



June 21, 2022

Anne Wilkinson
Stantec Consulting Services Inc.
7500 Olson Memorial Highway Suite 300
Golden Valley, MN 55427

RE: Treatment of Blue Lake with Alum

The purpose of this letter is to confirm that the Minnesota Pollution Control Agency (MPCA) has reviewed the request from Stantec Consulting Services Inc. and Isanti Soil and Water Conservation District (ISWCD) to apply alum directly to Blue Lake. This approval is limited to activities in the fall of 2022 and a second follow-up application (likely in 2024) to reach an aerial aluminum dose of 113 g Al/m². If more additions are needed beyond this dosing rate, please contact MPCA for further approval. Stantec Consulting Services Inc. or ISWCD should alert local Minnesota Department of Natural Resources (DNR) staff and citizens in advance of the planned treatments to avoid confusion during the application.

MPCA requires that pH will be monitored during application to insure that the lake pH does not drop below 6.0. MPCA would like to receive any reports that the conservation district or consultant/applicator generate as they continue their regular water quality monitoring efforts for surface waters impacted by this treatment. Also, please consider submittal of data to MPCA's EQUIS database. This will allow MPCA staff and others to follow-up on the effectiveness of the treatment in subsequent years. For forms and information, see the webpage at: <http://www.pca.state.mn.us/index.php/water/water-monitoring-and-reporting/surface-water-data/surface-water-data-submittal-review-and-reports.html#data-submittal>.

In the past, DNR issued permits authorizing alum treatments of lakes with concurrence from MPCA. Currently, MPCA reviews alum treatments. This letter is being provided in lieu of a permit, although permits are required for lakes with continuous alum treatments or inlet treatments of stormwater. The Municipal Separate Storm Sewer System (MS4) permit regulates the use of alum and ferric chloride in stormwater contained within the conveyances and structural stormwater BMPs of the MS4 but does not cover receiving waters.

MPCA staff work together with local partners to address external load reductions via current or planned projects. Many times, the long-term goals for the water body cannot be met with the use of in-lake treatment chemicals alone. External load reductions, including, but not limited to, wastewater reductions, improving agricultural practices, reducing urban runoff, and restoring vegetative buffers, are also necessary. Without external reductions, the long-term effectiveness of in-lake treatments can be reduced. The MPCA is aware Stantec Consulting Services Inc. and ISWCD are considering all source of phosphorus to Blue Lake.

If you have additional questions, please feel free to contact me at dennis.wasley@state.mn.us or at 651-757-2676.

Sincerely,
Dennis Wasley
Environmental Analysis and Outcomes Division
Minnesota Pollution Control Agency

C: Joe Stewig, DNR Sauk Rapids Area Fisheries Supervisor