

Current MN Statute (1988 NSMP)

SANITARY SYSTEMS

2016 Proposed Change

WASTEWATER TREATMENT SYSTEMS

Preface

Current MN Statute (1988 NSMP)

The following section on sanitary systems was developed by the Technical Advisory Committee of the North Shore Management Board. It describes the Minnesota Pollution Control Agency's (MPCA) Chapter 7080, Individual Sewage Treatment System Standards, and recommends uniform adoption and enforcement of the code by all local governmental units with the North Shore planning area.

Additional regulations are outlined for Erosion Hazard Areas and Planned Unit Developments.

The North Shore Management Board believes that the adoption and strict enforcement of the MPCA's Chapter 7080 code is critical to improving existing water quality problems which have resulted from inadequate sanitary systems along the North Shore.

2016 Proposed Change

NONE

2025 Proposed Change (update to MN Statute)

Do either of the 1988 or 2016 standards fulfill your needs? What changes would you propose to the 1988 standard (currently in MN Statute)?

Introduction

Current MN Statute (1988 NSMP)

There are many issues relating to sanitary systems and water supply along the North Shore, however most are beyond the scope of this version of the Shoreland Management Plan. The sanitary systems component of this plan will focus on wastewater treatment and regulations regarding treatment systems. Guidelines for ground and surface water appropriation, well development and abandonment, hazardous waste disposal, water conservation practices, and other concerns may be addressed later.

Presently most of the rural households along the North Shore rely on septic systems to treat sewage. Residents in the cities of Grand Marais, Beaver Bay, Knife River, Taconite Harbor, Silver Bay, and Two Harbors have access to centralized wastewater treatment

facilities, while many smaller communities and developments such as Grand Portage, Terrace Point and Bluefin Bay use packaged treatment plants. Centralized or collector systems, as well as individual, onsite septic systems need proper siting, frequent inspection, and regular maintenance to ensure adequate wastewater treatment.

There are public health as well as environmental and aesthetic concerns associated with wastewater treatment along the North Shore. The risk of contaminating water supplies, of contracting contagious or non-contagious diseases, and of degrading surface water resources are probable outcomes of inadequate sewage treatment. Surface or ground water supplies may be contaminated with bacteria from human waste or with toxics from improper hazardous waste disposal. This can result in the transmission of such contagious water-borne diseases as cholera, typhoid, and giardiasis and possibly increase the risk of cancer, miscarriage, and genetic defects. Coastal areas of Lake Superior, North Shore rivers, and inland lakes may experience algal blooms, increased growth of aquatic weeds and unpleasant odors from the addition of increased nutrients or sewage from improperly treated wastewater. These adverse health, environmental, and aesthetic concerns reduce the appeal of the North Shore region.

Water resources of the North Shore are especially susceptible to contamination. Very thin surficial deposits with high clay content overlying impermeable, crystalline bedrock, offer less than optimum conditions for siting septic systems and increase the need for adequate setbacks and regular maintenance and pumping. Rapid runoff and a fractured bedrock aquifer system provide easy opportunity for contamination of ground and surface waters. For these reasons, it is important to consider setback and construction requirements, the permitting process, maintenance, and abandonment for individual onsite units, municipal and industrial systems, and collector package plants. These concerns and the problem of non-conforming systems are addressed in the following section.

2016 Proposed Change

The 1988 North Shore Management Plan recognized that sanitary systems were an important issue but did not offer substantial policy guidance for dealing with the issue. The original plan contained the following statement: “There are many issues relating to sanitary systems and water supply along the North Shore, however, most are beyond the scope of this version of the Shoreland Management Plan.” Following that statement was a summary of existing systems and treatment options coupled with technical information about state regulations pertaining to sanitary systems.

It has been argued that the lack of a cohesive policy by the NSMB toward wastewater planning has been one of primary missed opportunities for the NSMB. The NSMB update will change this by charting a policy course that would allow the NSMB to provide shorewide leadership in facilitating discussion and action on wastewater treatment issues. The NSMB is stating that these issues are not outside the scope of the NSMP. The NSMB, as an existing Joint Powers Board, will serve as a mechanism for the North Shore to speak to these issues in a unified voice.

