

Categorical Permitting in Minnesota



Categorical Universe

The MPCA uses delegated authority to issue Pretreatment Permit. These permits are referred to as State Disposal System (SDS) permits.

- Individual Permits
 - Currently 9 Individual permits
- General Permits
 - The MPCA has one general permit, which is specifically for 40 CFR 433 Metal Finishing facilities.
 - Currently 44 facilities are covered

Individual Permits

This is a small group of facilities. All of the individual permits are issued for a five year term.

- Aluminum Forming 467 (1)
- Central Waste Treatment 437 (2)
- Metal Finishing 433 (2)
 - These facilities can only monitor at a combine discharge location
- Metal Molding & Casting 464 (1)
- Pharmaceutical Manufacturing 439 (3)

General Permit

This permit is specific to facilities that are subject to 40 CFR 433 Metal Finishing standards and them must be able to monitor process flow directly. This permit was last issued in 2017 for a ten year permit term.

Two options:

- TTO Management Plan & Certification or non-use
- Monitoring for TTOs
 - Currently all 44 Certify non-use of TTOs



Oversight and Management

- Currently 1.25 FTE dedicated to the Pretreatment Program
 - Soon to be 1.0 FTE due to reorganization
- 53 Permitted categorical facilities
- ALTERNATIVE Inspection Plan!
 - Currently inspecting a third of these annually
 - No MPCA conducted sampling
 - Most are sampled by the POTWs

Permitting Challenges

- Locating facilities that need to be permitted.
 - POTWs are required to notify per their NDPES requirements
 - MPCA Inspections specifically ask about existing & new industrial users
 - Some fall through the cracks



