

Re: City of St. Louis Park (Reilly Tar site) - Wastewater Permit

Permit Number: MN0045489

Dear Sir or Madam,

Thank you for the opportunity to comment on the draft wastewater permit for the City of St. Louis Park's Reilly Tar site. I am Faith Alpaugh, a conservation scientist and lifelong resident of Hennepin County, Minnesota. I will be graduating from the University of Wisconsin-River Falls with a Bachelor's degree in conservation and environmental planning this spring. I felt compelled to make a public comment on this permit draft because I care about the quality of the water in my county and how it impacts people and the environment.

I am in favor of finalizing the draft of the permit that outlines the rules and regulations regarding the disposal of wastewater into South Oak Pond and into the unnamed wetland by the City of St. Louis Park, Minnesota. The detail contained in the draft helps the City of St. Louis Park, the Minnesota Pollution Control Agency (MCPA), and the public who may be affected by the water treatment practices understand what is required of the parties involved, how they will be kept accountable, and the goals of monitoring the water quality. After reading the draft several times, the federal and state laws referenced in the draft, previous reports on the project, and information on polycyclic aromatic hydrocarbons (PAHs) provided by the Center for Disease Control (CDC), I have two points I want to make in my feedback.

First, according to the CDC, exposure to PAHs can pose risk to human health, as many of the chemicals in PAHs are considered by scientists to be carcinogens (*Polycyclic Aromatic Hydrocarbons (PAHs) Factsheet | National Biomonitoring Program | CDC, n.d.*). I observed in the Statement of Basis document for the permit draft, from January 2024, on page 2, under the section titled "Significant changes from the previous permit", that the toxic equivalency factor (TEF) for "Group I, Carcinogenic PAHs" is to be added to the permit (*Statement of Basis, 2024*). I believe this is an excellent addition to the permit because as PAHs have the capability of causing cancer, the TEFs to these chemicals in the permit will cause the City of St. Louis Park to act more urgently to reduce and/or or eliminate these chemicals, if they should be detected in a water sample.

Second, under the same section in Basis of Statement document for the draft permit, it noted that the detection limit of phosphorus levels was going to be reduced to 0.03 mg/L (*Statement of Basis, 2024*). I am curious to know what the maximum level was before but did not find any documents that showed that information. According to a document from the Environmental Protection Agency on total phosphorus, it reported that the acceptable range of phosphorus levels in water is 10-40 µg/L (*Total Phosphorus, 2009*). That is the equivalent of 0.01-0.04 mg/L. Phosphorus is the main cause of eutrophication, which is seen in algal blooms. Those algal

blooms, according to the EPA, can then release toxins that are harmful to human health (*Indicators: Phosphorus | US EPA*, 2023). Knowing this data, I am pleased to see that the detection limit is being reduced.

I felt the inclusion of TEFs in the permit draft and the reduced detection limit of phosphorus levels were worth mentioning in my public comment because I think they will have the greatest impact on reducing the risk to human health. PAHs have chemicals that are considered carcinogens, which are a major threat to human health. Phosphorus causes environmental harm with the resulting algal blooms from eutrophication, that then causes human harm with the production of algal toxins. These two edits put human health first, and with its implementation and the implementation of the other changes, the quality of the water will improve.

I have the webpages and documents I looked over listed at the bottom of this letter if you wish to know where I got my information and based my thoughts on. I thank you again for the opportunity to make a public comment on this permit draft.

Sincerely,

Faith Alpaugh

Conservation Student at University of Wisconsin-River Falls

Bachelor of Science – Conservation and Environmental Planning, 2024

#### Bibliography

*Indicators: Phosphorus | US EPA*. (2023, June 9). US EPA. <https://www.epa.gov/national-aquatic-resource-surveys/indicators-phosphorus>

*Polycyclic Aromatic Hydrocarbons (PAHs) Factsheet | National Biomonitoring Program | CDC*. (n.d.). [https://www.cdc.gov/biomonitoring/PAHs\\_FactSheet.html](https://www.cdc.gov/biomonitoring/PAHs_FactSheet.html)

*Statement of Basis*. (2024, January). Minnesota Pollution Control Agency. [https://scs-public.s3-us-gov-west-1.amazonaws.com/env\\_production/oid333/did200071/pid\\_208365/project-documents/Statement%20of%20Basis%20-%20MN0045489%20-%202024.pdf](https://scs-public.s3-us-gov-west-1.amazonaws.com/env_production/oid333/did200071/pid_208365/project-documents/Statement%20of%20Basis%20-%20MN0045489%20-%202024.pdf)

*Total Phosphorus*. (2009). United States Environmental Protection Agency. <https://nepis.epa.gov/Exe/ZyPDF.cgi/P10070OR.PDF?Dockey=P10070OR.PDF>

## Other Resources

*Dioxin and Dioxin-Like Compounds Toxic equivalency information | US EPA.* (2024, February 20). US EPA. <https://www.epa.gov/toxics-release-inventory-tri-program/dioxin-and-dioxin-compounds-toxic-equivalency-information>

*Executive Summary: Title: Consent Decree and Remedial Action Plan for the Reilly Tar Superfund Site.* (2019). St. Louis Park Minnesota. <https://www.stlouisparkmn.gov/home/showdocument?id=14178>

*National Pollutant Discharge Elimination System/State Disposal System MN0045489.* (2024). Minnesota Pollution Control Agency. [https://scs-public.s3-us-gov-west-1.amazonaws.com/env\\_production/oid333/did200071/pid\\_208365/project-documents/Draft%20Permit%20-%20MN0045489%20-%202024.pdf](https://scs-public.s3-us-gov-west-1.amazonaws.com/env_production/oid333/did200071/pid_208365/project-documents/Draft%20Permit%20-%20MN0045489%20-%202024.pdf)

*Polycyclic Aromatic Hydrocarbons (PAHs) | ToxFAQs™ | ATSDR.* (n.d.). <https://wwwn.cdc.gov/TSP/ToxFAQs/ToxFAQsDetails.aspx?faqid=121&toxid=25>

*Recommended Toxicity Equivalence Factors (TEFs) for Human Health Risk Assessments of 2,3,7,8- Tetrachlorodibenzo-p-dioxin and Dioxin-Like Compounds.* (2010, December). United States Environmental Protection Agency. <https://www.epa.gov/sites/default/files/2013-09/documents/tefs-for-dioxin-epa-00-r-10-005-final.pdf>