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DRAFT

June 20, 2022

Ashley Wahl, Environmental Specialist
Municipal Division
Minnesota Pollution Control Agency
504 Fairgrounds Rd #200
Marshall, MN 56258
ashley.wahl@state.mn.us

RE: Effluent Limitations Summary
Marshall Wastewater Treatment Facility
NPDES/ SDS Permit No. MN0022179

Dear Ms. Wahl:

Thank you for the opportunity to review the proposed effluent limits for the City of Marshall, Minnesota. The following is a summary of comments regarding the pre-public notice documents for the Marshall WWTF National Pollutant Discharge Elimination (NPDES) permit reissuance. Review comments were provided by the City of Marshall, Bolton & Menk, Inc., and the Minnesota Environmental Science and Economic Review Board (MESERB).

Information requested pertaining to the existing schedules of compliance (SOC) total chlorides:

The City of Marshall has implemented significant capital improvements at the water treatment facility to provide residents of the community with softer water. The next step in reducing the level of chlorides in the wastewater stream is to reduce the amount of salts discharged by individual water softener units. The City has received a 2022 grant from the MPCA to provide rebates for high-efficiency water softeners and to provide the public with education on how to adjust water softener cycles to match the softer water being produced by the recently upgraded WTP or purchase new more efficient water softeners to help in the reduction of chlorides being discharged. The rebate program is being rolled out this summer with implementation over the next year.

In addition to addressing the chlorides discharged by individual water softener units, the City is also working with its Significant Industrial Users (SIU) in identifying and reducing the levels of chloride being discharged by industries to the wastewater system.

These mitigation efforts represent a significant investment by the community in reducing the chloride levels in the wastewater. The City believes that the rebate program and public education process will require additional time to get the public to buy in on the effectiveness of the systemwide changes. In addition, the significant industrial users need time to make adjustments to their systems in order to minimize the economic impact on these customers while mitigating the discharge of chlorides. The City believes that additional time may be required beyond the current compliance date of April 1, 2024, to implement these changes. As such, the City will begin the process of applying for a variance in case additional time is needed.

Information requested pertaining to the existing SOC for total copper:

The April 1, 2022 letter has the Calendar Month Average and Daily Maximum concentrations reversed from the levels listed in the permits. We believe the Calendar Month Average should be listed as 26 ug/L, and the Daily maximum listed as 42 ug/L.

As you noted in the April 1, 2022 letter, the WWTF effluent has consistently met the total copper limits since late 2014 when the Marshall Public Utilities adjusted the polyphosphate feed at the water treatment facility to provide better corrosion protection throughout the city's water distribution system. The City is requesting that the Reasonable Potential Evaluation for Copper be reviewed, and the copper limits ultimately removed from the NPDES permit.

Information requested pertaining to the newly proposed RES-based total phosphorus (TP) limit:

As noted in your letter, the WWTF will be able to meet the proposed mass limit of 13.3 kg/day of total phosphorous discharge under current operating conditions. In order to evaluate the conditions which may cause issues with meeting this limit, or with meeting any future proposed limit, the City will need to complete comprehensive planning for the community and prepare an updated facility plan for the wastewater treatment facility.

Discussion of chronic Whole Effluent Toxicity (WET) limit:

The City will continue with the Toxicity Reduction Evaluation process and will perform tests as required.

Information on SOC pertaining to newly proposed TDS and sulfate limits:

The City is currently working with its SIUs to determine the impact of SIU contributions on the sulfate levels in the WWTF effluent and potential mitigation measures. Once this evaluation is completed, the City will complete an evaluation of alternatives for the proposed limit. At this time, the City requests until April 1, 2024, to determine if the sulfate limit can be met or if the City will be requesting a variance.

The Reasonable Potential Evaluation that was completed for TDS utilized all data available. Of all the data points used, only four of the points were obtained after the upgrades to the water plant were brought online and optimized. Sampling since shows levels well below the proposed limit. The City is requesting that TDS remain in a monitor-only status and another Reasonable Potential Evaluation be completed.

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In conclusion, please consider the enclosed comments and requests prior to preparing the pre-draft NPDES permit for City review. The City would appreciate the opportunity to discuss the proposed effluent limits and necessary improvements associated with compliance at your convenience.

Sincerely,

Scott Truedson
Wastewater Treatment Facility Superintendent

cc: Robert J. Byrnes, Mayor of Marshall
Kelly Yahnke, Bolton & Menk, Inc.
Kris Swanson, Bolton & Menk, Inc.
Jon Peterson, Bolton & Menk, Inc.