

MPCA

Docket = 80-90030-34519

I am strongly opposed to the MPCA proposal to eliminate Minnesota's existing 10 parts per million limit on sulfate pollution and replace it with an unenforceable and unprotective 120 parts per billion sulfate rule.

Ronald R. Funes
901 Boulder Drive
apt 212
Hermantown, Minnesota
55811

RECEIVED

17 AUG 25 AM 7:47

ADMINISTRATIVE
HEARINGS

Frank Pezzutto
6580 Redwood Road
Virginia, MN. 55792

RECEIVED
17 OCT -3 PM 7:25
ADMINISTRATIVE
HEARINGS

Monday, October 2, 2017

Dear Mrs. Schlatter,

Thank you for taking the time to read this letter. I am a geologist employed by a taconite producer on Minnesota's Iron Range. I currently run the Mine Engineering Department at the Keetac Facility and have been a United States Steel employee for 26 years and am very fortunate in that I love what I do. I find the challenge of helping to shape the future of this facility extremely challenging, but also extremely rewarding. The Keetac facility was idled for over 20 months, and with the help of a dedicated workforce, we have gotten this place up and running in a very efficient manner.

As a geologist, I consider myself an earth scientist. A scientist uses logic and the end results from applied testing to make sound decisions. I do not employ emotions or gut-feel to decide whether a pile of blasted rock is crude or waste. If I did, I would not have survived in this business.

I am also a wild-ricer and I appreciate a clean environment. Every fall, I look forward to the harvesting wild rice in the traditional fashion with my canoe and a pair of flails. I introduced my youngest son Christian to harvesting wild rice this fall and he thoroughly enjoyed it. Ironically, we were spent the morning in the Sandy River which is partially sourced from the Minntac Tailings Basin. The rice crop was good and so thick that we had a difficult time in finding the river channel. From doing some research, I know that the sulphate levels in this body of water is higher than what the MPCA is proposing.

The proposed MPCA sulphate standard will cripple mining here on The Range and bankrupt local municipalities. I have a son at UMD and I would like to help him out financially so that he can become a school teacher upon graduation. Furthermore, my oldest son works for a contractor that does a lot of work with the mining companies. My two boys wish to continue living here on The Range as well as my wife and I. However, the proposed sulphate standards will make this impossible.

Respectfully,



Frank Pezzutto, M Sc. Geology, M.M.

RECEIVED
17 OCT -5 AM 7: 54
ADMINISTRATIVE
HEARINGS

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

10-03-2017

Date

RE: Docket 80-90030-34519

Dear Minnesota Pollution Control Agency (MPCA):

I am writing today to urge you to carefully review all the facts and the consequences before making any decision on a sulfate water quality standard.

The MPCA's rulemaking should be science-based and inclusive of all available research. Failure to adjust the current standard to be reasonable and science-based will result in devastating financial impacts to cities and businesses throughout the state, and would result in major job losses on the Iron Range.

I support protecting wild rice. However, the proposed rule is not proven to be effective in protecting wild rice. An effective standard should use sound science that considers all of the environmental impacts to wild rice, such as water depth, water clarity, fluctuations in hydrology, invasive species, and shoreline development to determine appropriate sulfate levels.

Thousands of Iron Range residents and their families are counting on the MPCA to do the right thing and establish a water quality standard that is based on modern science. We are also counting on the MPCA to seriously reconsider its proposal to require our communities and important industries to spend hundreds of millions of dollars on wastewater treatment that might not have any significant impact on wild rice in northeast Minnesota.

Thank you for accepting my comments. Our community is counting on the MPCA to listen to us before making a final decision. There is too much at stake to get this wrong.

Sincerely,

Shelly Dincau

Full name (please print)

To: Office of Administrative Hearings
P.O. Box 64620
St. Paul MN 55164-0620

RECEIVED
17 OCT -9 AM 7:44
ADMINISTRATIVE
HEARINGS

From: Dennis Good
7140 N. Dark Lake Rd.
Britt MN 55710

Subject: Docket # 80-90030-34519 Comment Letter

On 1/18/2014, the MPCA released on their website a completed study of the effects of sulfates on wild rice. A few days later, this study-"Wild Rice Sulfate Study"- was pulled from the MPCA website. Luckily, I got there in time before it was removed. The reason for this action became clear later on when it was reported that a "contentious" meeting was held between our local pay-to-play politicians and the MPCA Commissioner, John Stine. In this meeting, these politicians demanded that the study be removed (covered up) and that no further actions be taken without their approval. Later on came the announcement that a new "study" would be conducted. Of course the commissioner caved.

The "Wild Rice Sulfate Study" was commissioned and funded by the state legislature in 2011 after they tried to legislate away the 10mg/l standard to grease the skids for Polymet, Twin Metals and Minntac. The EPA informed them (as if they didn't already know) that their and state regulators actions (and inactions for almost 40 years) violated the Clean Water Act, in that a scientifically valid rule-the 10mg/l rule- can't be invalidated without scientific evidence that it is invalid. Hence, the Wild Rice Sulfate Study.

There were two other motives for the legislature's ordering up this study. One was, against all the odds, to discredit and invalidate the 10mg/l standard. In case that failed (and it failed spectacularly), the other objective was, and is, to delay, delay, delay and stymie by any means necessary the enforcement of the 10mg/l standard.

To show this, the following is a timeline of what I know has gone on in the 16, going on 17 years that I have been involved in this issue.

In 2001, U.S. Steel came out with a project proposal called the "Minntac Water Diversion Project" with the MPCA as the RGU. The reason given to the public for this project was that there was too much water in the Minntac Tailings Basin and they needed to get rid of some of it by siphoning it over top of the dam into the Dark and or Sandy River(s). Some time later, I heard that Minntac would be making a presentation about this project at a CIRI (Central Iron Range Initiative) meeting so I decided to attend. At this meeting I learned the real reason that Minntac wanted to do this project: to get rid of the sulfates and anything else in the tailings basin and flush it downstream to Dark Lake and any water quality problems on Dark Lake were to be attributed to failing septic systems. So Minntac lied to the public. This project was so controversial for many reasons that an EIS was required and this EIS was sent out of state to be done. From what I've been told, this is fairly unusual and I can only guess that it was sent out of state to eliminate any conflicts of interest and political meddling.

Also in 2001, Minntac signed a Schedule of Compliance (SOC) to do a feasibility study to reduce pollution in the tailings basin.

In 2003, the SOC was amended. Minntac agreed to focus its study on a "Packed-Bed Bioreactor" system to reduce sulfate levels in the tailings basin. This system was later abandoned because it would have made conditions worse by elevating methylmercury levels. More on this subject later.

In 2006, the Water Diversion Project EIS came out and Minntac's goal of flushing their toilet into the Dark River was not realized. Minntac agreed to apply for a new NPDES permit but also wanted variances for all their toxic discharges. An application was submitted and at the same time two new proposals came up. One was a "Seepage Collection and Return System" to the Sandy River which may have some merit but why only on the Sandy River and not the Dark River? More on this later. The other proposal was "further study" of the link between sulfates and wild rice even though this subject was thoroughly discussed in the EIS in one of the Tech Memos. Delay, delay, delay.

