



December 9, 2024

Minnesota Pollution Control Agency (MPCA)

RE: Minnesota Biosolids PFAS Strategy for land application of biosolids

To whom it may concern:

Thank you for the opportunity to comment on the Minnesota Biosolids PFAS Strategy. Below are comments from Dakota County staff:

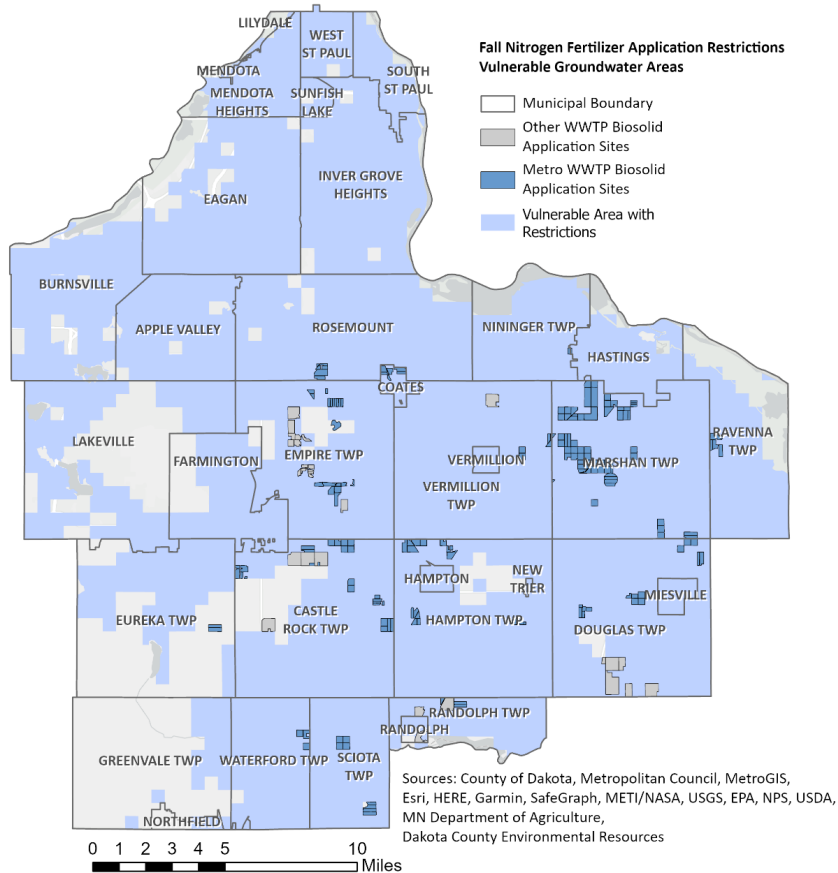
1. Recommend the land application of biosolid rules to only allow non-food crops, like biofuels and other crops not to be consumed by humans or livestock, to be grown on fields where biosolids have been applied.
2. Tier 1: PFOA or PFOS concentrations $\leq 19 \mu\text{g/kg}$. Consider adding the requirement to provide the landowner and farmer (if different than the landowner) with the PFAS results which is not currently in the strategy.
3. Tiers 1 thru 3. The landowner and farmer (if different than the landowner) should sign an agreement that clearly includes the PFAS results in the material to be spread and the concern that edible crops could uptake the PFAS from the soil and enter the food supply.
4. Past pesticide usage, biosolid and manure application can contribute to the PFAS load in the soil at approved biosolid application sites. Recommend adding the requirements that all land application sites have representative soil samples collected and analyzed for EPA Method 1633. The PFOA and PFOS results should be added to the WWTF biosolids proposed to be land applied and the applicable tier criteria utilized.
5. Ash from incinerating WWTP biosolids has been buried in Dakota County, used as fill and combined with sludge and applied to fields in a product called Nutra lime. This ash likely contains PFAS and the threat to groundwater is unknown. A strategy to study and determine the risk to the environment related to the buried and land applied ash is warranted.
6. A strategy that examines past biosolid application sites that do not meet isolation distances to surface water should be evaluated to determine risk.
7. The MN Department of Agriculture (MDA) designated Vulnerable Groundwater Areas, ([Vulnerable Groundwater Area Map](#)), where the fall application of nitrogen fertilizer is restricted. Biosolids from WWTF are typically applied in the spring and fall in Dakota County. Recommend adding fall application restrictions for biosolids in Vulnerable Groundwater Areas where agriculture use of fertilizer is not allowed consistent with the MDA Groundwater Protection Rule. The below map shows there are many known biosolid application sites within Dakota County Vulnerable Groundwater Restriction Areas.

Environmental Resources



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For questions please contact Valerie Neppl, contact information provided below.

Sincerely,

Valerie Neppl

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cc: Nikki Stewart, Environmental Resources Department Director

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