There has been a realization nationwide that decisions made regarding wastewater infrastructure can have consequences for land use. Planning for sewage treatment systems cannot be done without considering the effects that new systems may have on future growth of an area.

In Section 2.4, the discussion will focus major concepts in wastewater treatment, changes in the statewide regulatory framework, and the status of existing wastewater treatment systems on the North Shore.

2025 Proposed Change (update to MN Statute)

Do either of the 1988 or 2016 standards fulfill your needs? What changes would you propose to the 1988 standard (currently in MN Statute)?

Current MN Statute (1988 NSMP)

Wastewater Treatment Categories

Rationale for Subgroup Delineation

There are many types of wastewater sources along the North Shore of Lake Superior. Communities, industries, resorts, businesses, and private homes all generate wastewater in various volumes. Wastewater from each type of source also has a variety of chemical, biological, and physical characteristics. The methods used to treat each source of wastewater as well as regulations and responsible unit of government may vary according to volume and type.

Sources of wastewater have been placed into two broad categories - individual and municipal/industrial. A third category, package wastewater treatment plants, describes a specific set of technologies which is gaining wider usage on the North Shore. Packaged plants may serve most types of wastewater sources.

Individual Onsite Wastewater Treatment Systems

An individual onsite system may treat wastewater from residences and small businesses, as well as small clusters of homes and businesses.

The Minnesota Pollution Control Agency's Chapter 7080, Individual Sewage Treatment System Standards, provides the basic regulatory framework. Chapter 7080 specifies that individual onsite systems can treat up to 15,000 gallons per day of effluent from a single establishment. Collector systems which route wastewater to an individual on-site system can serve up to 15 dwellings and establishments, or have a capacity of 5,000 gallons per day, whichever is less.

The three counties along the North Shore have enacted wastewater treatment ordinances that contain the same basic provisions and follow MPCA's Chapter 7080. Each county has delegated authority to administer their respective ordinances, issue permits, and inspect installations. Chapter 7080 contains state regulations for individual onsite wastewater treatment systems.

Owners of individual onsite systems are charged with the responsibility to operate the system within design parameters and to maintain the system properly. An important component of maintenance is the inspection of septic tanks and the removal of the accumulated sludge and scum. As a rule of thumb, septic tanks should be pumped out at a frequency of once every three years if the system is designed and operated properly. Owners of individual onsite systems should not use septic tanks additives. Additives are of questionable benefit, may actually cause irreparable damage to the system and may cause pollution problems. Septic system maintenance may be the weakest link in onsite wastewater treatment technology and this problem should be addressed more fully in the future.

Because of costs, lot size, topography, lot owner preference, and other factors, a pit privy can be constructed and used, according to provisions of Chapter 7080 and county ordinances. Pit privies can only be used for the treatment and disposal of human body wastes without pumping or other water carrying means.

Should soil conditions or topography be severely limiting so as to rule out the construction of an individual onsite wastewater treatment system, a holding tank may then be installed. It must be emphasized that holding tanks are permitted only as a last resort when other wastewater treatment options are not available.

All septage (septic tank contents) that is removed from septic tanks or holding tanks must be disposed of according to MPCA guidelines and county ordinances or policy. Proper disposal includes spreading of the effluent on a suitable permeable soil that is flat, above the water table, and not saturated with septage from previous loads.

All individual onsite wastewater treatment systems, must adhere to Chapter 7080 and county ordinances, and will be required to be installed a minimum distance away from Lake Superior and the streams flowing into Lake Superior. Septic tank and soil absorption systems must be setback at least 50 feet from the vegetation line, except in Erosion Hazard Areas where greater setbacks may apply. For the purpose of this plan, the vegetation line shall be defined as the first clearly identified line of terrestrial vegetation above the ordinary high water mark. There must also be a separation distance between a septic system and any nearby wells. Chapter 7080 states that the minimum separation distance be 50 feet, unless the well has a casing less than 50 feet in depth and which does not penetrate at least 10 feet of impervious material, in which case the separation distance must be 100 feet. In most cases along the North Shore, the 100-foot separation distance will be necessary. These are minimum standards, and counties may adopt more restrictive setbacks (see Diagram 3. Minimum Spacing Requirements --Sewage Treatment Systems).