Before I go on, I should explain that although Minntac wasn't allowed their toilet flush, they are allowed seepage points at the tailings basin under 30 year old expired NPDES Permits. The sulfate levels at the Dark and Sandy River seepage points average between 800 and 1100 mg/l, 80 to 110 times the 10mg/l standard. These are 2011 numbers, the latest that I have. The Dark River levels are higher but why this is, I don't know.

In 2007, a new SOC was signed between Minntac and the MPCA under which Minntac would "explore the feasibility" of the Seepage Collection and Return System to the Sandy River and to explore other new treatment methods.

In 2009, Minntac submitted a revised NPDES Permit Application in which it proposed to install a process water treatment system to treat water in the tailings basin. They claimed this system would lower the concentrations of sulfates and other pollutants in the tailings basin by 50% in 5 years.

Almost immediately after this revised NPDES Application was filed, Minntac asked the MPCA to not issue a permit so that they could explore "refinements" to this water treatment system. More delay, delay, delay. But they did install the Seepage Collection and Return System on the Sandy River.

So why the Sandy River and not the Dark River? Sulfate levels at the Dark River seep (SD001) at the tailings basin average about 150 mg/l higher than at the Sandy River seep (SD002). The answer is that the water and pollutants in the Sandy River eventually wind up in Lake Vermilion. There's a lot of money on Lake Vermilion and since money means political power, when this money makes phone calls, sends e-mails and asks questions, they are listened to and their desired outcomes are achieved. We on Dark Lake, a de facto extension of the Minntac tailings basin, don't have much money and therefore, no political power.

In 2010, Minntac came up with another plan that would end the use of wet scrubbers on its 4 largest lines and replace the wet scrubbers with a "dry air technology" that allegedly would "achieve significant reductions in the mass of pollutants transferred to the tailings basin". Sulfates would be reduced from 850-1100mg/l to 476 mg/l (47 times the 10 mg/l standard). Bye, bye water treatment system in 5 years and hello more delay, delay, delay.

In 2011, along comes another SOC under which Minntac agreed to replace the wet scrubbers with dry air technology and to install a Seepage Collection and Return System on the Dark River seep. As we shall see, this illusion was soon shattered.

In 2013, this agreement was amended because a groundwater test well showed water exceeding drinking water standards for sulfates and total dissolved solids. Minntac now had to install a “permeable reactive barrier” to control this contamination.

Back to 2011. Minntac wanted a permit for a 483 acre mine expansion. The MNDNR in 2013 refused to require an EIS on the mine expansion pointing to the 2011 SOC. The MCEA sued over this decision and lost, the Appeals Court also falling back on the 2011 SOC. On page 29 of the Mine Expansion EAW, as a condition of receiving this permit, Minntac was required to operate under the 2011 SOC and to complete the Seepage Collection and Return System on the Dark River by 2013.

Minntac received its permit and when it did, it reneged on the 2011 SOC. Thanks suckers! The moneyed class on Lake Vermilion got what they wanted but t.s. for Dark Lake.

In 2013, the EPA forced the MPCA to sign its own SOC and gave it 5 years to get going on re-issuing expired NPDES Permits for Minntac and other mines.

In 2015, the MPCA sent U.S. Steel (Minntac) a letter demanding compliance with the 2011 SOC. Minntac refused to comply and said they wanted to renegotiate the 2011 SOC. More lies and delay, delay, delay.

So in 2015, the MPCA after U.S. Steel/Minntac reneged on the 2011 SOC, decided to issue a new Draft NPDES Permit with tougher water quality standards. But U.S. Steel/Minntac backed by our local pay-to-play politicians and our spineless governor blocked this plan. Why? Because U.S. Steel/Minntac wouldn't accept having to clean up any pollution. Then our local pay-to-play legislators got the rest of our pay-to-play legislators in the state to pass a law prohibiting the MPCA from enforcing the 10 mg/l standard and to dream up a new “Flexible Standard” using “equations” and “algorithms”.

Also in 2015, Water Legacy petitioned the EPA to strip the state and the MPCA of its authority to enforce the Clean Water Act. This issue is still up in the air.

In 2016, immediately after the election, the MCEA and 2 other NGO's sued the MPCA over its failure to control pollution from the Minntac tailings basin. A week later the MPCA issued a Draft Permit for Minntac with tougher water quality standards. The MCEA agreed to withdraw its lawsuit under a stipulation agreement that one; the MPCA issue a Final Draft as quickly as possible and two, the MCEA could revive its lawsuit at any time. U.S. Steel/Minntac countersued the MPCA and the MPCA countersued. And this aside from these upcoming Administrative Hearings, are more or less where things stand now.

I mentioned at the beginning of this documentary the motives behind the legislature's funding of the original 2011 study, one being to invalidate the 10 mg/l standard and that that goal failed. The Wild Rice Sulfate Study of 2011 completely validated the 10 mg/l standard. John Pastor, the lead scientist of this study said publicly that “we always knew the 10 mg/l standard was valid but we didn't know why. Now

we know". The peer reviewers of this study said that, just as one must limit mercury to prevent the formation of toxic methylmercury, "sulfide is harmful but sulfate is what has to be regulated".

The following is a direct quote from an MPCA e-mail notice to anyone signed to receive updates on the "new" sulfate standard : " The sediment sulfide originates from sulfate in the water but certain factors change the rate at which sulfate is converted to sulfide in the sediment. Most significantly, higher levels of iron in the sediment can lead to less sulfide and higher levels of organic carbon can lead to more sulfide. So while sulfate may create conditions that negatively affect wild rice, no single level of sulfate can be protective of wild rice in all bodies of water". You can see how the MPCA ties itself into knots trying to justify this "New Flexible Standard" with "equations" and "algorithms". Sulfide originates from sulfate in the water. Exactly what the peer reviewers of the 2011 study said. But then they go on to say that higher levels of iron in the sediment can lead to less sulfide. This directly contradicts John Pastor who has stated publicly that this notion is scientifically unsound. But this idea fits perfectly with U.S. Steel/Minntac's strategy which is that, since there's iron in everyone's water (surface and ground), the problem will take care of itself and we don't have to do anything. How convenient.

This "Flexible Standard" is a non sequitur. A flexible standard is no standard at all. Whatever numbers and data are entered into these equations and algorithms, can and will be, manipulated to produce the desired outcomes. For U.S. Steel/Minntac, these outcomes are that nothing has to be done to clean up the tailings basin, the Dark River and Dark Lake, and to keep the Dark River and Dark Lake off of the list of Wild Rice Waters forever. The latest sulfate numbers that I have were taken at two stations on the Dark River in January 2014. Station D1 is about 4.4 river miles from the tailings basin. The sulfate level there was 814 mg/l. Station D1A is about 9 river miles from the tailings basin. The sulfate level there was 390mg/l. It should be obvious to anyone why the Dark River System (including Dark Lake) is not on the State Wild Rice Waters List and why U.S. Steel/Minntac doesn't want it on the list.

