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December 27, 2023

Mr. David Lentz Infiltrator Water Technologies PO Box 768 Old Saybrook, CT 06475

RE: Product Renewal – Notice of Proprietary Treatment Product Listing

Description: Sewage Treatment System, Attached Growth

Manufacturer: Delta Treatment Systems, LLC, a wholly owned subsidiary of Infiltrator Water

Technologies, LLC

Product Name: ECOPOD® Series (with and without disinfection)

Model Numbers: E50-N, E60-N, E75-N, E100-N, E150-N, E200-N, E250-N, E300-N, E450-N, E500-N,

and E900-N

(Design Flow of 500, 600, 750, 1000, 1500, 2000, 2500, 3000, 4500, 5000, and

9000 GPD per unit)

Product Listing: Category A (residential sewage)

Dear Mr. Lentz:

Thank you for your application for product renewal for the Delta Treatment Systems, LLC ECOPOD Series, which includes the following models: E50-N, E60-N, E75-N, E100-N, E150-N, E200-N, E250-N, E300-N, E450-N, E500-N, and E900-N (with and without ultraviolet light disinfection).

In accordance with Minn. R. chs. 7080 through 7083, the Minnesota Pollution Control Agency (MPCA) has reviewed your submitted materials for Category A (residential) treatment product listing. Our review of the ECOPOD Series in this application (design rated capacity 500 gallons per day for Model E50-N to 9,000 gallons per day for Model E900-N) indicates it meets the requirements for proprietary treatment product registration. The ECOPOD Series is considered a Category A (designed to treat residential sewage) treatment product in the state of Minnesota that meet the following treatment levels:

- Treatment Level A (cBOD₅ of 15 mg/L, TSS of 15 mg/L, and fecal coliform of 1,000 colonies per 100 ml) with UV disinfection
- Treatment Level A2 (cBOD₅ of 15 mg/L, TSS of 15 mg/L)
- Treatment Level B (cBOD₅ of 25 mg/L, TSS of 30 mg/L, and fecal coliform of 10,000 colonies per 100 ml) with UV disinfection
- Treatment Level B2 (cBOD₅ of 25 mg/L, TSS of 30 mg/L)
- Treatment Level C (cBOD₅ of 125 mg/L, TSS of 60 mg/L and Oil & Grease of 25 mg/L)
- Total Nitrogen (TN of less than or equal to 20 mg/L)

The ECOPOD Model Series is registered with a design rated capacity of 500, 600, 750, 1000, 1500, 2000, 2500, 3000, 4500, 5000, and 9000 gallons per day per unit, as shown in Table 1 and Table 2.

Subject to this determination, the ECOPOD Model Series, including the ECOPOD E50-N, E60-N, E75-N, E100-N, E150-N, E200-N, E250-N, E300-N, E450-N, E500-N, and E900-N will be placed on the List of Registered Subsurface Sewage Treatment System (SSTS) Products. The product information listed in this Notice of Proprietary Product Listing will be maintained on the MPCA website and may not be altered or misrepresented by the manufacturer or any other person without permission by the MPCA.

Table 1. ECOPOD Model Series with Salcor 3G Ultraviolet (UV) Disinfection.

Product Name Model	Treatment Process	Design Flow (gpd)	BOD₅ Removed (lbs/day)	Highest Treatment Level	Nutrient removal*	Product Information
ECOPOD with one (1) Salcor 3G UV disinfection unit	Attached Growth	500	1.25	А	TN	 Notice of Product Listing MPCA Letter Conditions of Registration Expiration Date
Model E50-N ECOPOD with one						a FCOROD Magnet
(1) Salcor 3G UV disinfection unit	Attached Growth	600	1.50	А	TN	 ECOPOD Manual Submitted Drawings Known Limitations Installation
ECOPOD with two						Operation & Maintenance Owners Information
(2) Salcor 3G UV disinfection units	Attached Growth	750	1.87	А	TN	Owners InformationRegulators ChecklistService Contract
Model E75-N						Management Plan for
ECOPOD with two (2) Salcor 3G UV disinfection units	Attached Growth	1000	2.50	А	TN	 ECOPOD Management Plan for Salcor UV Disinfection
Model E100-N						
ECOPOD with three (3) Salcor 3G UV disinfection units Model E150-N	Attached Growth	1500	3.75	А	TN	Operating Permit Template
ECOPOD with four						
(4) Salcor 3G UV disinfection units Model E200-N	Attached Growth	2000	5.00	А	TN	
ECOPOD with five (5) Salcor 3G UV disinfection units	Attached Growth	2500	6.25	А	TN	
Model E250-N						
ECOPOD with five (5) Salcor 3G UV disinfection units Model E300-N	Attached Growth	3000	7.50	А	TN	

