



Assessing Salty Discharge Monitoring Data to Determine Pollution Prevention Needs and Submit a Monitoring Reduction Request

Guidance document

Background

In recent years, Minnesota Pollution Control Agency (MPCA) staff became aware of issues associated with “salty discharges” from industrial and municipal facilities. As a result, MPCA staff began to request additional monitoring for these facilities and also began assigning effluent limits to facilities that already have data which shows a reasonable potential to exceed a water quality standard. During the development of the *National Pollutant Discharge Elimination System Permitting Strategy for Salty Discharges*, the MPCA decided that it may be beneficial to permittees to utilize the two year mark as a check-in point to determine if current practices were effective in meeting water quality standards or if pollution prevention efforts are needed. The MPCA also decided that, after obtaining two years of data (or 10 data points for controlled discharges at ponds), if the monitoring does not indicate a reasonable potential to exceed a water quality standard, permittees may request a reduction in monitoring.

The intent of this guidance document is two-fold: 1) help permittees determine if pollution prevention techniques are needed to reduce the concentration of particular pollutants in the discharge; and, 2) if current practices are sufficient, clearly identify the process for submitting a request for a reduction in monitoring.

Assessing pollution prevention needs

To assist permittees in assessing their pollution prevention needs, the MPCA has developed a *Water Quality Salty Discharge Mass Balance Calculation Form* (wq-wwprm2-07). The intent of this tool is to help them understand how their effluent compares to the water quality standards for their receiving water. Specifically, the estimated concentrations generated by the spreadsheet allow permittees to see how a discharge at current concentrations might impact the river during low flow conditions. The *Water Quality Salty Discharge Mass Balance Calculation Form* (Form) is available on the MPCA webpage at <http://www.pca.state.mn.us/gp0rb25>. In order to complete the Form, you must know the 7Q10 flow for your receiving water. If you are unaware of the 7Q10 flow for your receiving water you may contact 651-296-6300 or 800-657-3864 and ask for the Effluent Limits staff for 7Q10 flow. Please note that prior to submitting a request for a reduction in monitoring of salty discharge parameters; you are required to complete a cursory review of its discharge data. The MPCA recommends that you utilize the Form; however it is acceptable to submit equivalent documentation. Please also make sure that you have completed the required amount of monitoring.

Guidance for submitting requests for a reduction in monitoring

In order to submit an official request for a reduction in monitoring, **you must submit a cover letter clearly indicating your intent along with either completed Form or equivalent documentation.** The request should be addressed to the MPCA Commissioner in care of your assigned permit writer. Once your request is received and determined complete, an effluent limits assessment will be conducted. You will then be notified by MPCA staff of whether your request has been approved or denied. If it is approved you will be required to submit application for a permit modification. All permit application forms can be found online at <http://www.pca.state.mn.us/index.php/water/water-permits-and-rules/water-permits-and-forms/water-permit-application-forms.html#permits>. Please note that a fee is required in order to complete this request.

Please be aware that if monitoring data indicate a reasonable potential to cause or contribute to an exceedance of water quality standards, you will be required to submit an application for a permit modification and a compliance schedule (if appropriate) will be added to the permit to ensure progress towards meeting the applicable standards. The compliance schedule will contain a requirement that the facility either demonstrate compliance with the standard as soon as possible or submit a variance request with the application for permit reissuance.