But there is a much larger public health issue concerning sulfates and that is the essential role that sulfates play in the conversion of mercury to methylmercury, a highly potent neurotoxin. This is a subject that the MPCA, MNDNR, our pay-to-play politicians, the Chamber of Commerce and mining interests do not want to talk about. To prove this, here is Exhibit A: In 2013, the MPCA pulled out of a 4 year old, federally funded research project to rid toxic methylmercury from fish in the St. Louis River. This project was a collaboration between the MPCA, EPA, the Fond du Lac Band and the Wisconsin Department of Natural Resources. So why did the MPCA pull out of this project after the EPA had spent nearly \$1 million dollars on this effort? It's because this project was using a federally sanctioned computer model designed to analyze how mercury gets into the food chain using inputs of data including sulfate levels. Because most of the sulfates come from the Iron Range, this is a bridge that our state players will not cross. The MPCA says, "They all say it's sulfates. We know that sulfate is a factor but it's not the only factor". Technically, this is true but out of all the factors (sulfates, water temperature, water flow, sunlight, dissolved organic carbon, oxygen, sulfate-reducing bacteria and organic matter) sulfates are the only factor that can be controlled unless the will to spend enormous amounts of money is there. As the 2011 Study peer-reviewers said, "sulfate is what has to be regulated".

The 10 mg/l standard is scientifically valid, was recently peer reviewed and found to be valid and necessary. The fact that Minnesota is the only state to have a 10mg/l Wild Rice Standard is irrelevant. Whether sulfate is directly toxic to wild rice or only when converted to sulfide is also irrelevant. This new "flexible standard" is a product of politics and money and only serves to delay, delay, delay. It should be rejected outright.

I've attempted in this letter to spell out what I know about this subject but others know much more so I will be looking forward to attending some of these hearings to learn more. But if past is prologue, there is more to come.

Thanks for your time

Dennis Good
7140 N. Dark Lake Rd.
Britt MN 55710

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

10-10-17

Date

RE: Docket 80-90030-34519

Dear Minnesota Pollution Control Agency (MPCA):

I am writing today to urge you to carefully review all the facts and the consequences before making any decision on a sulfate water quality standard.

The MPCA's rulemaking should be science-based and inclusive of all available research. Failure to adjust the current standard to be reasonable and science-based will result in devastating financial impacts to cities and businesses throughout the state, and would result in major job losses on the Iron Range.

I support protecting wild rice. However, the proposed rule is not proven to be effective in protecting wild rice. An effective standard should use sound science that considers all of the environmental impacts to wild rice, such as water depth, water clarity, fluctuations in hydrology, invasive species, and shoreline development to determine appropriate sulfate levels.

Thousands of Iron Range residents and their families are counting on the MPCA to do the right thing and establish a water quality standard that is based on modern science. We are also counting on the MPCA to seriously reconsider its proposal to require our communities and important industries to spend hundreds of millions of dollars on wastewater treatment that might not have any significant impact on wild rice in northeast Minnesota.

Thank you for accepting my comments. Our community is counting on the MPCA to listen to us before making a final decision. There is too much at stake to get this wrong.

Sincerely,

Clifford Patrick Haavisto

Full name (please print)

RECEIVED
17 OCT 12 AM 9:08
ADMINISTRATIVE
HEARINGS

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

10-10-17
Date

RE: Docket 80-90030-34519

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Sincerely,

Logan Patrick Haavisto
Full name (please print)

RECEIVED
17 OCT 12 AM 8:07
ADMINISTRATIVE
HEARINGS

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

10-10-17
Date

RE: Docket 80-90030-34519

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Sincerely,

Karin Kaye Haavisto

Full name (please print)

RECEIVED
17 OCT 12 AM 8:00
ADMINISTRATIVE
HEARINGS

RECEIVED
17 OCT 12 AM 8:46
ADMINISTRATIVE
HEARINGS

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

10-10-17
Date

RE: Docket 80-90030-34519

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Tanner Steven Haayisto
Full name (please print)

RECEIVED

17 OCT 16 AM 9:14

ADMINISTRATIVE
HEARINGS

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

10/12/17
Date

RE: Docket 80-90030-34519

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Sincerely,

JOHN RAPPUCHI

Full name (please print)

RECEIVED
17 OCT 16 AM 9:30

ADMINISTRATIVE
HEARINGS

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

10-12-17
Date

RE: Docket 80-90030-34519

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Thank you for accepting my comments. Our community is counting on the MPCA to listen to us before making a final decision. There is too much at stake to get this wrong.

Sincerely,

JOHN E. JOKINEN

Full name (please print)



Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 16 AM 9:15
ADMINISTRATIVE
HEARINGS

RE: Docket 80-90030-34519

To whom it may concern:

I am a dedicated employee of Cleveland Cliffs, which employs over 1,700 people in Northeastern Minnesota, and am writing with concerns about the state's proposed sulfate water quality standard.

In 1973, the MPCA enacted a wild rice sulfate standard based on research from the 1940s with the goal of protecting wild rice. Today – nearly 45 years later – new research that applied modern experimental and analytical techniques has shown that sulfate in and of itself is not harmful to wild rice. Instead, the MPCA suggests that sulfide may have an effect on wild rice. However, instead of using this knowledge to conduct further research to understand how and to what extent sulfide may impact wild rice growth, the MPCA has moved forward with a draft wild rice sulfate standard based on an inaccurate equation to derive a sulfate water quality standard. This rule could financially devastate my community and has not been proven to protect wild rice.

I believe wild rice is an important crop, and I want to maintain its vitality. However, this proposed standard does not appear to accomplish that goal. At a March 2017 meeting in Northeast Minnesota, an MPCA official was asked if the new standard and the investments made to comply with the standard would result in more abundant rice. The MPCA official said that based on the research there may be no benefit to the wild rice species. In fact, according to the Minnesota Cultivated Wild Rice Council, the crop is currently plentiful and our state is one of the world's largest producers of cultivated wild rice, producing 5-10 million pounds annually. Nonetheless, the MPCA is moving forward with this misguided standard.

According to the MPCA, the only viable treatment option to meet the proposed standard is reverse osmosis. Reverse osmosis is costly to install and maintain. If the standard is implemented, many businesses, communities, and families will have to cover the cost. I understand it may increase household sewer and water bills in some communities by nearly five times the current cost. This cost is burdensome and unacceptable given that the proposed standard has not been scientifically proven to protect wild rice.

Our strongest industry in Northeast Minnesota is iron ore mining. For more than 130 years, this industry has worked in collaboration with many of our communities to build and grow the region. The proposed rule is predicted to cost over \$1 billion in water treatment costs, a large portion of which would be borne by taconite mines. This is an investment that could alternatively be made to advance job growth and innovative new projects that will bring the industry to a brighter future. This cost could affect the mines' ability to stay open, and in turn, could affect my job and the health of my community.

