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From: Judith Lang/ Lynton Land

Sent: Feb 26, 2010 9:29 AM

To: Frank Fletcher

Cc: Bill McConahey , Brian Barnes , Charles Costello , Dick Saxer , Greg Haugan , Kenny Eades , Lee Allain , "Michael S. Harwood" , Ralph Millar , Stan Cichowitz , Tommy Tomlin , "W. H. Shirley" , William Pennell

Subject: Re: Bluff Point water supply plan FAQs

For perspective, 0.2 MGD (Million Gallons per Day) is roughly the same as Warsaw and Kilmarnock, so it seems quite excessive. They could always pipe the brine out into the Bay rather than inject it, and I agree with Frank that they would never get a permit (if sanity prevailed) for injection.

I'm worried about their waste disposal plan. My concerns are based solely on the presentation and I have not looked at the documents they submitted. As I wrote to the County:

3) Plans for wastewater disposal were not clear in the presentation. The idea of using wastewater for irrigation has problems that were not addressed. First, wastewater is produced 24/7, so some sort of storage must exist. Irrigation requires that the water be moved, involving expenses and sufficient planning as to be able to dispose of it even in times of heavy rain. Local farmers do not use the artesian aquifer for irrigation because it is so salty, and more than a few inches of irrigation causes salt build-up in the soil and damages the crops. Additionally, the water is alkaline and unlike our acidic rain and shallow groundwater. The practicalities of water disposal by irrigation were not adequately addressed and there was no mention of disposal of the solids (sewage sludge). Sludge is the least efficient of all fertilizers, so disposing of it by land application would exacerbate the pollution of the Bay and local waterways already caused by agricultural fertilization, responsible for about 85% of local nitrogen pollution.

More worrisome is who would bear the cost for upgrading the facility if EPA should "raise the bar" and lower the discharge limits for nitrogen/phosphorus. The cost of installing "Enhanced Nutrient Removal" or "Best Practicable Control Technology" can be extremely expensive for small facilities, especially in the case of Phosphorus. Achieving "Limit of Technology" nutrient removal is prohibitively expensive. The sad fact that the agricultural lobby has so far been successful in minimizing restrictions on fertilization practices means that EPA and DEQ view wastewater plant upgrades, even though they are extremely expensive, as politically more expedient because the costs are spread around and the agricultural "gorilla" is not enraged. Stricter discharge limits from wastewater treatment facilities are likely in the future and costs will be incurred. Who will pay for them?

Everything they have proposed will be flooded by a Category 4 storm, and all the southernmost construction will be flooded in a CAT1 event. As long as the County bears no responsibility for this certainty, I suppose it's like building on a floodplain and then complaining because your house got flooded. DUH!!!

Lynton