

North Zumbro Sanitary Sewer District (NZSSD)

I am commenting on the issue of biosolids in the new wastewater treatment facility.

I am very concerned for my own local facility in Monticello, Mn that has been putting biosolids on ag fields (the very same field) for years upon years west of the city. I've seen it applied for many unknown years. I believe it would be a good test site for long term studies.

I have concerns for what has already been applied. I firmly believe the sludge should be dewatered and hauled to qualified landfills. I somewhat understand the economics is for ag fields, but again the long term effects have not been adequately studied.

Coming from an ag background, it has always concerned me that ag land today has greatly deteriorated because of the excessive use of herbicides, pesticides, and fertilizers. These alone have destroyed the bacterium biology in the 10feet of topsoil, which has more effect on purifying our groundwater, than does sediment/soil filtration. This with potentially putting in more toxins will have long term effects that we are not measuring adequately.

I am a retired Mechanical Engineering PE, and a retired CQE and I understand that considerable parts per million of the toxic chemicals may still be released to our fields, but it does not seem right that certain limits are allowed to go in the same field year after year.

Unknowns should be addressed.

Monticello is also headed in the direction of a new WWTP, of course being subsidized by large corporations rushing to build hyperscale Data Centers. It concerns me that we do not know the full extent (type and volume) of the chemicals that WILL be dumped into these treatment plants. Not good. As a CQE I am demanding a full file of Safety Data Sheets planned in our community.

I know that as of September 2025 that those biosolids going on to ag land must now be tested for PFAS. I know that the applications must meet rules for contaminants, pathogen reduction, vector attraction reduction, site restrictions, crop restrictions, recordkeeping, and reporting. Knowing all this, it still concerns me that toxic biosolids are still being applied to our soil which is "nonrenewable". It concerns me that it took until 2025 to finally limit PFAS.

Cities are poor at controlling what gets dumped into their toilets or laundry tubs. We all know there are body shops, mechanic garages, industries, that spill/pour chemicals that end up as sludge. Households dump unused drugs, cleaners, prescription medications, bug killer, spray fertilizer, unused herbicides, these end up as sludge. We all know they should not, but they do.

So, I will quote EPA:

But even for biosolids, land application is not automatically best. EPA's 2025 draft PFAS risk assessment found potential human-health risks from PFOA or PFOS exposure in some modeled biosolids land-application scenarios, including scenarios with biosolids containing 1 ppb PFOA or PFOS.

This leads to EPA's own Decision Rule - of land application or dewatering. My personal AI inquiry (Perplexity Pro) made it clear to me, here is what the report said:

For an unknown or mixed water treatment plant sludge, dewater it and send it to a permitted, lined disposal facility rather than burying it into agricultural land. Land application should be reserved for tested, permitted, beneficial-use residual with clear agronomic value and low contaminant risk.

How can you decide ahead of time that the type and volume of chemicals dumped by a Data Center into a WWTF will meet the EPA criteria? (I strongly believe the WWTF should plan for dewatering.)

As a CQE, I personally want to see the complete file of (SDS) from the Data Center. I am especially concerned about the chemicals in the cooling systems.

I surprises me that the restrictions for acceptance of dewatered sludge at a landfill appears to be much tighter that what goes into the ground. If the landfill refuses it, I want to know what you do with it. Do you then incinerate it at much higher cost? Data Centers must not pass costs onto residents.

My mind is pretty well made up that this sludge should be landfilled.

I want to see the new WWTF equipped to economically handle the sludge, which brings up an even greater question: How much toxic waste passes the WWTF into our streams? This makes me strongly question the wisdom of a mega hyperscale data center.

We need more questions answered, we need more testing. I also want storm water testing.

I've done my own research and these data center corporations do not have a good track record of following the laws. We as Minnesotan must stand together.

Sincerely,

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