The Minnesota State Legislature is aware of these costs and granted the MPCA an extension on publishing the standard in order to complete an economic impact analysis. Instead, the agency chose to publish the rule before completing the study that would inform regulated entities the true cost of implementing the rule.

For these reasons, I respectfully ask the Administrative Law Judge to return the MPCA's proposed rule; ask the agency to incorporate available sulfide science that applies good research practices and adopt the recommendations by the highly-respected scientific research firm, Ramboll ENVIRON. MPCA's adoption of their findings will reduce the error rate of the sulfate equation to 4% and address scientific shortcomings identified by Fort Environmental Labs (FEL) and MPCA's peer review panel. The two Ramboll ENVIRON recommendations are:

- a. To increase the toxic sulfide threshold based on evidence from the MPCA and FEL research, and
- b. To adjust the waterbodies included in the dataset used to develop the equation to only include those that are recommended as draft wild rice waters.

Your consideration of these two recommendations will improve the proposed rule and ensure longevity for the iron ore mines of Minnesota which help me provide for my family.

Sincerely,



Robert Pearson
2717 5th Ave E
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

October 7, 2017
Date

RE: Docket 80-90030-34519

Dear Minnesota Pollution Control Agency (MPCA):

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Sincerely,

Corie A Ekholm
Full name (please print)

RECEIVED
17 OCT 16 AM 8:58
ADMINISTRATIVE
HEARINGS

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 17 AM 7:55
ADMINISTRATIVE
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I believe wild rice is an important crop, and I want to maintain its vitality. However, this proposed standard does not appear to accomplish that goal. At a March 2017 meeting in Northeast Minnesota, an MPCA official was asked if the new standard and the investments made to comply with the standard would result in more abundant rice. The MPCA official said that based on the research there may be no benefit to the wild rice species. In fact, according to the Minnesota Cultivated Wild Rice Council, the crop is currently plentiful and our state is one of the world's largest producers of cultivated wild rice, producing 5-10 million pounds annually. Nonetheless, the MPCA is moving forward with this misguided standard.

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Your consideration of these two recommendations will improve the proposed rule and ensure longevity for the iron ore mines of Minnesota which help me provide for my family.

Sincerely,



Mark J. Sartori
1908 E 35 St
Hibbing, MN 55746

RECEIVED

17 OCT 17 AM 7:55

ADMINISTRATIVE
HEARINGS

10-15-17

Date

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RE: Docket 80-90030-34519

Dear Minnesota Pollution Control Agency (MPCA):

I am writing today to urge you to carefully review all the facts and the consequences before making any decision on a sulfate water quality standard.

The MPCA's rulemaking should be science-based and inclusive of all available research. Failure to adjust the current standard to be reasonable and science-based will result in devastating financial impacts to cities and businesses throughout the state, and would result in major job losses on the Iron Range.

I support protecting wild rice. However, the proposed rule is not proven to be effective in protecting wild rice. An effective standard should use sound science that considers all of the environmental impacts to wild rice, such as water depth, water clarity, fluctuations in hydrology, invasive species, and shoreline development to determine appropriate sulfate levels.

Thousands of Iron Range residents and their families are counting on the MPCA to do the right thing and establish a water quality standard that is based on modern science. We are also counting on the MPCA to seriously reconsider its proposal to require our communities and important industries to spend hundreds of millions of dollars on wastewater treatment that might not have any significant impact on wild rice in northeast Minnesota.

Thank you for accepting my comments. Our community is counting on the MPCA to listen to us before making a final decision. There is too much at stake to get this wrong.

Sincerely,

Kristy Marie Suikonen

Full name (please print)

RECEIVED

17 OCT 17 AM 7:55

ADMINISTRATIVE
HEARINGS

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Date

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Sincerely,

William Eino Suikonen

Full name (please print)

RECEIVED

17 OCT 17 AM 7:52

ADMINISTRATIVE
HEARINGS

10-12-17
Date

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P.O. Box 64620
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Sincerely,


Full name (please print)





RECEIVED

17 OCT 18 AM 7:26

ADMINISTRATIVE
HEARINGS

Mail to:

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RE: Wild Rice / Sulfate Water Standard (Docket 80-90030-34519)

Date:

To Whom It May Concern:

I am an employee of United States Steel and a member of United Steelworkers Union. I am writing to you with my concerns on the above referenced Wild Rice Water Standard.

It is my understanding that the Minnesota Pollution Control Agency (MPCA) is proposing changes to the 1973 sulfate standard of 10 mg/L - a standard based on field observations in the 1930s and 1940s and rarely applied in Minnesota. Minnesota is also the only state with a wild rice standard, although other states have wild rice. MPCA's initial position was that sulfate was the cause of wild rice decline. However, further testing and analysis conducted by researchers for MPCA demonstrated that sulfate, in and of itself, does not impact wild rice. Therefore, a sulfate standard is unnecessary.

MPCA now suggests that sulfate may impede wild rice growth by converting to sulfide in low-oxygen conditions in the sediment. However, the laboratory conditions researchers simulated do not occur in nature. The part of the plant affected by sulfide in the lab was not in the sediment, but in the surface water. In nature, that surface water has enough oxygen that sulfide does not exist. When the research was repeated by Fort Environmental Labs using the MPCA's Peer Review Panel recommendations the sulfide level of concern was in fact much higher than MPCA's proposal of 120 ug/L, with no effect below 1,600 ug/L, and minimal effect up to 12,800 ug/L. This additional study, which was Peer Reviewed and rigorously evaluated before being published, is not being given proper weight in the proposed rule. Moreover, the current proposal does not account for impacts from other known wild rice stressors - such as water depth, water clarity, fluctuations in hydrology, invasive species, shoreland development, etc. The MPCA acknowledges these other stressors have an impact, but says that they lack the resources to evaluate them. It is irresponsible to propose a regulation where the agency selectively determines what to include in the analysis.

This proposed rule is a very serious matter for those of us who live and work on the Iron Range. Our families and communities rely on iron mining and all the related businesses and jobs. We also cherish and protect our environment, including wild rice. Based on the research a sulfate standard is not necessary and compliance costs would be staggering. However, if a standard is promulgated, at a minimum it needs to be based on the sulfide work by Fort Environmental Labs. The draft rule as proposed runs a risk of serious consequences for thousands of hardworking Steelworkers and their families, as well as, the future of mining on the Iron Range, and our communities without a clear benefit to wild rice. Please consider the future of my family and the Iron Range.

