

August 29, 2024

Emily Schnick
520 Lafayette Road North
St. Paul, MN 55155-4194
Phone: 651-757-2699
Email: emily.schnick@state.mn.us

RE: Comments on the re-issuance of the draft MPCA wastewater permit for the 3M Chemical Operations manufacturing facility in Cottage Grove

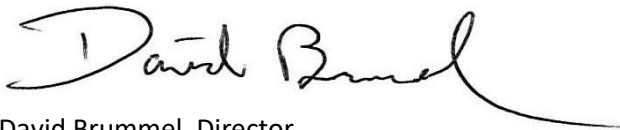
Dear Emily Schnick,

Washington County Public Health & Environment (PHE) is submitting comments to the Minnesota Pollution Control Agency (MPCA) in response to the request for public comment on the draft wastewater permit for the 3M Wastewater Chemical Operations Facility in Cottage Grove. The county reviewed the permit for consistency with county policies, such as the 2014-2024 Groundwater Plan and the Hazardous Waste Management Ordinance.

PHE has the following comments regarding the permit:

1. No additional environmental contamination at any level should occur from the re-permitting of operations on this property.
2. PHE requests that 3M provides updates on the development construction, operational reporting performance and any exceedances or non-compliance with approved or new standards for wastewater treatment at this facility. This includes any unplanned or emergency events, and those caused by natural weather phenomena and other factors.
3. PHE supports the increased requirement of priority pollutant testing from twice to four times per year. However, the permit also identifies that non-target PFAS analysis shall be conducted at a minimum frequency of once every five years of the water required to be monitored at all locations in this permit. Due to ongoing changes in PFAS monitoring technology, PHE encourages the MPCA to incorporate this testing to be conducted at a minimum frequency of once per year as part of the facility permit conditions.
4. If any changes or events occur at the 3M Chemical Operations manufacturing facility in Cottage Grove with respect to the use of the wastewater treatment facility PHE requests that 3M report these directly to PHE, in addition to their other reporting requirements.

Sincerely,

A handwritten signature in black ink that reads "David Brummel".

David Brummel, Director
Washington County Public Health and Environment

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