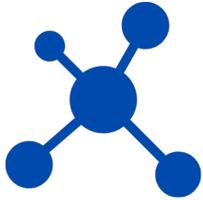




# CGMC Environmental Program Emerging Issues & Continued Advocacy

## Legislative Issues



### Per- and Polyfluoroalkyl Substances (PFAS)

PFAS are a class of pervasive chemicals that have been linked to various health concerns and have been found in a variety of waterbodies across the state. PFAS can be removed from drinking water through expensive treatment, but there is no technologically feasible method for removing them from wastewater.

**CGMC's Role:** We plan to focus on source reduction strategies at the Legislature and with the Minnesota Pollution Control Agency (MPCA), as well as defend against any proposals that seek to place liability on cities for the presence of PFAS in wastewater or drinking water.

### Chloride

More than 100 cities may be facing chloride limits in their wastewater permits, but there is no feasible method to remove chloride at a wastewater facility. Most cities will need a variance from these permit requirements, and a variance will still require efforts by the city to reduce chloride. Some cities may be required to install central water softening, but others may be able to address the issue by working with citizens to remove and/or upgrade home water softening equipment.

**CGMC's Role:** We are pushing for legislative funding for grants to assist cities with the removal or upgrade of home water softeners. We will also continue to monitor this issue, submit comments, and take other steps to support chloride variances.



### Reestablishment of Wastewater and Water Operator Advisory Council

The Wastewater and Water Operator Advisory Council provided operators from our cities an opportunity to help shape the requirements and regulations governing their operations, but the statutory authority for this council lapsed. MPCA sought to reestablish this council during the 2020 legislative session, but the legislation stalled.

**CGMC's Role:** We supported this legislation and will continue to do so.

### Microplastics

Tiny bits of plastic, known as microplastic, are appearing in waters across the globe. By themselves, plastics may cause harm to humans and animals, but this concern is compounded because PFAS and other contaminants may accumulate on microplastics. Federal regulators and state legislators are looking at ways to mitigate this risk.

**CGMC's Role:** We are monitoring this issue to ensure that sole responsibility for addressing microplastics is not placed on municipal wastewater facilities



### Funding for Innovative Approaches and Climate Impact

As the cost of wastewater treatment increases, cities are looking to alternative approaches to address water quality issues and the impacts of the changing climate. Current state funding may not always support innovative projects because they do not fit into traditional program definitions.

**CGMC's Role:** CGMC is exploring how current funding programs can be improved and/or how new programs might be created to support innovative water quality approaches.



# CGMC Environmental Program Emerging Issues & Continued Advocacy

## Legal & Regulatory Issues



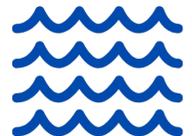
### Integrating Wastewater Permitting in Watershed Framework

At the directive of the Legislature, state and local agencies have been moving toward a water quality framework based on watersheds, but to date permitting for wastewater facilities had not been well integrated into that approach.

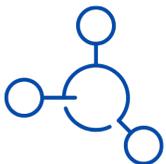
**CGMC's Role:** We are working with MPCA to explore better and more cost-effective ways to integrate wastewater permitting into the watershed framework. This work will include an informational webinar for municipal wastewater operators and examining whether further legislation is needed to assist in this integration.

### Lake Pepin TMDL

Nearly two-thirds of Minnesota's watersheds drain into Lake Pepin and are therefore subject to the Lake Pepin Total Maximum Daily Load (TMDL) plan. This plan seeks to impose phosphorus limits on cities' wastewater and stormwater even though data shows the lake is no longer impaired.



**CGMC's Role:** We joined with other local government advocacy organizations to bring a contested case action on the TMDL. We hope to negotiate a solution with the MPCA on this issue.



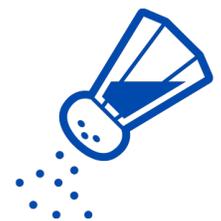
### Nitrogen and Nitrate Standards (EPA Nutrient Criteria)

The federal Environmental Protection Agency is developing nutrient criteria for lakes that will regulate nitrogen and nitrate. These standards could have major negative economic impacts for municipal wastewater facilities.

**CGMC's Role:** CGMC is participating in the federal rulemaking process and will monitor state developments.

### Class 3 & 4 Waters/Salty Parameters

Multiple CGMC members have unnecessary permit limits based on MPCA's outdated Class 3 and 4 water quality standards, which have caused major impediments to economic development (i.e. Luverne and TruShrimp). In addition to the cities that currently have problematic permit limits, more than 20 CGMC members are slated to receive outdated permit limits unless MPCA updates the underlying water quality standards.



**CGMC's Role:** We are engaging with MPCA to push for revised Class 3 and 4 water quality limits and for the revision of permits with outdated limits.

### Proposed Permit Fee Increase



MPCA is seeking to impose a fee increase on water quality related permits to generate more funding for its water quality operations. A significant portion of this increase will fall on municipalities.

**CGMC's Role:** We continue to push for increased general fund spending for water quality operations, rather than requiring local municipalities to pay for these increases.