



Shell Rock River Watershed District
305 S 1st Ave
Albert Lea, MN 56007
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www.ShellRock.org

April 18, 2025

Jim Sullivan
Minnesota Department of Commerce

Re: Midwater Energy Storage Project; Docket No. ESS-24-294

The Shell Rock River Watershed District is a local government unit that has established rules and is guided by State approved, comprehensive water management plans. Among our many objectives, improving water quality and reducing degradation are key goals. The District is aware of the Energy Storage Project and would like to reference the District Rules dated February 13, 2007, as follows:

Water quality treatment is required for sites that are in NPDES Phase II rules:

a. Maintenance of Storm Water Facilities – All storm water facilities shall be maintained in proper condition consistent with the performance standards for which they were originally designed. All settled materials from ponds, sumps, grit chambers, and other devices, including settled solids, shall be removed and properly disposed of when the dead pool volume falls below design volume. No storm water facilities may be approved unless a maintenance plan is provided that defines who will conduct the maintenance, the type of maintenance and the maintenance intervals.

b. Design Criteria - Water quality ponding design criteria shall be based upon the manual "Protecting Water Quality in Urban Areas (MPCA 2000 or as revised)." Treatment requirements can be met by showing removal of total suspended solids specified by MPCA rules and by limiting discharge to 5.66 cubic feet per second (cfs) per acre of treatment for a 1.25-inch event, or by providing NURP treatment volume.

When looking at these rules, we ask that you use the more restrictive 5.66 cfs design criteria, as the BESS site is located directly next to the Shell Rock River. Additionally, please install skimmers to further treat water before it is discharged.

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Heschel", is written over a light blue horizontal line.

Andy Heschel,
District Administrator