Municipal and Industrial Sewage Treatment Systems

Municipal and industrial sewage treatment systems are generally much larger than individual on-site treatment systems and normally utilize surface discharge as final disposal. A municipal sewage treatment system is one that collects liquid waste generated by individual dwelling units and businesses of a city, town, or village via a system of sewers and is treated at one central facility. This also includes individual sources of greater than 15,000 gallons per day, collector systems serving 15 or more sources, or volumes of greater than 5000 gallons per day, and all sewage treatment systems utilizing other than soil absorption or holding tanks. Industrial systems treat only those liquid wastes generated through and/or as a byproduct of an industrial process and does not include the wastes generated by the human labor force located at a particular plant.

Municipal and industrial sewage treatment systems may range from a few hundred gallons per day to thousands of gallons per day for a small collector system, to millions of gallons per day for large cities or industries.

Municipal and industrial sewage treatment systems consist of, but are not limited to, one or more of the following processes: sedimentation, coagulation, filtration, chemical precipitation, pre and/or post chlorination and dilution. Bacteria reduction of solids is important but may not be necessary during treatment of some industrial wastes.

Jurisdiction over the various sewage treatment systems is determined by the size, type, or location of the system. The disposal of septage is usually permitted by the county, while sludge from municipal treatment plants is governed by the MPCA Sewage Sludge Management Regulation 7040.010-7040.4700.

Package Plants

Residential developments used by transient, intermittent and/or permanent populations that are too small for construction and operation of conventional wastewater treatment plants (WWTP) frequently utilize WWTP's known as package systems. These package plants usually comprise several standardized modules which are installed and connected together at the site to serve user populations of 20 to a few hundred persons and are privately owned and operated. Package WWTP's are issued operating permits by the MPCA, permits typically contain discharge limitations on biochemical oxygen demand, total suspended solids, pH and phosphorous.

Fluctuations in wastewater volumes, organic content and volumes, as well as temperature, create difficulties in attaining permit discharge limits by pack-age plants. These plants, by virtue of the waste loads they are to treat, require careful design which addresses the special sewage system characteristics associated with their use. In order to help the package plant attain the discharge limits of its permit, it is vital that the plant be operated by personnel with special training in all aspects of package plant design, operation, maintenance and environmentally compatible management of plant waste sludge.

Nonconforming Systems

For the purpose of this discussion, non-conforming systems will consist of:

1. Systems which have an obvious surface discharge, or where the effects of a discharge are detected, or
2. Systems in failure, but not detectable by conventional means.

Upgrading systems to comply with current standards should be initiated through one of the following: at time of sale; in response to complaints or as a result of various detection techniques, including the use of tracers, aerial detection; on-site visits; record searching; or a program of compulsory replacement of systems not built to current codes.

Methods for the replacement of non-conforming systems might include: Voluntary owner replacement of the system; filing a compliance order; collective upgrading through sewage management districts or collector systems. Replacement might also be encouraged through the use of various financial incentives such as low interest loans, tax adjustment, and matching or direct grants.

The issue of non-conforming sewage systems can be addressed by better public education. This education effort could be coordinated through the North Shore Management Board with the University of Minnesota Extension Service. The use of these resources should assist in the development of various programs directed at residents and visitors to the North Shore. Specific education programs should be particularly directed toward youth.

Permitting Process

All newly constructed occupancies along the North Shore that generate wastewater must have properly permitted wastewater disposal systems that adhere to standards in Chapter 7080 and the ordinance in the county.

The process diagram on the previous page details a recommended permitting option for wastewater treatment facilities (see Diagram 4. Recommended Permitting Options for Wastewater Treatment Facilities). By working through the diagram, a potential applicant can determine if the MPCA or a county will be the permitting authority. The MPCA is responsible for larger facilities that require a National Pollutant Discharge Elimination System Permit or State Disposal Permit, while counties will have jurisdiction over the smaller wastewater treatment systems.