Sincerely,

(Name) *Michael Dee*

(Address) *408 S. 10th Ave
Virginia, Mn
55792*

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RE: Docket 80-90030-34519

RECEIVED
17 OCT 18 AM 7:45
ADMINISTRATIVE
HEARINGS

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Sincerely,

Jared Harris
12965 Old Hwy 169
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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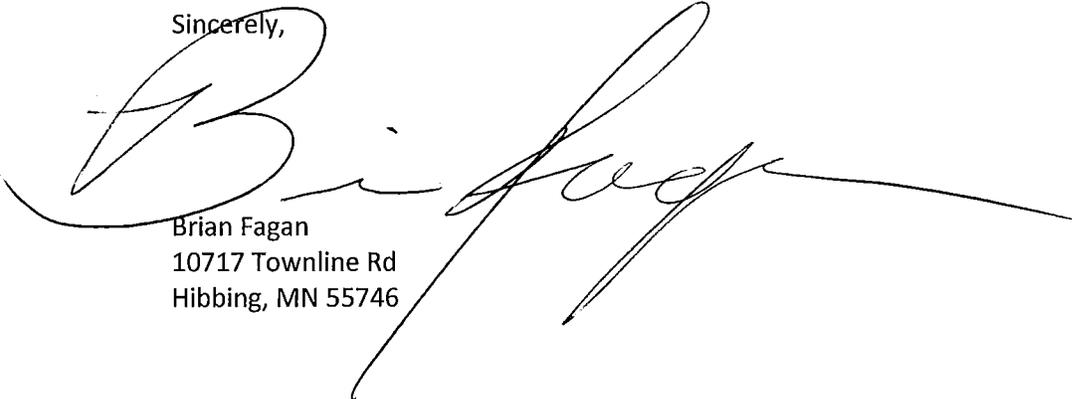
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Sincerely,


Brian Fagan
10717 Townline Rd
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely

John F. Smith



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John Smith
41277 CO Rd 336
Bovey, MN 55709

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely,

A handwritten signature in black ink, appearing to read 'William Lehto', with a long horizontal flourish extending to the right.

William Lehto
12059 Hwy 22
Cook, MN 55723

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 18 AM 7:46
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Sincerely,

A handwritten signature in black ink, appearing to read "Jordan Champa". The signature is fluid and cursive, written in a dark ink on a white background.

Jordan Champa
12015 W 32nd Street 401
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 18 AM 7:50
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- a. To increase the toxic sulfide threshold based on evidence from the MPCA and FEL research, and
- b. To adjust the waterbodies included in the dataset used to develop the equation to only include those that are recommended as draft wild rice waters.

Your consideration of these two recommendations will improve the proposed rule and ensure longevity for the iron ore mines of Minnesota which help me provide for my family.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael Yaroscak".

Michael Yaroscak
325 NW 9th St
Chisholm, MN 55719

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 18 AM 7:51
ADMINISTRATIVE
HEARINGS

RE: Docket 80-90030-34519

To whom it may concern:

I am a dedicated employee of Cleveland Cliffs, which employs over 1,700 people in Northeastern Minnesota, and am writing with concerns about the state's proposed sulfate water quality standard.

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I believe wild rice is an important crop, and I want to maintain its vitality. However, this proposed standard does not appear to accomplish that goal. At a March 2017 meeting in Northeast Minnesota, an MPCA official was asked if the new standard and the investments made to comply with the standard would result in more abundant rice. The MPCA official said that based on the research there may be no benefit to the wild rice species. In fact, according to the Minnesota Cultivated Wild Rice Council, the crop is currently plentiful and our state is one of the world's largest producers of cultivated wild rice, producing 5-10 million pounds annually. Nonetheless, the MPCA is moving forward with this misguided standard.

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Your consideration of these two recommendations will improve the proposed rule and ensure longevity for the iron ore mines of Minnesota which help me provide for my family.

Sincerely,

A handwritten signature in black ink that reads "James Pervenanze". The signature is written in a cursive, flowing style.

James Pervenanze
516 North East 3rd St.
Chisholm, MN 55719

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RE: Docket 80-90030-34519

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Your consideration of these two recommendations will improve the proposed rule and ensure longevity for the iron ore mines of Minnesota which help me provide for my family.

Sincerely,

A handwritten signature in black ink, appearing to read "David Myrum". The signature is fluid and cursive, with a large loop at the beginning and a long, sweeping tail.

David Myrum
12927 Old Hwy 169
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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17 OCT 18 AM 7:51
ADMINISTRATIVE
HEARINGS

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Sincerely,

A handwritten signature in black ink that reads "Jessica Mannelin-Rootes". The signature is written in a cursive style with a large initial 'J'.

Jessica Mannelin-Rootes
1727 E 39th St
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RE: Docket 80-90030-34519

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Sincerely,

A handwritten signature in black ink, appearing to read "David George". The signature is fluid and cursive, with the first name "David" being more prominent than the last name "George".

David George
39107 Scenic Hwy
Bovey, MN 55709

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 18 AM 7:44
ADMINISTRATIVE
HEARINGS

RE: Docket 80-90030-34519

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Sincerely,

A handwritten signature in cursive script that reads "Michael A. Mandich".

Michael Mandich
12043 Corey Tracts Rd
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 18 AM 7:43
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HEARINGS

RE: Docket 80-90030-34519

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Sincerely,

Kevin Corbett
403 Coventry Rd
Hoyt Lakes, MN 55750

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely,

A handwritten signature in cursive script that reads "Bill Buchwitz". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Bill Buchwitz
11063 Herman Road
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 18 AM 7:53
ADMINISTRATIVE
HEARINGS

RE: Docket 80-90030-34519

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Sincerely,

A handwritten signature in cursive script that reads "Cynthia Gallagher".

Cynthia Gallagher
3818 Vermilion Trail
Aurora, MN 55705

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RE: Docket 80-90030-34519

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Your consideration of these two recommendations will improve the proposed rule and ensure longevity for the iron ore mines of Minnesota which help me provide for my family.

Sincerely,

A handwritten signature in black ink, appearing to read "Jacob Stachovich", with a long horizontal flourish extending to the right.

Jacob Stachovich
420 6 Ave N.
Biwabik, MN 55708

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 18 AM 7:57
ADMINISTRATIVE
HEARINGS

RE: Docket 80-90030-34519

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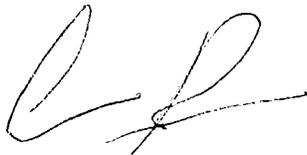
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Sincerely,

A handwritten signature in black ink, appearing to read 'Lisa Alton Packa', with a stylized flourish at the end.

Lisa Alton Packa
2720 7th Ave E
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RE: Docket 80-90030-34519

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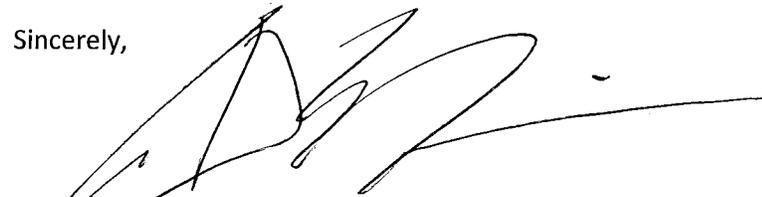
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Sincerely,



Aaron Moellering
2624 4th Ave E
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely,

A handwritten signature in black ink, appearing to read "Brian Bjelland", written in a cursive style.

