

Laura Mammoser

Mr. Moon,

I am an environmental consultant working with industrial facilities in Minnesota.
Please see my comments attached.

Thank you,
Laura Mammoser



February 21, 2025

Multi-Sector General Permit for Industrial Stormwater
Mr. Matthew Moon
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155-4194

RE: Multi-Sector Stormwater Associated with Industrial Activity – Permit Number: MNR05000

To Mr. Moon:

Section 18.5: Industrial stormwater ponds and infiltration systems must not contribute to a pollutant or contaminant spread to a greater extent or magnitude in locations where pollutants or contaminants exist in the soil or the shallow aquifer and under other regulatory authority. A qualified professional shall conduct a site analysis evaluating for extent and magnitude of impact solid and groundwater and file a report with the SWPPP for any pollutant or contaminant on site.

Please clarify that the above-mentioned requirement is only applicable if there is known soil or groundwater contamination.

Section 23.1: The Permittee shall evaluate and document all non-stormwater discharges and eliminate all discharges not authorized by this permit or a separate NPDES/SDS permit. The Permittee shall document the evaluation with the SWPPP, and must include: A. The date of any evaluation; B. A description of the evaluation criteria used; C. A list of monitoring locations the Permittee observes during the evaluation; D. The different types of non-stormwater discharges and source locations; and E. The action(s) taken, such as a list of control measures used to eliminate any unauthorized discharge(s) the Permittee identifies. [Minn. R. 7090]

What frequency is the non-stormwater discharge certification required?

Section 46.2: The Permittee does not need to collect additional samples for any parameter where the averaged results of the four most recent quarterly samples are below the permit benchmark value, unless a new impairment to receiving water is listed by the state and meets the conditions in the Benchmark Monitoring for New Impairment Listing to A Receiving Water section. [Minn. R. 7090]

If the facility has met the benchmark testing under the previous permit term (2020-2025), are they required to start benchmark testing for an additional four quarters when this permit term becomes effective this year?

Sincerely,

Laura Mammoser
Schebel Environmental PLC