By going through the local unit of government for the appropriate wastewater system permit, local control can be maintained. This would also allow each county to have one set of standards and permitting process rather than one for the Lake Superior Shoreline and

one for the inland areas. An annual report of permits granted by each county should be prepared and presented to the North Shore Management Board for their review and to document development. Each county, by adhering to Chapter 7080, will maintain a backbone of regulations that would provide a measure of consistency, while enabling counties to continue existing programs and to react to local needs and conditions. Permits will generally only be issued for wastewater treatment options that incorporate proven technology. Demonstration or research projects may be permitted, but would require special consideration and supervision. The MPCA has the responsibility to permit, monitor, and inspect larger wastewater treatment systems as well as those utilizing water bodies or the ground surface to receive discharges of treated effluent. Local units of government should be kept informed of problems associated with these facilities and should be given the opportunity to accompany MPCA personnel during inspections. Local units of government have an interest in these facilities and can offer additional assistance.

Closure/ Abandonment

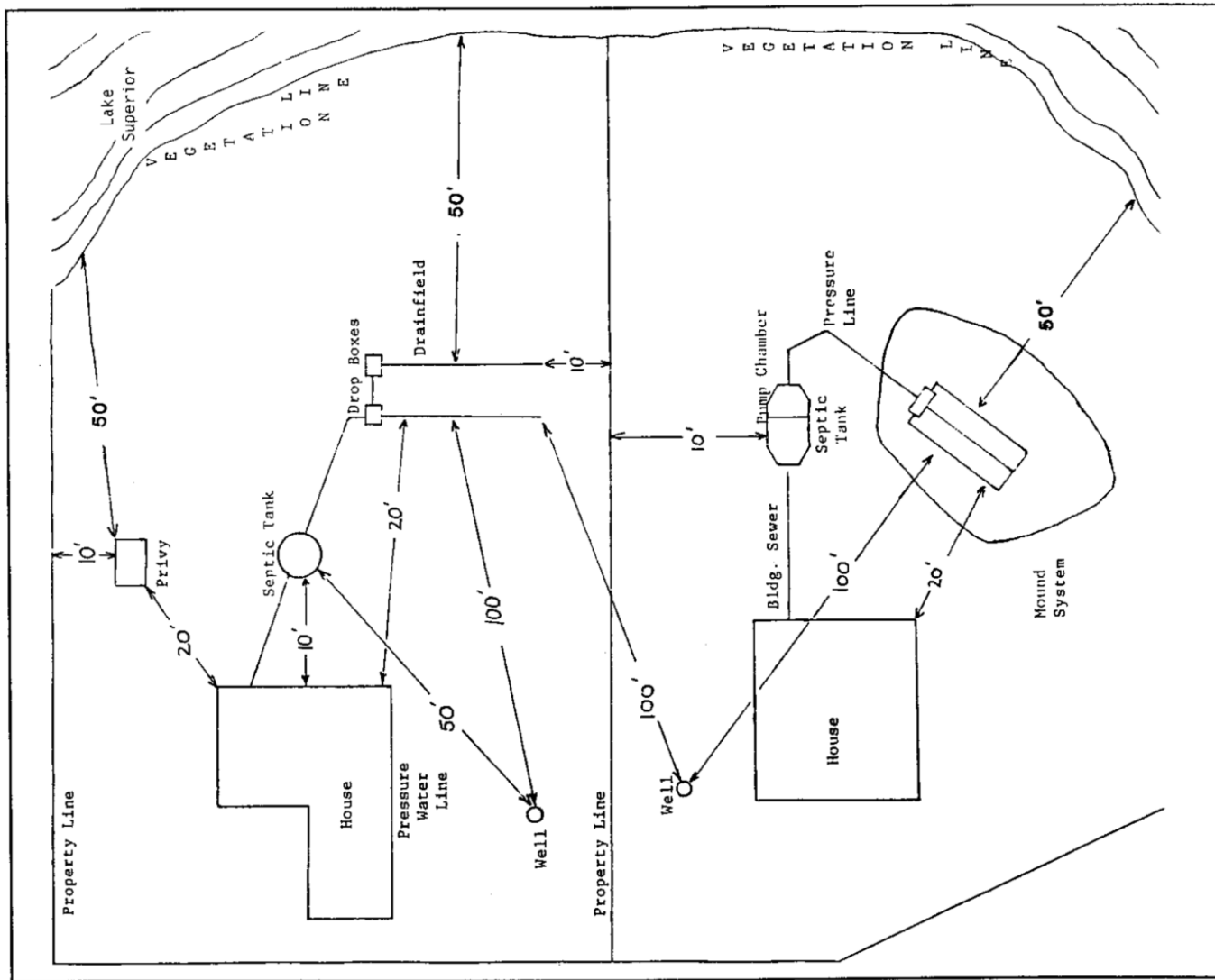
When wastewater systems are to be abandoned a plan to prevent contamination of public waters should be submitted to the local responsible unit of government for approval. The abandonment process should be closely monitored to ensure compliance with the approved plan.

