impaired watersheds. In addition, Section 8.3.3 of the TMDL indicates that the ordinance development and training elements of the Required Training Approach should be undertaken by the Cities within the impaired watersheds. This represents a poor allocation of resources for a source of chloride that could be controlled on a statewide/regional basis. The State should be promulgating the rules in place of an ordinance that each city would otherwise be responsible for certifying private application and that would require significant city interactions with individual landowners. The voluntary training approach described in Section 8.3.3 is also unlikely to succeed without significant expenditure of local resources to ensure that private applicators have the right equipment and training.</p>	<p>Thank you for the comment. There is also discussion in that section about the role that legislation similar to New Hampshire's limited liability law could have on reducing salt use by the private industry. There are numerous strategies that may be taken to address this source and the Chloride Management Plan is intended to lay out as many options that are reasonable. Statewide strategies for a possible certification program has been more explicitly called out in the Chloride Management Plan as a potential strategy to consider.</p>
TMDL	8.3.3	Bassett Creek Watershed Management Commission	<p>The TMDL report outline is inconsistent in several areas in that Section 3.7 is labeled as Permitted Sources, yet many of the subsections include many sources that are not subject to permit conditions (such as non-permitted sources, agriculture, natural background, etc.). In addition, Subsection 3.7.1.2 is included as part of the MSd Winter Maintenance Activities subsection, which is inconsistent with the categorization in the implementation strategies (Section 8). It is recommended that the subsection regarding Training, Lake Drainways, and Sidewalks only be aligned and discussed under the Non-permitted runoff from Winter Maintenance Activities subsection as these are sources of chloride that are not under the direct control of MSds. This will ensure consistency with Section 8.</p>	<p>The sections and subsections have been updated so that permitted and non-permitted sources are identified in the appropriate section.</p>
TMDL	3.7	Bassett Creek Watershed Management Commission	<p>The first paragraph of Subsection 3.7.1.2 is also confusing in that the third sentence states that commercial sources likely represent between 10 to 20 percent of the salt applied, but the last sentence indicates that commercial applications account for between 3 and 45 percent of the total salt usage in the TMDL. It is recommended that you remove the first reference as it is too narrowly defined and based on older information.</p>	<p>The sentence stating "commercial sources likely represent between 10 and 20 percent..." has been removed.</p>
TMDL	3.7.1.2	Bassett Creek Watershed Management Commission		