



Bassett Creek Watershed Management Commission

DRAFT

August 11, 2015

Brooke Asleson
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155

Re: Bassett Creek Watershed Management Commission Comments on Draft Twin Cities Metropolitan Area Chloride Management Plan and TMDL Reports

Dear Ms. Asleson:

Thank you for the opportunity to provide comments on the draft Metro Area Chloride Management Plan and TMDL report. The Bassett Creek Watershed Management Commission (BCWMC), which currently has listed impairments for Bassett Creek, Plymouth Creek, Parkers Lake, Sweeney Lake, Wirth Lake and Spring Lake, respectfully submit the following list of comments on the Minnesota Pollution Control Agency's (MPCA) draft reports:

- The Commission is concerned that the approach used to develop the TMDLs and associated allocations was highly simplified and could make it difficult for future assessment and demonstration of compliance with the relevant water quality criteria—i.e., translating future modeling/monitoring data into a context that actually fits with how the standard will get applied given the variability in the residence times for each of the listed lakes and streams. This concern is further exacerbated by the fact that two of the TMDLs in the BCWMC watershed have wasteload allocations that were assigned to industrial dischargers or wastewater sources. These combined wastewater sources were assigned 13 and 55 percent of the total loading capacity for Bassett Creek and Parkers Lake, respectively. Please provide BCWMC with the available monitoring records and permit conditions associated with all of the permitted wastewater sources in the watershed so that we can assess the magnitude and timing of these sources and what it might mean for future compliance with the chloride standard.
- In assigning the wasteload for MS4s the allocation methodology first subtracts the background load and margin of safety, which will require runoff concentrations below 230 mg/L, yet it is our understanding that the wastewater sources are permitted to continuously discharge at a chloride concentration of 230 mg/L. It is suggested that these permitted sources should be subject to a lower allocation to better accommodate the margin of safety under all seasons and flow conditions.
- The reports provide recommendations for future monitoring efforts but do not describe who will be responsible for the monitoring, how often the monitoring should occur and how the necessary resources will be provided. It will be especially important to plan for and devote enough resources to future monitoring efforts, especially for watersheds that need to follow the

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“High Risk Monitoring Recommendations.” Finally, the recommendations do not include any mention of how the monitoring programs should account for NPDES permitted dischargers within the impaired and “high risk” watersheds.

- Much of the source material in these documents underestimates the chloride contributions from private applicators in the impaired watersheds. In addition, Section 8.3.3 of the TMDL indicates that the ordinance development and training elements of the Required Training Approach should be undertaken by the Cities within the impaired watersheds. This represents a poor allocation of resources for a source of chloride that could be controlled on a statewide/regional basis. The state should be promulgating the rules in place of an ordinance that each city would otherwise be requiring for certified private applicators and that would require significant city interactions with individual landowners. The Voluntary Training Approach described in Section 8.3.3 is also unlikely to succeed without significant expenditure of local resources to ensure that private applicators have the right equipment and training.
- The TMDL report outline is inconsistent in several areas in that Section 3.7 is labeled as Permitted Sources, yet many of the subsections include many sources that are not subject to permit conditions (such as non-permitted sources, agriculture, natural background, etc.). In addition, Subsection 3.7.1.2 is included as part of the MS4 Winter Maintenance Activities subsection, which is inconsistent with the categorization in the implementation strategies (Section 8). It is recommended that the subsection regarding Parking Lots, Driveways, and Sidewalks only be placed and discussed under the Non-permitted Runoff from Winter Maintenance Activities subsection as these are sources of chloride that are not under the direct control of MS4s. This will ensure consistency with Section 8.
- The first paragraph of Subsection 3.7.1.2 is also confusing in that the third sentence states that commercial sources likely represent between 10 to 20 percent of the salt applied, but the last sentence indicates that commercial applications account for between 5 and 45 percent of the total salt usage in the TCMA. It is recommended that you remove the first reference as it is too narrowly defined and based on older information.

Please contact Commission Engineer, Greg Wilson at Barr Engineering (952-832-2672 or gwilson@barr.com) if you have questions regarding these comments. Thank you.

Sincerely,

Jim de Lambert, Chair