Product Name Model	Treatment Process	Design Flow (gpd)	BOD₅ Removed (lbs/day)	Highest Treatment Level	Nutrient removal*	Product Information
ECOPOD with eight (8) Salcor 3G UV disinfection units Model E450-N	Attached Growth	4500	11.25	А	TN	
ECOPOD with nine (9) Salcor 3G UV disinfection units Model E500-N	Attached Growth	5000	12.50	А	TN	
ECOPOD with fifteen (15) Salcor 3G UV disinfection units Model E900-N	Attached Growth	9000	22.50	А	TN	

^{*}Third-party testing showed ECOPOD effluent achieved the Total Nitrogen (TN) level of 20 mg/L [mean TN=20 mg/L with 53 percent removed]; CBOD₅ was 5 mg/L; TSS was 8 mg/L. Total nitrogen removal is highly dependent upon BOD and TKN loading, adequate alkalinity, temperature and toxicity; site specific alkalinity levels in the source water should be evaluated and homeowners should be well educated in order to achieve optimal total nitrogen reduction.

Table 2. ECOPOD Model Series with Norweco Bio-Dynamic LF chlorination using Blue Crystal disinfection tablets and Bio-Max dechlorination tablets.

Product Name Model	Treatment Process	Design Flow (gpd)	BOD₅ Removed (lbs/day)	Highest Treatment Level	Nutrient removal*	Product Information
ECOPOD with Norweco Bio- Dynamic tablet feeder, LF 1000, specified chlorine and dechlorination tablets, and minimum 60 gallon chlorine contact tank Model E50-N	Attached Growth	500	1.25	А	TN	Notice of Product Listing
ECOPOD with Norweco Bio- Dynamic tablet feeder, LF 1000, specified chlorine and dechlorination tablets, and minimum 60 gallon chlorine contact tank Model E60-N	Attached Growth	600	1.50	А	TN	 Regulators Checklist Service Contract Management Plan Operating Permit Template
ECOPOD with Norweco Bio- Dynamic tablet feeder, LF 1000, specified chlorine and dechlorination tablets, and minimum 60 gallon chlorine contact tank Model E75-N	Attached Growth	750	1.87	А	TN	

Product Name Model	Treatment Process	Design Flow (gpd)	BOD₅ Removed (lbs/day)	Highest Treatment Level	Nutrient removal*	Product Information
ECOPOD with Norweco Bio- Dynamic tablet feeder, LF 2000, specified chlorine and dechlorination tablets, and minimum 60 gallon chlorine contact tank Model E100-N	Attached Growth	1000	2.50	А	TN	
ECOPOD with Norweco Bio- Dynamic tablet feeder, LF 2000, specified chlorine and dechlorination tablets, and minimum 60 gallon chlorine contact tank Model E150-N	Attached Growth	1500	3.75	А	TN	
ECOPOD with Norweco Bio- Dynamic tablet feeder, LF 3000, specified chlorine and dechlorination tablets, and minimum 60 gallon chlorine contact tank Model E200-N	Attached Growth	2000	5.00	А	TN	

Product Name Model	Treatment Process	Design Flow (gpd)	BOD₅ Removed (lbs/day)	Highest Treatment Level	Nutrient removal*	Product Information
ECOPOD with Norweco Bio- Dynamic tablet feeder, LF 3000, specified chlorine and dechlorination tablets, and minimum 60 gallon chlorine contact tank	Attached Growth	2500	6.25	А	TN	
Model E250-N ECOPOD with Norweco Bio- Dynamic tablet feeder, LF 3000, specified chlorine and dechlorination tablets, and minimum 60 gallon chlorine contact tank Model E300-N	Attached Growth	3000	7.50	A	TN	
ECOPOD with Norweco Bio- Dynamic tablet feeder, LF 3000, specified chlorine and dechlorination tablets, and minimum 60 gallon chlorine contact tank Model E450-N	Attached Growth	4500	11.25	A	TN	

