



June 12, 2023

Laura Geyen
Municipal Division
Minnesota Pollution Control Agency
520 Lafayette Road
St. Paul, MN 55125

RE: Notice of Intent to Issue Wastewater Permit
Wilmes Lake Alum Treatment Facility
Permit: MN0071749

Dear Ms. Geyen:

The Metropolitan Council has reviewed the Minnesota Pollution Control Agency's intent to issue a wastewater permit for the above-referenced project and offer the following review comments.

The Metropolitan Council is statutorily responsible for the regional collection and treatment of wastewater services within the 7-county metropolitan area. We currently provide wholesale wastewater services to a total of 111 communities. We operate 9 regional wastewater treatment facilities, each under a National Pollution Discharge Elimination Permit (NPDES).

The proposed project is located in Woodbury, MN, in an area that is provided regional wastewater service through the Council's Eagles Point Wastewater Treatment facility (NPDES Permit MN0029904).

The above referenced proposed permit is for a surface water alum treatment facility that proposes influent flow to Wilmes Lake will be treated through dosing it with alum to remove dissolved phosphorus through coagulation and settlement. The proposed permit states that the solids will be removed by one of the following practices:

1. Periodic mixing of pond sediment and discharging to the sanitary sewer, or
2. Dredging and hauling either thickened or dried solids for land filling.

The Eagles Point NPDES permit currently has limits for phosphorus.

Due to the potential impact that the phosphorus-rich sediment might pose to our Eagles Point facility, or our permit, the Council needs to review the strength characteristics of the material to determine its acceptability into the regional wastewater collection and treatment system. Preliminary findings appear to show that periodic introduction of the treatment pond sediment will adversely impact the treatment process and increase risk for permit non-compliance events. Further study is necessary to determine the full potential impact that this pond sediment material may have on the treatment process.

Therefore, the Council requests that the alternatives for disposing of the treatment pond sediment into the local sanitary sewer system be removed from the proposed permit until such a time that its impacts can be fully evaluated. We hope to have the conclusions of this study within the next 60 days.

If you have any questions, or require any additional information related to the above comments, please don't hesitate to contact, Kyle Colvin, Manager Wastewater Programs & Community Programs, at 651-602-1151, or kyle.colvin@metc.state.mn.us.

Sincerely,

Sam Paske

Sam Paske (Jun 12, 2023 13:28 CDT)

Sam Paske
Assistant General Manager, Environmental Services - Planning

C: Tony Kutzke, City Engineer, City of Woodbury
Martina Nelson, Manager, Industrial Waste, MCES
Rene Heflin, Manager, Plant Engineering, MCES
Terry Gilchrist, Environmental Analyst, MCES