

Jim Dropps

Hello MPCA, I am writing with strong concerns about the long term impact of this sewage system in our rural area that already has impaired drinking water due to high nitrate levels. I live about 2000' from the site, my last test of the nitrate level in our groundwater was in 2019, with a reading of 7.5mg/l.

I talked to an engineer on the system RE nitrates. He said the system does have a nitrate reduction system, but only down to 10/mg per liter of water. So it will remove nitrate down to 10mg/l, which is the recommended safe drinking water level by EPA. But if it's flowing 10,375 gallons initially, that's still adding 392,730mg/nitrate per day, 143,346,450mg per year. In pounds that's 316lbs of nitrate per year going into our drinking water.

When it goes to the full 25,625 gallons a day, that's 970,010 mg/nitrate per day, or 2.13lbs per day. That's 777lbs of nitrate per year we are consistently adding to our drinking water.

The question I would like answered is at what rate will this 777lbs of nitrate going in per year increase the nitrate levels in the drinking water. With a reading already nearing the safe drinking level limit, and perhaps already there, how can this possibly proceed until this question is answered?

I have recently been made aware that the subject land is already listed as 'Vulnerable' under the MN Department of Agriculture's 2019 Groundwater Protection Rule. So the land is already subject to nitrate application restrictions, (which I believe are Level 2 restrictions due to the groundwater already being over 8mg/l (again I have not tested in 6 years, but I'd bet it's over 8mg/l right now).

So we already have statutory restrictions on nitrate applications in the area, yet we're signing up to intentionally and consistently add 777lbs per year? I would like to know how these two facts can possibly align - It would seem that if this project indeed violates the MN Ground Water Protection Rule, it would be an opportunity for legal challenge, and at minimum, necessitates a full Environmental Impact Study to answer these questions and avoid future legal issues.

If there were ever a situation that necessitated a full environmental review, it seems this is that exact situation, as we have –

1. Groundwater already in a contaminated state(The EPA describes water with readings over 3mg/l as artificially contaminated)
2. The system falls within a protected/vulnerable area under MN's Groundwater Protection Rule that limits nitrogen inputs.
3. A uniquely large system...I understand there are other organizations that use large wastewater plants, but 21 Mounds, 25,000 gallons, 900+ humans? Something this size would seem to necessitate complete and thorough environmental study, but the need becomes overwhelming considering the already impaired waters.

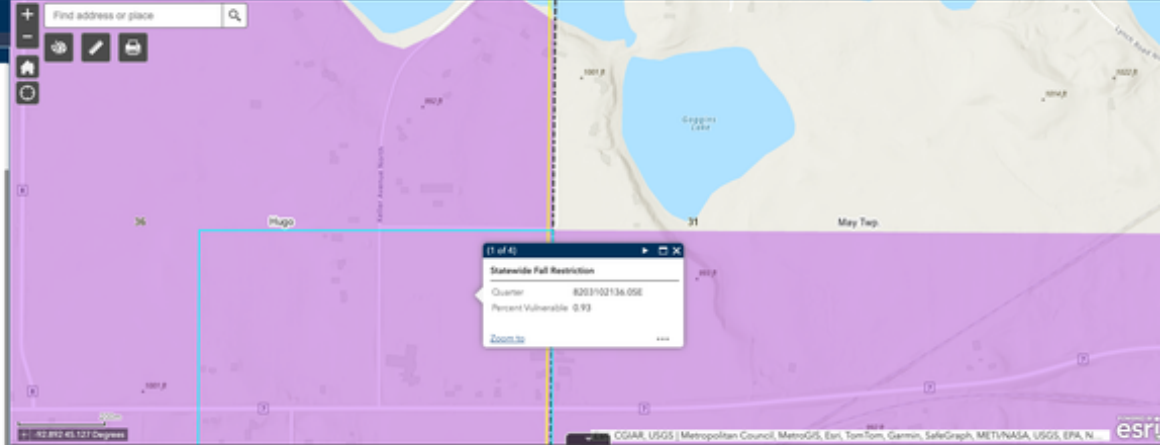
4. Widespread neighbor opposition/concern.

5. Numerous unanswered questions with regard to current nitrate levels and the rate at which they will rise.

Thank you for your work on this project.

Legend

- PLS Townships and Sections
- Cities, Townships, and Unorganized Territories
- Counties
- Public Land Survey Sections
- Exempt Counties
- Exempt Counties with $+3N$ Ag
- Climate Exemption
- Restrictions by DWSMA (2025)
- DWSMA Low Vulnerability Exemption (2025)
- Drinking Water Supply Management Areas (DWSMA) with Nitrate-N at 5.4 mg/L (2025)
- Drinking Water Supply Management Areas (DWSMA) with Nitrate-N at 5.4 mg/L (2025)
- Restriction by Quarter Section or Government Lot
- VulnerableQuarterSections



VulnerableQuarterSections

Options Filter by map extent Zoom to Clear selection Refresh

Quarter	Percent Vulnerable
8201102136.05E	0.93

1 Features 0 selected

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LABORATORY ANALYSIS REPORT 758-19

Wednesday, July 31, 2019

MDH CERTIFIED LABORATORY 027-003-130 EPA LAB CODE MN 00076

Attn: Jim Dropps

Date Collected: 7/29/2019

9783 122nd St. N

Date Received: 7/29/2019

Hugo, MN

Collected By: Client

Parameter/Method	Sample ID	Results	Units	MDL	Reporting Limit	Analysis Date
Nitrate SM 4500-NO3 E-00	Kitchen Faucet (758-19-01)	7.50	mg/L	0.0025	0.030	7/31/2019

MDL = Method detection level Temp Blank >4.0 degrees C

Sample was collected on 7/29/19 at 12:00, received by IRI on 7/29/19 at 15:22 and analyzed on 7/29/19 at 11:30 for nitrate. Sample DOES meet MDH and EPA guidelines for safe drinking water for analytes tested. The results are only indicative for the sample tested from the sample point on the date collected.

All analyses were performed using Minnesota Department of Health approved methodologies.

Report submitted by,

SUZANNE MELCHIOR, LABORATORY MANAGER

SM/kg

The results in this report apply only to the samples analyzed in accordance with the chain of custody document. This report must be reproduced in its entirety.