Product Name Model	Treatment Process	Design Flow (gpd)	BOD₅ Removed (lbs/day)	Highest Treatment Level	Nutrient removal*	Product Information
ECOPOD with Norweco Bio- Dynamic tablet feeder, LF 4000, specified chlorine and dechlorination tablets, and minimum 62.5 gallon chlorine contact tank Model E500-N	Attached Growth	5000	12.5	А	TN	
ECOPOD with Norweco Bio- Dynamic tablet feeder, LF 4000, specified chlorine and dechlorination tablets, and minimum 112.5 gallon chlorine contact tank Model E900-N	Attached Growth	9000	22.5	А	TN	

^{*}Third-party testing showed ECOPOD effluent achieved the Total Nitrogen (TN) level of 20 mg/L [mean TN=20 mg/L with 53 percent removed]; CBOD₅ was 5 mg/L; TSS was 8 mg/L. Total nitrogen removal is highly dependent upon BOD and TKN loading, adequate alkalinity, temperature and toxicity; site specific alkalinity levels in the source water should be evaluated and homeowners should be well educated in order to achieve optimal total nitrogen reduction.

Table 3. ECOPOD Model Series with Norweco Bio-Dynamic LF chlorination using Bio-Sanitizer disinfection tablets and Bio-Max dechlorination tablets.

Product Name Model	Treatment Process	Design Flow (gpd)	BOD₅ Removed (lbs/day)	Highest Treatment Level	Nutrient removal*	Product Information
ECOPOD with Norweco Bio- Dynamic tablet feeder, LF 1000, specified chlorine and dechlorination tablets, and minimum 60 gallon chlorine contact tank Model E50-N	Attached Growth	500	1.25	В	TN	Notice of Product Listing
ECOPOD with Norweco Bio- Dynamic tablet feeder, LF 1000, specified chlorine and dechlorination tablets, and minimum 60 gallon chlorine contact tank Model E60-N	Attached Growth	600	1.50	В	TN	operating termine template
ECOPOD with Norweco Bio- Dynamic tablet feeder, LF 1000, specified chlorine and dechlorination tablets, and minimum 60 gallon chlorine contact tank Model E75-N	Attached Growth	750	1.87	В	TN	

Product Name Model	Treatment Process	Design Flow (gpd)	BOD₅ Removed (lbs/day)	Highest Treatment Level	Nutrient removal*	Product Information
ECOPOD with Norweco Bio- Dynamic tablet feeder, LF 1000, specified chlorine and dechlorination tablets, and minimum 60 gallon chlorine contact tank Model E100-N	Attached Growth	1000	2.50	В	TN	
ECOPOD with Norweco Bio- Dynamic tablet feeder, LF 1000, specified chlorine and dechlorination tablets, and minimum 60 gallon chlorine contact tank Model E150-N	Attached Growth	1500	3.75	В	TN	
ECOPOD with Norweco Bio- Dynamic tablet feeder, LF 2000, specified chlorine and dechlorination tablets, and minimum 60 gallon chlorine contact tank Model E200-N	Attached Growth	2000	5.00	В	TN	

Product Name Model	Treatment Process	Design Flow (gpd)	BOD₅ Removed (lbs/day)	Highest Treatment Level	Nutrient removal*	Product Information
ECOPOD with Norweco Bio- Dynamic tablet feeder, LF 2000, specified chlorine and dechlorination tablets, and minimum 60 gallon chlorine contact tank Model E250-N	Attached Growth	2500	6.25	В	TN	
ECOPOD with Norweco Bio- Dynamic tablet feeder, LF 2000, specified chlorine and dechlorination tablets, and minimum 60 gallon chlorine contact tank Model E300-N	Attached Growth	3000	7.50	В	TN	
ECOPOD with Norweco Bio- Dynamic tablet feeder, LF 2000, specified chlorine and dechlorination tablets, and minimum 60 gallon chlorine contact tank Model E450-N	Attached Growth	4500	11.25	В	TN	

