



CITY OF
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MINNESOTA

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Todd Smith, P.E.
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155
todd.smith@state.mn.us

Re: MPCA Authorization to Discharge Stormwater Associated with Construction Activity General Permit Revisions

Dear Mr. Smith:

The following are our review comments of the proposed permit changes to the MPCA Authorization to Discharge Stormwater Associated with Construction Activity.

Section 8.6

Permit Language: For projects, including a common plan of development or sale, disturbing 25 or more acres, stabilization must be initiated immediately when construction activity has permanently or temporarily ceased on any portion of the site and will not resume for a period exceeding 7 calendar days. Stabilization must be completed no later than 7 calendar days after the construction activity has ceased.

Comment 1: If the site was phased to where they only disturbed 10 acres at a time could the timeframe be lengthened to 14 days? This might encourage site phasing, etc. Use the same acreage as required for temporary sediment basins. 10 acres and 5 acres depending on receiving water.

Section 10.1

Permit Language: Permittees must visually check and photograph the discharge at the beginning and every 4 hours of operation to ensure adequate treatment has been obtained and nuisance conditions will not result from the discharge.

Comment 1: A distinction should be made for clean water dewatering (groundwater, clean surface waters, etc.). Well point dewatering operations are typically clear water and should not need to be documented every 4 hours. Perhaps document the conditions at the start of the operation and if the water remains visibly clear eliminate the need to document the dewatering operation every 4 hours thereafter. The same could hold true if needing to dewater a surface water (constructed pond) and if the water remains clear then no need to continue monitoring. These dewatering operations are typically of a longer duration and maintaining photos every 4 hours when the pumps are running continuously for weeks is not feasible.

We thank you for the opportunity to review the draft permit changes. We look forward to discussing these comments with you further. If you have any questions regarding these comments, please feel free to contact me at jcarlson@cityofsavage.com or 952-882-2686.

Sincerely,
City of Savage

A handwritten signature in blue ink, appearing to read "Jesse Carlson".

Jesse Carlson
Water Resource Manager