Other Areas of Concern

The importance of proper wastewater treatment is integrally tied to the quality of our drinking water supply. Ultimately, any discussion of sanitary systems is directed toward the protection of domestic water supplies. Thus, this plan must also acknowledge the significant issues of surface and ground water appropriations, well development and abandonment, and the disposal of hazardous wastes as they relate to issues of human health and safety. Direct discharges into Lake Superior are permitted, but only after demonstrating that other options are not feasible. A future work element of the North Shore Management Board should be to identify an appropriate discharge threshold level for Lake Superior for consideration and adoption. It should be noted that the MPCA has jurisdiction and permitting authority for direct discharges to Lake Superior. That agency should be contacted regarding specific rules, regulations and procedures to be followed in such instances.

Contamination of our water supply from sources such as landfill seepage or runoff, atmospheric deposition of mercury or toxic hydrocarbons, pesticides, leaking underground storage tanks, septic system additives and others are of concern, but are beyond the scope of the current North Shore Management Plan. These issues should be addressed through existing codes, such as the Minnesota Well Code or Minnesota Department of Health and MPCA regulations, and through educational efforts directed at North Shore residents and visitors. Additional research should be directed at some of the topics and future revisions of the North Shore Management Plan should consider them more fully and offer guidelines for zoning, permitting and regulation.

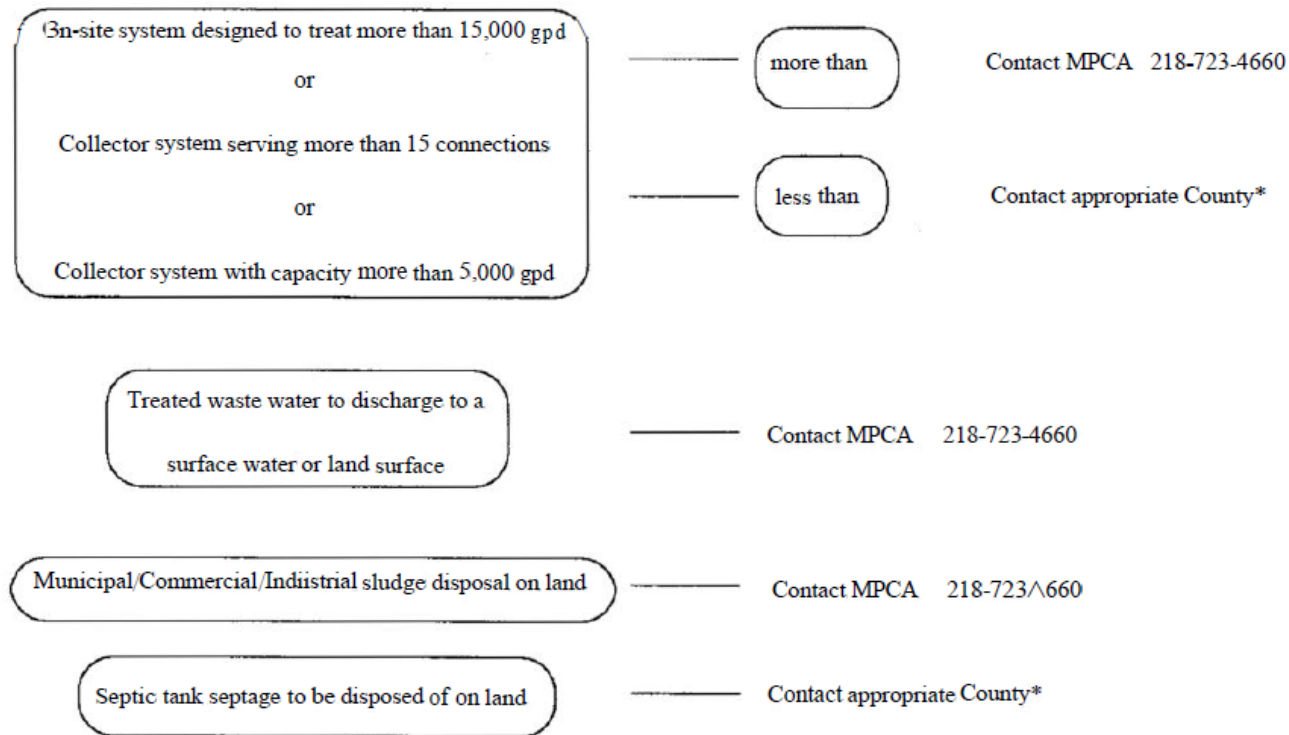
Diagram SS-1. Minimum spacing requirements – sewage treatment systems