Product Name Model	Treatment Process	Design Flow (gpd)	BOD₅ Removed (lbs/day)	Highest Treatment Level	Nutrient removal*	Product Information
ECOPOD with Norweco Bio- Dynamic tablet feeder, LF 4000, specified chlorine and dechlorination tablets, and minimum 62.5 gallon chlorine contact tank	Attached Growth	5000	12.5	В	TN	•
Model E500-N ECOPOD with Norweco Bio- Dynamic tablet feeder, LF 4000, specified chlorine and dechlorination tablets, and minimum 112.5 gallon chlorine contact tank Model E900-N	Attached Growth	9000	22.5	В	TN	

^{*}Third-party testing showed ECOPOD effluent achieved the Total Nitrogen (TN) level of 20 mg/L [mean TN=20 mg/L with 53 percent removed]; CBOD₅ was 5 mg/L; TSS was 8 mg/L. Total nitrogen removal is highly dependent upon BOD and TKN loading, adequate alkalinity, temperature and toxicity; site specific alkalinity levels in the source water should be evaluated and homeowners should be well educated in order to achieve optimal total nitrogen reduction.

Table 4. ECOPOD Model Series without disinfection.

Product Name Model	Treatment Process	Design Flow (gpd)	BOD₅ Removed (lbs/day)	Highest Treatment Level	Nutrient removal*	Product Information
ECOPOD Model E50-N	Attached Growth	500	1.25	A2	TN	 Notice of Product Listing MPCA Letter Conditions of
ECOPOD Model E60-N	Attached Growth	600	1.50	A2	TN	Registration o Expiration Date
ECOPOD Model E75-N	Attached Growth	750	1.87	A2	TN	ECOPOD Manual Submitted Drawings Known Limitations Installation Operation & Maintenance Owners Information Regulators Checklist Service Contract Management Plan Operating Permit Template
ECOPOD Model E100-N	Attached Growth	1000	2.50	A2	TN	
ECOPOD Model E150-N	Attached Growth	1500	3.75	A2	TN	
ECOPOD Model E200-N	Attached Growth	2000	5.00	A2	TN	
ECOPOD Model E250-N	Attached Growth	2500	6.25	A2	TN	
ECOPOD Model E300-N	Attached Growth	3000	7.50	A2	TN	
ECOPOD Model E450-N	Attached Growth	4500	11.25	A2	TN	
ECOPOD Model E500-N	Attached Growth	5000	12.5	A2	TN	
ECOPOD Model E900-N	Attached Growth	9000	22.5	A2	TN	

^{*}Third-party testing showed ECOPOD effluent achieved the Total Nitrogen (TN) level of 20 mg/L [mean TN=20 mg/L with 53 percent removed]; CBOD₅ was 5 mg/L; TSS was 8 mg/L. Total nitrogen removal is highly dependent upon BOD and TKN loading, adequate alkalinity, temperature and toxicity; site specific alkalinity levels in the source water should be evaluated and homeowners should be well educated in order to achieve optimal total nitrogen reduction.

The registration of products in Minnesota is contingent upon compliance with the following conditions:

1. Products must be used in compliance with the MPCA rules and the plans and design specifications provided. Any deviation from the plans and specifications shall not be permitted unless authorized by the National Sanitation Foundation (NSF) <u>and</u>, in writing, by the MPCA for registered use.

