

# CITY OF WARROAD

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**Council –**  
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February 28, 2020

International Joint Commission  
U.S. Section  
1717 H Street Northwest, Suite 835  
Washington, DC 20006

**RE: Preliminary assessment of potential cost impact for the City of Warroad.**

Dear Commissioners:

I am Daniel Trosen, the Utility Superintendent for the City of Warroad (“City”). The City owns and operates a wastewater treatment plant that is regulated pursuant to a National Pollutant Discharge Elimination (NPDES) and discharges to the Red River of the North. The proposed nutrient concentration objective and load targets, if enforced by the Minnesota Pollution Control Agency (“MPCA”) or U.S. EPA, could require the City to make costly investments in process changes and/or infrastructure upgrades at our wastewater treatment plant (“WWTP”).

Cities like Warroad are on the forefront of protecting the Red River of the North and we take water quality concerns about the Red River and downstream Lake Winnipeg very seriously. Over the last several years, the City has made significant efforts to reduce our phosphorus contribution to the Red River. We are also currently participating in the stakeholder process facilitated by the Basin Commission to work with other cities, agricultural groups and the state to develop strategies to protect water quality in the Red River. We support the IRRB’s effort to develop a phosphorus load target designed to protect Lake Winnipeg and we urge the IJC to focus its effort on building consensus around the appropriate phosphorus load target for the Red River.

The potential financial costs of complying with the proposed phosphorus and nitrogen concentration objectives for the City and similarly situated communities are stark. The City currently owns and operates a pond wastewater treatment facility. We requested a preliminary analysis from our engineering consultant about what it would cost for our facility to meet the proposed phosphorus and nitrogen concentration objectives. Given the uncertainty related to how the concentration objective would apply to our specific facility, we assumed that our facility would be required to comply with both a total phosphorus limit of 1 milligram per liter (“mg/L”) and total nitrogen permit limit ranging between 15 mg/l to 10 mg/L.

Based on a preliminary evaluation, the cost to comply with both a total phosphorus limit of 1 milligram per liter (“mg/L”) could be as high as \$80,000 a year. The cost to comply of a TN limit ranging between 15 mg/L to 10 mg/L could be as high as \$1,000,000. This is a potentially significant cost for a relatively small load reduction to the system and it would be in addition to the cost for the City to meet its other infrastructure priorities important to protecting public health and the environment. For TN we would have to do mechanical pretreatment. The upfront costs could be as high as 1.5 million and the yearly operating is largely unknown.

Given the significant concerns identified by Minnesota cities and municipal groups and the potential economic consequences for municipal WWTPs, we believe that it is unreasonable for the IJC to accept the IRRB’s proposed concentration objectives for phosphorus and nitrogen and the load target for nitrogen at this time. Instead, we urge the IJC and IRRB to focus its efforts on the development of a phosphorus load target for the Red River designed to protect Lake Winnipeg, and to work with all stakeholders to develop a strategy to meet that target.

Thank you for your time and consideration.

Sincerely,  
Daniel Trosen

City of Warroad  
Utility Superintendent