

## Met Council

Attached is the comment submitted by Met Council.



September 23, 2024

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*Via Email*

**Re: Metropolitan Council Comments - Blue Lake NPDES/SDS Draft Permit MN0029882**

Dear Ms. Mikkelson:

The Metropolitan Council Environmental Services appreciates the opportunity to review and comment on the Blue Lake NPDES/SDS Permit and Factsheet. The comment is contained in this letter.

**Met Council Comment on Public Draft NPDES/SDS Permit**

**Page 22, Sections 5.15.74-75**

MPCA Draft Language:

*Aerated Pond System*

5.15.74 *Pond Observations. [Minn. R. 7001]*

5.15.75 *The Permittee shall inspect the aerated pond system at a minimum frequency of once per week and shall:*

*A. Take measurements of the pond water depth;*

*B. Estimate the coverage of aquatic plants, floating mats, and ice cover on the surface of the pond(s); and*

*C. Note odors, the condition of the dikes, and the presence of rodents.*

*The Permittee shall maintain records of these weekly inspections for at least three years and submit the results as an attachment to the eDMR. [Minn. R. 7001.0150, Subp. 3(F)]*

**Met Council Comment:**

The pond does not currently provide flow equalization, flood control or treatment for the extremely rare possibility of a bypass. We understand the weekly inspection primarily is to ensure pond liner integrity. The Permittee believes flow measurement to be a more effective method to monitor the pond liner for leakage, given its operation as a continuous flow-through unit with a short (~1 day) hydraulic detention time. Met Council proposes to replace the requirements in the permit with the language suggestion below.

*Aerated Pond System*

5.15.74 *Pond Observations. [Minn. R. 7001]*

5.15.75 *The Permittee shall measure and document daily totalized plant influent and effluent flows (to be documented monthly on supplemental report form).*

Sincerely,

Terry Gilchrist - Met Council Environmental Analyst