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- 2. The manufacturer shall have readily accessible information, specific to a product's registered use in Minnesota, for designers, installers, regulators, systems owners, and service providers for the following items: a) product manual, b) design instructions, c) installation instructions, d) operation and maintenance requirements, e) homeowner instructions, and f) list of manufacturer-certified service providers, if any, as required by Minnesota Rules Chapter 7083.4040 (H).
- 3. The design flows for the registered ECOPOD Model Series are as follows:
 - 500 gallons per day for model E50-N
 - 600 gallons per day for model E60-N
 - 750 gallons per day for model E75-N
 - 1000 gallons per day for model E100-N
 - 1500 gallons per day for model E150-N
 - 2000 gallons per day for model E200-N
 - 2500 gallons per day for model E250-N
 - 3000 gallons per day for model E300-N
 - 4500 gallons per day for model E450-N
 - 5000 gallons per day for model E500-N
 - 9000 gallons per day for model E900-N
- 4. Septic/trash tank capacity for dwellings shall meet the manufacturer's minimum and maximum size requirements. All concrete, poly, fiberglass, and other registered tanks that meet Minn. R. Ch. 7080.1900 to 7080.2020 can be used for this product. The tank(s) shall be designed to withstand the pressures to which it will be subject to. The tank(s) and all pipe penetrations, risers, and other connections to the tank shall be watertight.
- 5. Each system must be delivered with an installation manual and owner's manual for the ECOPOD Model Series (E50-N, E60-N, E75-N, E100-N, E150-N, E200-N, E250-N, E300-N, E450-N, E500-N, and E900-N) and for the Salcor 3G UV disinfection unit(s). Each component must be installed in accordance with the manufacturer's installation manual.
- 6. Delta Treatment Systems, LLC, along with the Intermediate/Advanced Designer and Installer, are responsible to ensure that proper flow splitting devices are used in splitting flows to Salcor 3G UV disinfection units. Flow splitting devices must meet the following criteria: a) designed specifically and reliably to split wastewater flows; b) accessible for on-going operation and maintenance; c) monitored to determine flow rates; d) adjustable after construction should settlement occur; and e) have infinite or continuous adjustment features.
- 7. For the ECOPOD Model Series (E50-N, E60-N, E75-N, E100-N, E150-N, E200-N, E250-N, E300-N, E450-N, E500-N, and E900-N), each ECOPOD system shall be equipped with a sufficient number of Salcor 3G UV disinfection units to achieve Treatment Level A and Treatment Level B as follows: 1) E50-N will require the use of one (1) Salcor 3G UV disinfection unit; 2) E60-N will require the use of one (1) Salcor 3G UV disinfection units in parallel; 4) E100-N will require the use of two (2) Salcor 3G UV disinfection units in parallel; 5) E150-N will require the use of three (3) Salcor 3G UV disinfection units in parallel; 6) E200-N will require the use of four (4) Salcor 3G UV disinfection units in parallel; 7) E250-N will require the use of five (5) Salcor 3G UV disinfection units in parallel; 8) E300-N will require the use of five (5) Salcor 3G UV disinfection

units in parallel; 9) E450-N will require the use of eight (8) Salcor 3G UV disinfection units in parallel; 10) E500-N will require the use of nine (9) Salcor 3G UV disinfection units in parallel; and 11) E900-N will require the use of fifteen (15) Salcor 3G UV disinfection units in parallel. Flow to each Salcor 3G UV disinfection unit shall not exceed the rated capacity to ensure adequate disinfection prior to soil dispersal.

- 8. All systems shall be designed and operated with (a) suitable alarm devices(s) should either, or both, the ECOPOD Model Series or the Salcor 3G UV disinfection unit(s) malfunction.
- 9. This treatment product is a Minnesota-registered product for Type IV systems. For Treatment Levels A, A2, B, B2, C, and TN effluent loading rates to the soil, method of distribution, and vertical separation requirements shall meet the minimum requirements contained in Minnesota Rules Chapter 7080.2150 thru 7080.2350 and 7081.0250 thru 7081.0270. The effluent, following treatment in the ECOPOD Model Series, is required to be uniformly distributed to the soil for final treatment and dispersal.
- 10. Systems may only be designated as Type IV systems if designed and installed per the drawings submitted with the Application for Product Registration, initially submitted October 20, 2010 and April 1, 2015, and any other subsequent documents submitted prior to this registration.
- 11. As a Type IV system, the system must be constructed and operated under the required local permits.
- 12. The level of maintenance required for ECOPOD Model Series and Salcor 3G UV disinfection components shall be as specified in the products Operation and Maintenance Manual. This includes, but is not limited to, maintenance every six months. Both the ECOPOD Model Series and Salcor 3G UV disinfection units shall be serviced at six-month intervals. The Salcor 3G UV lamp shall be replaced at least once every two (2) years to ensure proper disinfection or more often as needed, to achieve the required fecal coliform bacteria treatment level.
- 13. For systems registered as meeting the requirements for treatment Levels A and B, testing for fecal coliform bacteria is required per the local operating permit when reduced vertical soil separation is employed.
- 14. Specific items related to chlorination and dechlorination include the following:
 - a. The Norweco Blue Crystal Residential Disinfecting Tablets (in addition to Bio-Max Dechlorination Tablets) shall be used in all systems designed to achieve Treatment Level A.
 - b. The Norweco Bio-Sanitizer Residential Disinfecting Tablets (in addition to Bio-Max Dechlorination Tablets) shall also be used in all systems designed to achieve Treatment Level B.
 - Each system must be regularly supplied with the proper chlorination and dechlorination tablets. Routine monitoring is also required to substantiate system disinfection performance.
 - d. All tablet chlorinator systems must be followed by a contact tank of the required size to meet the required treatment level.