From Minnesota Pollution Control Agency's – Chapter 7080, Individual Sewage Treatment System.

(Note: The NSMB prefers septic tank and soil absorption systems be placed as far as possible from the shoreline and ideally, with a greater setback than the house/structure.)

Diagram SS-2. Recommended Permitting Options for Wastewater Treatment Facilities



*County telephone numbers: Cook County: 218-387-2282
 Lake County: 218-834-5581
 St. Louis County: 218-727-8661

2016 Proposed Change

W1. Major Concepts/Issues in Wastewater Treatment

1) Centralized Systems vs. Decentralized Systems and the question of Growth Management

Centralized systems are considered to be a system where wastewater is collected from individual dwelling units or businesses and sent to a central facility where it is treated. According to the U.S. Environmental Protection Agency, a decentralized system is characterized

by the absence of central wastewater collection and treatment. Decentralized systems include conventional onsite systems, cluster systems (a group of homes and businesses served by one decentralized system), and alternative wastewater treatment technologies. Please see the Appendix for more information on these systems.

By their nature, centralized systems can allow higher density growth due to the simple fact that centralized treatment eliminates the need for treatment facilities on individual lots. In the case of the North Shore, areas of substandard soil conditions can make siting of on-site systems quite difficult. Larger tracts of land may be required in order for a single property owner to find adequate space for an on-site system.

Therefore, future density becomes a key issue when an area relatively rural in nature builds a connection to an existing centralized system to solve, for example, a situation where septic systems are failing and causing environmental degradation. The connection may alleviate the septic issue but now a situation has been created where there is potential for substantially higher density in the areas served by new connection.

In addition, advances in on-site system technology are making it possible for some on-site systems to be located on smaller lots. In the past, the land needed for adequate on-site systems could be used as a method of controlling density. These new technologies have the potential for significantly reducing the role that on-site systems requirements have in controlling density.

These issues make land use planning even more important. The link between wastewater treatment and land use planning should be made early on in any planning process, long before any construction of new systems takes place. On the North Shore, an example of proactive planning took place prior to construction of the North Shore Sanitary District connection to the Western Lake Superior Sanitary District system. The North Shore Land Use Plan, completed in late 2001, was required by the State prior to funding due to concerns about management of growth after construction. Through the planning process, a number of jurisdictions along the new sewer line elected to keep their density at previously established levels. Castle Danger is another example where land use planning was part of the wastewater management planning process.

1) Managed On-Site Systems

The EPA and MPCA are supportive of this model to address areas where failing septic systems and/or environmental conditions are a problem and where a connection to a centralized system is not feasible due to cost, growth concerns, etc. The EPA has provided national guidelines that consist of five model programs that could be used to achieve better management of on-site systems. This continuum of management begins with a program to inventory systems and increase awareness of wastewater issues. The final model programs on the continuum call for a responsible management entity to be created to operate and maintain a system or to manage and own the system. In this scenario, the homeowner pays a monthly fee for maintenance of their on-site system. The maintenance could be done by a public entity or by a private contractor selected by a public entity.