Brian Bjelland
3574 South Estates Drive
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely,

Ty Davey
529 4th St SW
Chisholm, MN 55719

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 18 AM 7:56
ADMINISTRATIVE
HEARINGS

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Sincerely,

A handwritten signature in cursive script, appearing to read "Bruce W. Bjelland".

Bruce Bjelland
38441 State Hwy 65
Nashwauk, MN 55769

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 18 AM 7:55
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Concerned Employee
William Elad

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Sincerely,

A handwritten signature in cursive script that reads "William Glad Jr." with a period at the end.

William Glad Jr
3429 19th Ave E
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RE: Docket 80-90030-34519

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Sincerely,

A handwritten signature in black ink, appearing to read "Michael Rootes", with a long horizontal flourish extending to the right.

Michael Rootes
1727 E 39th St
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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BRIAN FORSMAN

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Your consideration of these two recommendations will improve the proposed rule and ensure longevity for the iron ore mines of Minnesota which help me provide for my family.

Sincerely,

A handwritten signature in black ink that reads "Brian Forsman". The signature is written in a cursive style with a long horizontal flourish at the end.

Brian Forsman
224 Linda Drive
Aurora, MN 55705

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 18 AM 7:57
ADMINISTRATIVE
HEARINGS

RE: Docket 80-90030-34519

To whom it may concern:

I am a dedicated employee of Cleveland Cliffs, which employs over 1,700 people in Northeastern Minnesota, and am writing with concerns about the state's proposed sulfate water quality standard.

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Sincerely,

A handwritten signature in black ink that reads "John Packa". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

John Packa
2720 7th Ave E
Hibbing, MN 55746

P.S. Please stop being so foolish.

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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17 OCT 18 AM 7:58
ADMINISTRATIVE
HEARINGS

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Sincerely,

A handwritten signature in cursive script that reads "Richard Seopa". The signature is written in black ink and is positioned below the word "Sincerely,".

Richard Seopa
7609 Pinetree Road
Side Lake, MN 55781

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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17 OCT 18 AM 7:58
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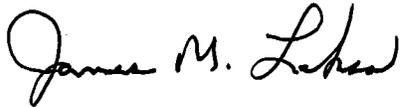
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Sincerely,

A handwritten signature in black ink that reads "James M. Lakso". The signature is written in a cursive, flowing style.

James Lakso
14 E 5th Avenue North
Aurora, MN 55705

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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17 OCT 18 AM 7:58
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Sincerely,

A handwritten signature in cursive script that reads "Danny Lindsay". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Danny Lindsay
3991 Dillon Road
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RE: Docket 80-90030-34519

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Sincerely,

A handwritten signature in cursive script that reads "Justin Blazewicz". The signature is written in black ink and is positioned below the word "Sincerely,".

Justin Blazewicz
5499 Marion Lane
Virginia, MN 55792

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RE: Docket 80-90030-34519

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Sincerely,

 (27 yr. employee of Cliffs)

Ted Sinnott
305 South Inner Drive
Hibbing, MN 55746



RECEIVED
17 OCT 18 AM 7:57

ADMINISTRATIVE
HEARINGS

10-12-17
Date

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RE: Docket 80-90030-34519

Dear Minnesota Pollution Control Agency (MPCA):

I am writing today to urge you to carefully review all the facts and the consequences before making any decision on a sulfate water quality standard.

The MPCA's rulemaking should be science-based and inclusive of all available research. Failure to adjust the current standard to be reasonable and science-based will result in devastating financial impacts to cities and businesses throughout the state, and would result in major job losses on the Iron Range.

I support protecting wild rice. However, the proposed rule is not proven to be effective in protecting wild rice. An effective standard should use sound science that considers all of the environmental impacts to wild rice, such as water depth, water clarity, fluctuations in hydrology, invasive species, and shoreline development to determine appropriate sulfate levels.

Thousands of Iron Range residents and their families are counting on the MPCA to do the right thing and establish a water quality standard that is based on modern science. We are also counting on the MPCA to seriously reconsider its proposal to require our communities and important industries to spend hundreds of millions of dollars on wastewater treatment that might not have any significant impact on wild rice in northeast Minnesota.

Thank you for accepting my comments. Our community is counting on the MPCA to listen to us before making a final decision. There is too much at stake to get this wrong.

Sincerely,

Jayanne Suikkonen *Jayanne Suikkonen*
Full name (please print)

*PO Box 394
Tower MN 55790*



RECEIVED
17 OCT 18 AM 7:57
ADMINISTRATIVE
HEARINGS

10-12-17
Date

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P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely,

William Suikonen
Full name (please print)

PO Box 394

Tower MN 55790

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 20 AM 8:29
ADMINISTRATIVE
HEARINGS

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Sincerely,



Print Name: Jeff Smerud
Address: 9118 Little Sweden Road
City, state, zip code:
Cook, mn. 55723

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Your consideration of these two recommendations will improve the proposed rule and ensure longevity for the iron ore mines of Minnesota which help me provide for my family.

Sincerely,

Handwritten signature of Daniel Klimek and the date 10/14/07.

Daniel Klimek
3927 12 Ave E
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RE: Docket 80-90030-34519

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Sincerely,

A handwritten signature in black ink, appearing to read "Kristy Gonzales", with a long horizontal flourish extending to the right.

Kristy Gonzales
3927 12 Ave E
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 20 AM 9:03
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A handwritten signature in black ink, appearing to read 'Cade Raukar', with a long horizontal flourish extending to the right.

Cade Raukar
2614 Diane Lane
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely,

Kevin Rahmlow
100 Albatross
Gwinn, MI 49841



Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely,

A handwritten signature in cursive script that reads "Karl Baird". The signature is written in black ink and is positioned above the typed name and address.

Karl Baird
11595 Co Rd 27
Northome, MN 56661

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Richard Hooper
400 Nw 8th St
Chisholm, MN 55719

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Donald Varichak
3992 Dillon Rd
Hibbing, MN 55746

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P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely,



Electronic Repair - Hibbing Tecomite

Wade Bexell
4109 Saari Road
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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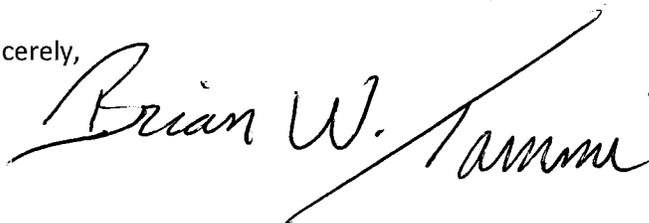
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- b. To adjust the waterbodies included in the dataset used to develop the equation to only include those that are recommended as draft wild rice waters.

Your consideration of these two recommendations will improve the proposed rule and ensure longevity for the iron ore mines of Minnesota which help me provide for my family.

Sincerely,

A handwritten signature in black ink that reads "Brian W. Tammi". The signature is written in a cursive style with a long, sweeping underline that extends across the width of the name.

