

Prairie Island Indian Community

3M Cottage Grove Facility NPDES Permit Comment Items

1/23/25

1. In the event that MPCA allows 3M to adopt a reduced monitoring frequency following a 12-month period with no detection of a particular pollutant at a given monitoring location, one annual sample seems insufficient to reliably determine on an on-going basis that the pollutant is truly absent from the effluent. One sample annually is simply a “snapshot” and is not characteristic of a year’s worth of discharge. Page 65 of the NPDES/SDS Permit Program Fact Sheet references Figure 11 and alludes to the fact that there is significant variability in discharge from the facility. This supports the notion that a single annual sample is insufficient to accurately capture true concentrations and total load.
2. A reduced monitoring frequency for the select 37 PFAS compounds from a monthly interval to an annual interval is questionable. This drafted change benefits 3M as a cost-saving measure but does not benefit the public or our ecosystems. A polluter should be able to accurately quantify what they are putting into a precious shared resource.
3. 3M should provide notice of public meetings to all communities in the Settlement Priority 2 project area, the Prairie Island Indian Community, and all downstream communities on Pool 2 of the Mississippi River, not just the East Metro, as those communities are affected as well.
4. Facilities should not be allowed to discharge levels of pollutants that threaten beneficial uses during the period in which they have not met the requirements of the permit. If a facility cannot ensure safe effluent levels, they should not be discharging into a shared and essential resource until such time that they can meet protective criteria.
5. If not already, the Annual PFAS Removal and Disposal Reports should be made publicly available.
6. Detailed information regarding Enforcement Actions should be publicly available. The public should have access to clear and transparent information about previous permit violations in order to make informed comment on draft permits and consumer choices.
7. Justification for the exclusion of PFHxA from effluent limitations should be provided in the permit.
8. The removal of the phrase “permittee plans to phase out all PFAS manufacturing” is questionable and warrants further explanation.
9. More information should be provided on the Toxicity Reduction Evaluation plan, such as how MPCA will define successful progress and what measures will be taken if these expectations are not met.