Bill Wright

I request the agency to hold a contested case hearing, for reasons specified below. If this request is denied, my follow up request is for the agency to hold a public informational meeting to provide transparency on their decision and address the concerns of residents prior to issuance of the permit.

I have two primary reasons for requesting a hearing: (i) testimony of experts who specialize in these systems, and (ii) already dangerous levels of nitrates existing in our groundwater supply.

(i) Testimony of Experts

At the May Township Planning Commission meeting held in May 2024, a parent whose children attend Liberty Classical Academy initially spoke in favor of the proposed wastewater treatment facility, suggesting these were common around the state. He stated he was an expert in this area, as he owned a company that specializes in these types of systems. He also sits on the Grant Planning Commission. Given his expertise, he opened the floor for any questions from those in attendance about the system. When asked if Grant would allow the infrastructure to support this system (the pump house, generators, etc.) he said he didn't know for sure, but probably not. However, when asked directly if he would want one of these systems near his own home, he very candidly said no he would not.

The man's name is Matthew Fritze, and the company he owns is called Great Northern Environmental, LLC. I would request Mr. Fritze as a witness in the hearing so that he can better explain his point of view and why he stated that he wouldn't want this type of system near his own home. I found him to be helpful and genuinely informative, and I think having him explain and clarify his perspective would be helpful. I would also request witnesses who were at the meeting who can provide their perspective and detail on that discussion, including members of the May Township Planning Commission, if necessary, and other town residents. I entered that meeting not really even thinking about the wastewater treatment facility risks, as there were other concerns on my mind relative to the proposed development, but left the meeting extremely concerned about the proposed system, given the data and expert opinions shared.

This system is obviously out of my own expertise, but it is in Mr. Fritze's. As a concerned resident, I would want greater awareness and information as to just why this type of system is not OK to put near someone else's home, but it is OK to put near mine.

(ii) Dangerous Levels of Nitrates

In their in "Infiltration Evaluation Report" dated March 22, 2024, Terracon indicated that their Nitrate testing came back at only 1.2 ppm. I may be reading that wrong, and there may be other testing that was done with other results, but if that is accurate this is completely at odds with the test results that local residents have experienced in their own groundwater testing. Our own well water tested at 5.63 ppm when we initially installed it. Other neighbors have tested at even higher levels. While EPA guidelines have a maximum of 10 ppm, the MPCA may be aware that more recent studies and research indicate that the EPA guidelines may be outdated and that a limit far below that number creates an material and elevated risk.

The National Cancer Institute, for example, found in a study from 2018 that nitrates above 5 ppm create an elevated risk of several kinds of cancer, including kidney, bladder, colon and even ovarian. Meaning, the water my family already drinks is already within that danger zone. The addition of this treatment facility, and what seems to be little design for neutralizing the nitrogen discharge, will only serve to take the water of local residents - all of whom rely on their wells - and put it further into that danger zone and elevate our risks.

I worked at 3M for a significant period of time. I also lived in Lake Elmo before moving to this area. I am aware of households who, despite having wells, are completely dependant on drinking bottled water because of what has been done to their groundwater. Agencies stood by the practices that created those situations, and said they were safe - until they weren't. A major reason those of us living in this agricultural area chose to live here were density constraints that serve to minimalize the type of environmental impact and risk this system potentially introduces. I hope the facts can be discussed in an open and public way in a contested case hearing. If rejected, then please hold a public meeting and address the concerns of local residents so that we can better understand the anticipated impact of this system, inherent risks, and worst case scenario situations and mitigation strategies.