Brian Tammi
3125 2nd Ave W
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 20 AM 9:02
ADMINISTRATIVE
HEARINGS

RE: Docket 80-90030-34519

To whom it may concern:

I am a dedicated employee of Cleveland Cliffs, which employs over 1,700 people in Northeastern Minnesota, and am writing with concerns about the state's proposed sulfate water quality standard.

In 1973, the MPCA enacted a wild rice sulfate standard based on research from the 1940s with the goal of protecting wild rice. Today – nearly 45 years later – new research that applied modern experimental and analytical techniques has shown that sulfate in and of itself is not harmful to wild rice. Instead, the MPCA suggests that sulfide may have an effect on wild rice. However, instead of using this knowledge to conduct further research to understand how and to what extent sulfide may impact wild rice growth, the MPCA has moved forward with a draft wild rice sulfate standard based on an inaccurate equation to derive a sulfate water quality standard. This rule could financially devastate my community and has not been proven to protect wild rice.

I believe wild rice is an important crop, and I want to maintain its vitality. However, this proposed standard does not appear to accomplish that goal. At a March 2017 meeting in Northeast Minnesota, an MPCA official was asked if the new standard and the investments made to comply with the standard would result in more abundant rice. The MPCA official said that based on the research there may be no benefit to the wild rice species. In fact, according to the Minnesota Cultivated Wild Rice Council, the crop is currently plentiful and our state is one of the world's largest producers of cultivated wild rice, producing 5-10 million pounds annually. Nonetheless, the MPCA is moving forward with this misguided standard.

According to the MPCA, the only viable treatment option to meet the proposed standard is reverse osmosis. Reverse osmosis is costly to install and maintain. If the standard is implemented, many businesses, communities, and families will have to cover the cost. I understand it may increase household sewer and water bills in some communities by nearly five times the current cost. This cost is burdensome and unacceptable given that the proposed standard has not been scientifically proven to protect wild rice.

Our strongest industry in Northeast Minnesota is iron ore mining. For more than 130 years, this industry has worked in collaboration with many of our communities to build and grow the region. The proposed rule is predicted to cost over \$1 billion in water treatment costs, a large portion of which would be borne by taconite mines. This is an investment that could alternatively be made to advance job growth and innovative new projects that will bring the industry to a brighter future. This cost could affect the mines' ability to stay open, and in turn, could affect my job and the health of my community.

The Minnesota State Legislature is aware of these costs and granted the MPCA an extension on publishing the standard in order to complete an economic impact analysis. Instead, the agency chose to publish the rule before completing the study that would inform regulated entities the true cost of implementing the rule.

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Your consideration of these two recommendations will improve the proposed rule and ensure longevity for the iron ore mines of Minnesota which help me provide for my family.

Sincerely,

Thomas Autio Jr
8891 Hwy 101
Iron, MN 55751

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Your consideration of these two recommendations will improve the proposed rule and ensure longevity for the iron ore mines of Minnesota which help me provide for my family.

Sincerely,

A handwritten signature in black ink that reads "Cheryl A. Hendricks". The signature is written in a cursive style with a large, stylized initial 'C'.

Cheryl Hendricks
5472 Carnation Ave
Virginia, MN 55792

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 20 AM 8:30
ADMINISTRATIVE
HEARINGS

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Sincerely,

Todd Gillitzer
1945 E 27th Street
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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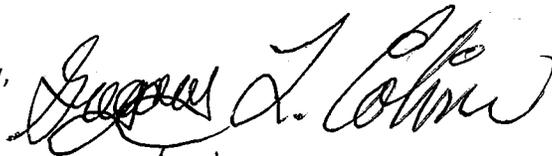
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Sincerely,



10/16/17

Gregory Colvin
104 North Norman Ave
Eveleth, MN 55734

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RE: Docket 80-90030-34519

RECEIVED
17 OCT 20 AM 9:02
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Your consideration of these two recommendations will improve the proposed rule and ensure longevity for the iron ore mines of Minnesota which help me provide for my family.

Sincerely,

A handwritten signature in cursive script that reads "Shane Sheets". The signature is written in black ink and is positioned below the word "Sincerely,".

Shane Sheets
23547 M-28
McMillan, MI 49853

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 20 AM 9:02
ADMINISTRATIVE
HEARINGS

RE: Docket 80-90030-34519

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Sincerely,



John Rader
304 7th St SW
Chisholm, MN 55719

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 20 AM 8:56
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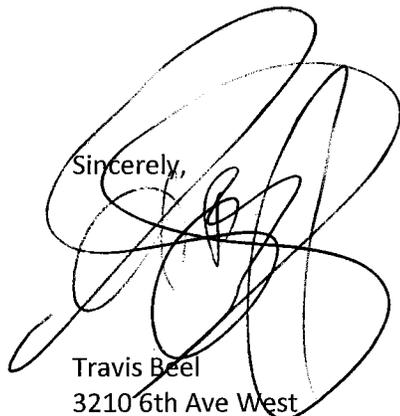
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Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'Travis Beel', is written over the 'Sincerely,' text.

Travis Beel
3210 6th Ave West
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RE: Docket 80-90030-34519

RECEIVED
17 OCT 20 AM 8:55
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Sincerely,

A handwritten signature in black ink, appearing to read "Walter Seeba". The signature is fluid and cursive, with the first name "Walter" being larger and more prominent than the last name "Seeba".

Walter Seeba
1524 13th Ave E
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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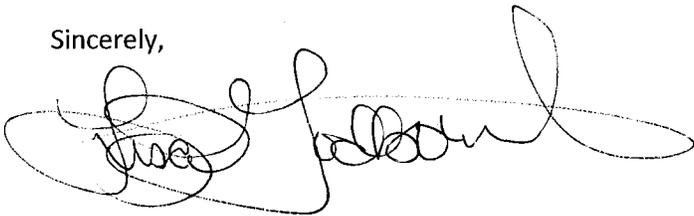
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Your consideration of these two recommendations will improve the proposed rule and ensure longevity for the iron ore mines of Minnesota which help me provide for my family.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa Godbout", written in a cursive style.

Lisa Godbout
2730 Moorhead Rd
Cloquet, MN 55720

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 20 AM 8:57
ADMINISTRATIVE
HEARINGS

RE: Docket 80-90030-34519

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Sincerely,

A handwritten signature in black ink, appearing to read "Christopher Modich". The signature is fluid and cursive, with a long horizontal stroke at the end.

Christopher Modich
310 East 32nd Street
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely,

A handwritten signature in black ink that reads "Kelly L. Triebwasser". The signature is written in a cursive style with a large, looped initial "K".

Kelly Triebwasser
7702 Gray Road
Cotton, MN 55724

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely,

A handwritten signature in black ink, appearing to read "Dean Byer". The signature is written in a cursive style with a large, circular initial "D".

Dean Byer
PO Box 131
Pengilly, MN 55775

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely,

A handwritten signature in black ink that reads "Jeffrey Koslucher". The signature is written in a cursive, flowing style.