- e. Chlorine contact tank design/geometry must be configured to assure the required residence time in the tank is achieved. Consideration must be given for proper baffling and inlet pipe configuration so that the majority of the wastewater follows a flow path that assures proper contact time for disinfection while minimizing short-circuiting.
- f. The tablet feeders shall be checked at regular service intervals, based on tablet consumption, for proper operation of the devices.
- g. The following schedule was identified by the manufacturer for refilling tablet feeders for chlorine disinfection to achieve Treatment Level A and Treatment Level B and for refilling tablet feeders to ensure adequate dechlorination prior to soil dispersal:

Treatment Level A (1,000 cfu/100mL)

Daily Flow (gpd)	Average Flow (gpm)	Tablet Feeder Model	Days Between Blue Crystal Disinfecting Tablet Refill	Days Between Bio-Max Dechlorination Tablet Refill
500	0.35	LF 1000	139	294
600	0.42	LF 1000	116	204
750	0.52	LF 1000	93	196
1000	0.69	LF 2000	140	147
1500	1.04	LF 2000	93	98
2000	1.39	LF 3000	104	147
2500	1.74	LF 3000	82	118
3000	2.08	LF 3000	69	98
4500	3.13	LF 3000	58	65
5000	3.47	LF 4000	104	117
9000	6.25	LF 4000	58	65

Treatment Level B (10,000 cfu/100mL)

Daily Flow (gpd)	Average Flow (gpm)	Tablet Feeder Model	Days Between Bio- Sanitizer Disinfecting Tablet Refill	Days Between Bio-Max Dechlorination Tablet Refill
500	0.35	LF 1000	342	294
600	0.42	LF 1000	285	245
750	0.52	LF 1000	228	196
1000	0.69	LF 1000	171	147
1500	1.04	LF 1000	114	98
2000	1.39	LF 2000	171	147
2500	1.74	LF 2000	137	118
3000	2.08	LF 2000	114	98
4500	3.13	LF 2000	76	65
5000	3.47	LF 4000	137	117
9000	6.25	LF 4000	76	65

- 15. The chlorination and dechlorination disinfection components shall be monitored at regular service intervals for the following parameters: 1) total residual chlorine shall be greater than one (1) mg/L in the chlorine contact tank and 2) total residual chlorine shall be less than 0.1 mg/L after the dechlorination component.
- 16. As specified in the Owner's Manual, limitations of the product are identified, including the backwash from water softeners and other unsuitable wastes, must not be discharged into the system. The manufacturer is responsible to provide a listing of other known limitations, made available on the company's website or other means.
- 17. Training shall be provided to MPCA-licensed Subsurface Sewage Treatment System practitioners before designing, installing, or providing service to the ECOPOD Series Models E50-N, E60-N, E75-N, E100-N, E150-N, E200-N, E250-N, E300-N, E450-N, E500-N, and E900-N treatment systems and to Salcor 3G UV disinfection devices registered for use in Minnesota.
- 18. During the period of product registration and as part of the renewal process, systems using registered treatment products are subject to an audit by the MPCA.

Please be advised that this registration expires December 31, 2025. Manufacturers desiring to continue product registration beyond this date must obtain MPCA renewal according to the requirements in Minn. R. Chs. 7083.4040 (E). If the product has changed or is retested according to the protocol required for registration, renewal shall be based on the most recent test results. If the MPCA finds the product has changed in any way that may affect performance, it may not be renewed and must meet the requirements for initial registration.

The MPCA is in no way endorsing these products or any advertising, and is not responsible for any situation which may result from its use or misuse. The MPCA is not liable for any product failure and these statements are not intended and cannot be relied upon to establish any substantive or procedural rights with the state of Minnesota or the MPCA, either express or implied, that can be enforced in litigation or any administrative proceeding.

If you have any questions, please contact Wendy Chirpich at 507-344-5248 or by email at wendy.chirpich@state.mn.us.

Sincerely,

Wendy Chirpich
This document has been electronically signed.

Wendy Chirpich

Environmental Specialist

Municipal Division

cc: File