

Suzanne Kelly

To whom it may concern,

My first comment is, I was somewhat dismayed, as I read through the draft of the permit. It appears that the PCA would like us to comment on the operation and maintenance of a wastewater treatment facility, as 18 of the 25 pages of the draft are focused solely on meeting the PCA's requirements. I doubt highly, that the general public has experience in operating a wastewater treatment facility, nor could make comments on it.

I am concerned about the flow of 25,625 gallons/day and our ground water. I've been told this isn't a concern. With ground penetration, soil types, flow rates, our ground water will not be affected. No worries. If this business operates 20 days/month, 9 months per year, that equates to 4,612,500 gallons/year.

I read through the PCA LSTS design guide, which is directed towards developers that are expanding housing developments on the edge of suburban/rural, let's call it "lines". It appears, much of the criteria that the PCA applies to a LSTS is being applied to the Liberty Classical Academy Wastewater Treatment facility. That is not the case here. This is a rural community, not on an edge to a suburb. All households are on acreage and have wells. There is a 9 mile radius from the location of the proposed wastewater treatment facility where all households within that radius have wells. I understand the PCA does not concern itself on the location of the proposed wastewater treatment facility.

In the Town of May, where the wastewater treatment facility has been proposed, for a building/structure located in Hugo, MN, the minimum acreage required to build a home is 10 acres. So for example, an 70 acre parcel of land, could accommodate 7 homes. Based on the PCA's flow rate determinations (see attached), a three bedroom home would have a flow rate of 450 gallons/day, 365 days/year which equates to 164,250 gallons/per household. Seven households equates to 1,149,750 gallons/year versus Liberty at 4,612,500 gallons/year.

Yes, I'm concerned. And so are another 500+ people who signed a petition against the Liberty Classical Academy Wastewater Treatment facility which was presented to the May Town Board. Will the PCA guarantee, with it's operational and maintenance requirements, that we, within a 9 mile radius of the Liberty Classical Academy Wastewater Treatment facility, will have no adverse effects to our drinking water and wells?

I have one more comment. When I looked at page 6 of the permit draft, 4. Summary of stations and station locations, the PLS location is T31N, R21W, S36, NE Quarter of the SE Quarter. From what I can ascertain, is this parcel in Hugo, MN?

Thank you for your time.

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Appendix C

Flow determination for Individual Dwellings Worksheet

The following table provides the flow for individual dwellings

Table I. Design flow dwellings (gallons per day)

# of bedrooms	Classification of Dwelling			
	I	II	III	IV
2 or less	300	225	180	*
3	450	300	218	*
4	600	375	256	*
5	750	450	294	*
6	900	525	332	*

Notes for Table I

Flows for Classification IV dwellings are 60 percent of the values as determined for Classification I, II, or III systems. For more than six bedrooms, the design flow is determined by the following formulas:

Classification I Classification I dwellings are those with more than 800 square feet per bedroom, when the dwelling's total finished floor area is divided by the number of bedrooms, or where more than two of the following water-use appliances are installed or anticipated; clothes washing machine, dishwasher, water conditioning unit, bathtub greater than 40 gallons, garbage disposal, or self-cleaning humidifier in furnace. The design flow for Classification I dwellings is determined by multiplying 150 gallons by the number of bedrooms.

Classification II Classification II dwellings are those with 500 to 800 square feet per bedroom, when the dwelling's total finished floor area is divided by the number of bedrooms, and where no more than two of the water-use appliances listed in Classification I are installed or anticipated. The design flow for Classification II dwellings is determined by adding one to the number of bedrooms and multiplying this result by 75 gallons.

Classification III Classification III dwellings are those with less than 500 square feet per bedroom, when the dwelling's total finished floor area is divided by the number of bedrooms, and where no more than two of the water-use appliances listed in Classification I are installed or anticipated. The design flow for Classification III dwellings is determined by adding one to the number of bedrooms, multiplying this result by 38 gallons, then adding 66 gallons.

Classification IV Classification IV dwellings are dwellings designed under Minn. R. 7080.2240.

Other notes

Each family unit in a multi-family residence is considered one (1) dwelling. For example, a duplex would be considered two (2) dwellings. One (1) bedroom units must be considered as two-bedroom units (already incorporated into the Table I).