

One of the important components necessary to building a new wastewater facility is knowing what's going to be connecting to it, how to assess potential risks and mitigate those risks. A key detail was left out: Pine Island's data center Project Skyway. This is a worrisome missing detail given the city is facing a lawsuit by the Minnesota Center for Environmental Advocacy over the inadequacy of the environmental review of the "Project Skyway." See court case file 25-CV-25-2298.

On p.28 of the AUAR the required prompt of the environmental review towards the top of the page is "Wastewater - For each of the following, describe the source, quantities, and composition of all sanitary, municipal/domestic and industrial wastewater produced or treated at the site." Towards the bottom of the page, highlighted you'll see "Industrial process wastewater is not anticipated." That's all the analysis given. On p.29 they only list the standard process that the wastewater treatment facility *uses*. There is no mention of any chemicals produced by Project Skyway, how they would be disposed of or whether the wwtf could dispose of them, what harms could be caused by any chemicals or how any potential harms could be mitigated, which is the entire purpose of this section of the environment review.

On p.27 of the AUAR it says "both scenario A and B would utilize an air-cooling system...therefore additional groundwater impacts are not anticipated." The Preliminary Development Plan (PUD) specifically mentions (in addition to other sources) "no water usage will be used for data center cooling." Now comes the January 13th, 2026 zoning meeting. In the notes of this meeting that was not live streamed the city administrator, Elizabeth Howard says a "closed loop air cooled system consists of tubes that are filled with water,"---that right there is water that is being used for cooling purposes, which is a direct contradiction to the PUD's claims of no water for cooling purposes. You still need to disclose how much *groundwater* is going into those tubes and your environmental review should have included that water usage into its totals for groundwater impact analysis. If there's a leak in those tubes that's the type of harmful situation you're supposed to mention on p.28 of the AUAR and provide a mitigation strategy for it. Craig Britton, city engineer then says the chemical disposal of this closed loop system would be "flushed into holding tanks and disposed of offsite, the city may be able to take some waste into the local system. Britton stated that the Environmental Impact Analysis was completed in September of 2025." Now we have the city stating that in this undisclosed amount of water there is an undisclosed amount of undisclosed chemicals, but when you look up what chemicals are typically in closed loop systems (glycol, PFAS, corrosion inhibitors, fire suppression agents, HFOs, HFCs, biocides) municipal water treatment facilities can't remove those chemicals. But apparently Pine Island may be going to take some of that waste into their system, which discharges into the Zumbro River. MPCA's own staff have confirmed in phone calls with me that this is industrial wastewater. This wastewater is planned to be produced *and* potentially treated without having undergone any environmental review not only at Pine Island's existing wwtf if the data center is built before this new site is, but then they would just move on over to this new wwtf doing the same thing they did in Pine Island site. It is also unacceptable to just simply state that this effluent discharge of unknown quantity is going into holding tanks and being disposed of offsite. To where? How big are these tanks? What if they leak? What's in them? If what's inside of those holding tanks is so hazardous you have to dispose of it off site what is your

hazardous waste mitigation plan and why did you never once mention that during environmental review? The environmental review the city engineer is referencing as supposedly addressing this is the very same AUAR where they stated there wouldn't be any industrial wastewater.

Per the lawsuit (indexes 4, 12, 56, 65, 70) there is also evidence that the project's water usage is 2-3x higher than what was reported in the AUAR, which will also have a significant impact in being able to accurately assess wastewater treatment facility design and impacts. Data centers have to clearly state what they are using for their cooling systems and have very well defined plans in place in order to have effective wastewater management. The chemicals used in their cooling systems impact the physical structure, the pipes and the cooling systems they use impact the electrical wiring needed etc. It also has significant impacts on the environment. You will need to know the Water Usage Effectiveness and the Power Usage Effectiveness (<https://www.eesi.org/articles/view/data-centers-and-water-consumption>) and climate has an impact on whether air cooling will actually work as well. Given all of MPCA's information in the EAW highlight MN's climate is warming, air cooling is least effective in warmer climates, there also needs to be very clearly defined guidelines as to the limits of what types of cooling systems this new wwtf would even support for data centers as far as capacity for intake, ability to remove chemicals and payment for equipment upgrades if the data center lies. (<https://ecologixsystems.com/articles/data-center-water-treatment-systems-in-theory-and-in-practice>) Pine Island is making this a violation of the NPDES permit waiting to happen.