A great deal of work has already gone into studying this topic. In April 2002, a report was published for the Iron Range Resources and Rehabilitation Agency and the Northern Minnesota Consortium of Counties entitled Model Code Framework for Performance Management of Onsite/Cluster Systems. This report (produced by NRRI, Ayres Associates, and St. Louis County) summarizes the EPA guidelines and provides a framework to follow in order to facilitate the development of any of the five models.

2) Performance Code for On-Site Systems

In addition to the framework provided in the report mentioned above, the report also contains a model performance code for on-site systems. In addition, there are other groups in the state who are trying to create as detailed a performance code as possible for use by local staff. The idea behind a performance code is the belief that the existing Chapter 7080 standards that regulate onsite systems in

Minnesota are too prescriptive. There is not enough flexibility provided in the standards to allow for the unique site conditions faced in northeastern Minnesota. At this date, no local units of government in the North Shore Management Planning Area have officially adopted a performance code.

W2. Changes in the Existing Statewide Regulatory Framework

Since the adoption of the NSMP in 1988, there have been a number of key changes or proposed changes in the state regulatory framework for on-site systems, which is referred to as Chapter 7080.

In addition, the state is encouraging the use of new cooperative approaches to decentralized wastewater treatment while also proposing significant changes in the scoring system than ranks wastewater projects seeking loans from the State.

CHANGES TO CHAPTER 7080

Chapter 7080 has been revised twice since 1988 to reflect changes to Minnesota state statutes. The highlights of the changes are the following:

- On-site systems designed to treat more than 10,000 gallons per day per development and discharging to sub-surface needs permitting by the PCA.
- Any system utilizing surface disposal needs permitting by the PCA.
- Collector system language in Plan is obsolete—omit.
- County setbacks should be equal to or greater than state requirements.

WATER QUALITY COOPERATIVE AREA-WIDE State Disposal System (SDS) PERMITS

This concept, introduced during the 1997 session of the Legislature, established guiding principles for the establishment of area-wide permits for alternative discharging systems. The goal was to give communities another option to consider when deciding on wastewater system options and management. Two pilot projects are underway where area-wide permits have been issued by the MPCA: the Upper Mississippi River basin and the Rainy River basin.

In order to facilitate development of a system of managed on-sites, a water quality cooperative is created. State statute describes this as “an association of person organized under Minnesota Statute Chapter 308A to install own, manage, and control individual sewage treatment systems (ISTS) or alternative discharging sewage systems (ADSS) and provide water-quality treatment and management services within a defined geographic area” (from Minn. Stat 115.58).

PROPOSED CHANGES TO PROJECT PRIORITY RANKING SYSTEM

The MPCA currently has the charge of scoring and ranking proposed wastewater construction projects for loans through the State Revolving Fund (SRF). The result of this ranking is the Project Priority List (PPL). Over the past few years, increasing demand for loans has necessitated a funding cutoff, or minimum number of points for a project to eligible for funding. In the future, however, it is likely the cutoff will need to be raised in order to ensure that high-priority projects are funded. With this in mind, the point system must be reviewed to ensure it accurately represents the state’s priorities.

One of the issues with the current point system is that it does not consider the age or condition of a system. This may not give enough priority to preserving existing municipal wastewater assets.

The current system also does not consider whether a community needs to expand due to growth or upgrade due to the need to meet tougher effluent limits. Finally, there is concern about projects in unsewered areas extending beyond what is necessary to correct environmental or public health.

With this in mind, recommendations for the 2004 legislative session will include a revision of principles for ranking the PPL. Projects that address significant health hazards will remain a high priority. In addition, municipalities with stressed existing systems should have access to funds. Finally, projects in unsewered areas should be consistent in scope with the environmental issue being addressed. Following this principle, a corrective action alternative selection hierarchy will be established for projects proposed in an unsewered area due to failing individual on-site treatment systems (ISTS). This hierarchy requires the following to be considered prior to any consideration of connection to an existing centralized system:

- 1) Replacement of failed ISTS with new ISTS with centralized management
 - 2) Decentralized wastewater systems that combine local failed ISTS into a multi-household system with centralized management.
- (Water Pollution Control Revolving Fund Improvements, MPCA, February 2003)

It seems clear from reading this that projects with limited hookups proposed to connect to a centralized system will be at a competitive disadvantage under the new system. In essence, the state is saying that the “big pipe” solution will be the last one considered for unsewered areas.

