

Gerrit VanderWaal

Thank you for the opportunity to comment on this wastewater permit. Below are suggestions:

1. Add a figure depicting SW locations.
2. Add a figure depicting WS locations, when feasible.
3. Throughout the permit, use only the method detection limit (MDL) and reporting limit (RL) convention. "Detection level" and "detection limit" were observed in various locations and their relation to MDL/RL is undefined.
4. Section 5.1.1: Define "DMR" here or in preceding pages; the only apparent definition is the URL on page 1.
5. Section 5.2.9, 5.4.9:
 - Change existing wording to "Method detection limits for all priority pollutant analyses shall be below the Class 2B Chronic Standard, whenever analytically possible. [Minn. R. 7050.0222.4]"
 - Require submission of analytical data using the Lab_MN electronic data deliverable format to the MPCA's EQuIS database (or other electronic database as applicable), as mentioned on page 413.
6. Section 5.2.11, 5.4.11: Remove cyanide paragraph: redundant to contents of 5.2.9/5.4.9.
7. Section 5.41.4, 5.43.4: Change "any PFAS compound above a MDH Health Based Value (HBV)" to "any PFAS compound above the lowest published MDH Health Based Value (HBV) or Health Risk Limit (HRL)". HBVs aren't published for most PFAS and for the PFAS with HBV/HRLs, several HBV/HRLs are published, and the existing wording is ambiguous.
8. Section 5.66.42:
 - Change "deliver to a certified lab within the maximum holding times." to "deliver to a certified lab with sufficient time so the lab can complete analysis within the maximum holding times.", or similar. For example, as currently worded, if a holding time is 24 hours (common for hexavalent chromium), the permittee can deliver samples at 23 hours 59 minutes, making it nearly impossible for the lab to complete analysis within holding times.
 - Add similar section to all locations.
9. Section 5.69.76: Define WQBEL.
10. Section 5.69.85: Define "detection level" - is this the MDL? The detection limit?
11. Section 5.69.94: Add language stipulating the meeting is to occur after 6pm to ensure maximum public participation.
12. Section 5.79.404: Define "representative" - are these grab samples, as stipulated in 5.69.117?
13. Page 412: Add information and require samplers to follow PFAS best practices; for example,

the use of field blanks and PFAS-free clothing/equipment.

14. Page 413: Change "MN Lab" to "Lab_MN". Consider linking to the MPCA Remediation Division's webpages explaining the Lab_MN format.