

May 6, 2022

To: Conference Committee

SF 4062 - Omnibus environment, natural resources, and tourism bill

Dear Conferees:

The Minnesota Municipal Utilities Association (MMUA) has been working with the Coalition of Greater Minnesota Cities (CGMC), the League of Minnesota Cities (LMC), and the Minnesota Pollution Control Agency (MPCA) on PFAS related issues. Along with CGMC and LMC, MMUA serves on the advisory group created by 2021 legislation to help the MPCA develop and implement an initiative to reduce sources of PFAS and supports the agency's desire to do some PFAS monitoring at municipal wastewater facilities.

Importantly, MMUA believes such testing needs to be conducted in a uniform manner so the results are useful in trying to develop strategies for dealing with PFAS. As wastewater treatment plants are only conduits and not primary sources for the creation of PFAS and since such testing benefits Minnesota as an entire state, we believe such testing should not be an unfunded mandate on the utilities or underlying cities operating these treatment facilities.

To that end, we respectfully request that you include the House language on page R4 in lines 4.5 through 4.14 and amend it to specify that \$600,000 of the \$2 million in agency funding for PFAS related efforts are designated to cover the cost of the proposed wastewater monitoring.

The language could read, for instance: "(i) \$2,000,000 the second year is to support efforts to prevent per- and poly-fluoroalkyl substances (PFAS) contamination. Of this amount, \$1,025,000 is for grants to support projects designated to prevent PFAS releases to the environment, identify sources of PFAS, and implement reduction strategies, and \$600,000 is for a coordinated wastewater sampling, testing, and monitoring program for PFAS as outlined in the Wastewater Program Plan section of the agency's PFAS Monitoring Plan dated March 2022. This is a onetime appropriation and is available until June 30, 2025."

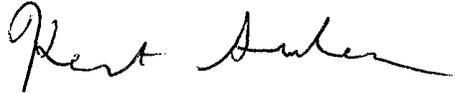
Currently the language provides that \$1.4 million be spent on grants related to assorted PFAS efforts, and the PFAS monitoring being recommended could qualify for the grant money. The problem, however, is that proceeding on a grant-by-grant basis does not

ensure that thorough and uniform monitoring will occur. The MPCA has provided MMUA with data showing that \$600,000 should be sufficient for the agency to contract for complete and uniform testing. The agency has also stated that they need \$375,000 for a 1.5 FTE and administrative costs, leaving \$1.025 million for grants to support PFAS contamination prevention. MMUA has discussed this amendment with CGMC and LMC, and they have stated their support for inclusion of the language as proposed above.

We hope you agree that this proposed amendment represents good public policy regarding PFAS and wastewater testing, and will incorporate it, along with the House language it amends, into your final conference report.

Thank you for considering this request.

Sincerely,



Kent Sulem

Director of Government Relations and Senior Counsel