W3. Status of Existing Wastewater Systems

Since the adoption of the NSMP in 1988, a number of construction and planning projects have taken place. There has been development of a number of small sanitary districts along the North Shore that are in various stages of progress toward connection to a centralized or decentralized system.

The following is a summary of the status of key issues regarding MPCA permitted or proposed public facilities on the North Shore:

- Duluth/North Shore Sanitary District:
 - Phase 1-(Lester River to Lake County line) – currently constructing a sewer line with collection to the Western Lake Superior Sanitary District (WLSSD)
 - Phase 2-This phase will take the existing Knife River sewer plant off-line and connect its customers to the new sewer line being constructed in Phase I. This project has received partial funding through a grant and is on the project priority list.
- Knife River/Larsmont Sanitary District – The project has been placed on the project priority list. The unsewered area from Knife River to the western limits of Two Harbors would be sewered with collection to WLSSD through the Duluth/NSSD line that is currently under construction.
- Two Harbors Wastewater Treatment Facility – The City has been notified by the MPCA that they must address the infiltration and inflow problems with the system. The city is discussing the construction of holding ponds to address the issue. The City of Duluth is dealing with a similar issue.
- Silver Creek Township:
 - Castle Danger Phase 1-Currently in operation
 - Castle Danger Phase 2- (Castle Danger Church to Lafayette Bluff)-Project is in the planning stages
- Stewart River- (Two Harbors City limits to Silver Creek Cliff) Project is on the Project Priority List. The proposal would call for collection to an existing system.

- Beaver Bay Wastewater Treatment Facility – An expansion of the system is planned with the addition of new ponds.
- Tofte and Schroeder Sanitary District– Proposal for collection system is on the Project Priority List. A number of issues have placed progress on hold.
- Grand Marais Wastewater Treatment Facility-Work will take place this summer to alleviate infiltration and inflow problems with the system

W4. Policy Considerations for the NSMB

There are a number of policies the NSMB could consider for the future. All of these options will require a collaboration with local officials, wastewater experts, and citizens who have already put a great deal of time and effort into North Shore wastewater issues. These policy options allow the NSMB to passively support or to actively lead in addressing wastewater issues. To some degree, some of these things (more specifically the performance code ideas) are already underway. The NSMB will avoid duplication of effort and work with existing information whenever possible. The priorities among these options are underlined and in bold. The NSMB will take action to support these priorities.

- 1) Take no active role in North Shore wastewater issues. This is the current situation.
- 2) Encourage all local comprehensive plans to contain sections detailing the linkage between wastewater planning and land use planning. Plans should indicate areas for future expansion of centralized systems.
- 3) Support an inventory of on-site system and the building of awareness of maintenance needs for on-site systems. A task force, along with a study, could determine if higher management levels are necessary. If higher management levels are needed, the options beginning with #6 become more realistic:
- 4) Encourage the adoption of a performance code for on-site systems by individual counties.
- 5) Work with local officials and others with expertise in on-site systems to review existing model codes and create a detailed model performance code for the North Shore Management Planning Area.
- 6) Encourage the issuance of an Area-wide permit for the Lake Superior Basin.
- 7) Play a leadership role in gaining support and sponsor the issuance of an area-wide permit for the Lake Superior Basin.
- 8) Encourage the idea of managed on-site systems along the North Shore.
- 9) With or without the issuance of an area-wide permit, assist in the creation and/or become the water quality cooperative for the North Shore.
- 10) Support the creation of a responsible management entity to operate and maintain a network of managed on-site systems.
- 11) Become the responsible management entity to operate and maintain a network of managed on-site systems.
- 12) Support the creation of a responsible management entity to own and maintain a network of managed on-site systems.
- 13) Become the responsible management entity to own and maintain a network of managed on-site systems.

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