



January 14, 2020

Justin Wagner
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Northfield, MN 55057

Holly Mikkelson
Environmental Specialist
Minnesota Pollution Control Agency
520 Lafayette Rd
St. Paul, MN 55155
Holly.Mikkelson@state.mn.us

Re: Pre-Public Notice Draft
NPDES/SDS Permit No. MN0024368
Northfield WWTP

Dear Holly Mikkelson,

This is the formal response to the Pre-Public Notice Draft of the City of Northfield's Wastewater Treatment Facilities NPDES/SDS permit letter from the MPCA dated December 5, 2019 to the City of Northfield.

The City has reviewed the Pre-Public Notice Draft and has identified a few areas of question regarding the new permit and permit language.

- Page 3 of 34 – 4th paragraph, regarding the biosolids treatment system, the wastewater treatment plant does not have belt filter presses for dewatering, the presses are screw presses. The language also may want to reference the bioset process.
- Page 10 of 34 – 5.6.15 – The “12-Month Moving Total” for phosphorous is a change from calendar year to date total, why is there a change? If the City is to receive this new “12-Month Moving Total,” what is the month to start with for calculation purposes
 - o start the 12 months from once the permit is received or
 - o backdate 12 months which were not part of the current permit or
 - o Other?
- Page 11 of 34 – 5.8.30- In regards to the City submitting an evaluation form with permit reissuance, is there a standard form that this evaluation form need to be submitted on?
- Page 5 of 21 Fact Sheet – Facility Location – The facility is located within the City of Northfield limits, however the ¼ mile north of the Dakota and Rice county borders is correct.
- Page 5 of 21 Fact Sheet – There is not a belt filter press for dewatering, there are 2 screw presses for dewatering.
- Page 8 of 21 Fact Sheet – SIU Malt-O-Meal is now Post Consumer Brands
- Page 8 of 21 Fact Sheet – Multek Flexible Circuits is now Sheldahl Flexible Technologies, Inc.
- Page 9 of 21 Fact Sheet – Table 3 of the Fact Sheet shows that the City of Northfield has no reasonable potential for contributing to a violation of copper water quality standard, therefore, the City is requesting that the copper limit be removed for our permit and replaced with a copper monitoring requirement. Please refer to the Permit Review from MESERB that is included with this response.

If you have any further questions, please contact me by phone at 507-645-3083 or by email at justin.wagner@ci.northfield.mn.us. Please respond regarding the questions/comments that are addresses above. Thank you for the review of the City's comments and questions.

Sincerely,

Justin Wagner
Utilities Manager
City of Northfield

Cc: David Bennett, Public Works Director/City Engineer, City of Northfield
Ben Martig, City Administrator, City of Northfield
Rhonda Pownell, City of Northfield's Mayor