Jeffrey Koslucher
6544 N Long Lake Rd
Chisholm, MN 55719

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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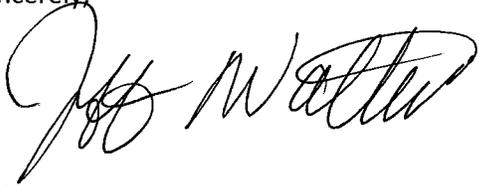
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Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Walters", written in a cursive style.

Jeffrey Walters
3805 4th Ave. E.
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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A handwritten signature in black ink that reads "Jared Erickson". The signature is written in a cursive style with a large, prominent "J" and "E".

Jared Erickson
5002 Spirit Lake Rd
Mountain Iron, MN 55768

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely,

Nathaniel Nygard
PO Box 398
Buhl, MN 55713

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Your consideration of these two recommendations will improve the proposed rule and ensure longevity for the iron ore mines of Minnesota which help me provide for my family.

Sincerely,

A handwritten signature in black ink, appearing to read 'James Pastore', with a long horizontal flourish extending to the right.

James Pastore
9608 Old Hwy 169
Mountain Iron, MN 55768

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 20 AM 8:55

ADMINISTRATIVE
HEARINGS

RE: Docket 80-90030-34519

To whom it may concern:

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Sincerely,

Barbara A. Taray - Oct. 18, 2017

Barbara Taray
PO Box 52
Meadowlands, MN 55765

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely,

A handwritten signature in black ink, appearing to read 'C. Degnan', written in a cursive style.

Christopher Degnan
802 E 37th St
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely,

Olaf Walkky
8890 Cattail Drive
Britt, MN 55710

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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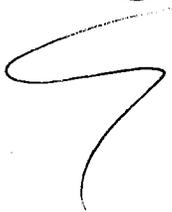
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Sincerely,

A handwritten signature in cursive script that reads "Michael Birdsall". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Michael Birdsall
5955 Baich Road
Chisholm, MN 55719

A handwritten flourish or mark consisting of a single, continuous, sweeping line that starts from the bottom left and curves upwards and to the right, ending in a small hook. It is positioned below the typed name and address.

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Carl Gibson
6568 Hwy 73
Chisholm, MN 55719

Maybe look into the DNR's "management" of bodies of water and take note of how their involvement has decreased wild rice rich lakes in this area.

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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A handwritten signature in cursive script that reads "Darrell Brandstrom". The signature is written in black ink and is positioned above the typed name and address.

Darrell Brandstrom
31190 Co Rd 52
Bigfork, MN 56628

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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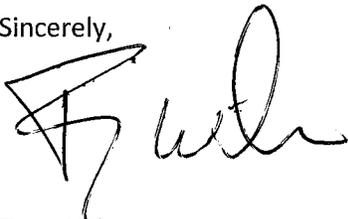
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Sincerely,

A handwritten signature in black ink, appearing to read "Terry Wilson". The signature is written in a cursive style with a large, stylized "T" and "W".

Terry Wilson
2815 23rd Ave East
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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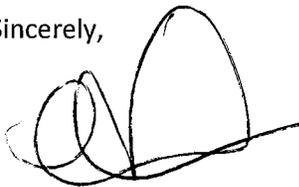
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- b. To adjust the waterbodies included in the dataset used to develop the equation to only include those that are recommended as draft wild rice waters.

Your consideration of these two recommendations will improve the proposed rule and ensure longevity for the iron ore mines of Minnesota which help me provide for my family.

Sincerely,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the end.

Brent Theien
117 Hematite St.
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 20 AM 8:56
ADMINISTRATIVE
HEARINGS

RE: Docket 80-90030-34519

To whom it may concern:

I am a dedicated employee of Cleveland Cliffs, which employs over 1,700 people in Northeastern Minnesota, and am writing with concerns about the state's proposed sulfate water quality standard.

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I believe wild rice is an important crop, and I want to maintain its vitality. However, this proposed standard does not appear to accomplish that goal. At a March 2017 meeting in Northeast Minnesota, an MPCA official was asked if the new standard and the investments made to comply with the standard would result in more abundant rice. The MPCA official said that based on the research there may be no benefit to the wild rice species. In fact, according to the Minnesota Cultivated Wild Rice Council, the crop is currently plentiful and our state is one of the world's largest producers of cultivated wild rice, producing 5-10 million pounds annually. Nonetheless, the MPCA is moving forward with this misguided standard.

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Sincerely,



Trinity Banks
9615 Allavus Road
Mt Iron, MN 55768

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely,

A handwritten signature in black ink, appearing to read 'John Brunn', with a long horizontal flourish extending to the right.

John Brunn
1151 County Rd 440
Bovey, MN 55709

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely,

A handwritten signature in black ink, appearing to read "Bartlett", with a stylized flourish extending from the end.

Alexander Bartlett
4394 Lost Lake Road
Gilbert, MN 55741

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely,

A handwritten signature in black ink, appearing to read 'Matthew Hiti', written in a cursive style.

Matthew Hiti
1406 W 2nd St
Eveleth, MN 55734

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 20 AM 8:55
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Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Roerig", with a long, sweeping underline that extends to the right.

Daniel Roerig
5727 Hwy 21
Embarrass, MN 55732

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely,

A handwritten signature in black ink, appearing to read 'Brandon Scherf', written in a cursive style.

Brandon Scherf
18919 Wendigo Park Rd
Grand Rapids, MN 55744

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely,

A handwritten signature in black ink, reading "Jeremy R. Troumbly". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Jeremy Troumbly
35563 Scenic Highway
Bovey, MN 55709

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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17 OCT 20 AM 8:42
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Sincerely,

A handwritten signature in black ink, appearing to read 'Dustin Pittman', with a long horizontal flourish extending to the right.

Dustin Pittman
4176 White Road
Mt Iron, MN 55768

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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17 OCT 20 AM 8:39
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- a. To increase the toxic sulfide threshold based on evidence from the MPCA and FEL research, and
- b. To adjust the waterbodies included in the dataset used to develop the equation to only include those that are recommended as draft wild rice waters.

Your consideration of these two recommendations will improve the proposed rule and ensure longevity for the iron ore mines of Minnesota which help me provide for my family.

Sincerely,

Troy Nelson
17032 Westwood Drive
Nashwauk, MN 55769

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RE: Docket 80-90030-34519

RECEIVED
17 OCT 20 AM 8:36
ADMINISTRATIVE
HEARINGS

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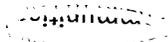
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Your consideration of these two recommendations will improve the proposed rule and ensure longevity for the iron ore mines of Minnesota which help me provide for my family.

Sincerely,



Joseph Kapsch
PO Box 281
Side Lake, MN 55781



Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 20 AM 8:34
ADMINISTRATIVE
HEARINGS

RE: Docket 80-90030-34519

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Sincerely,

A handwritten signature in black ink, appearing to read 'David Solberg', written in a cursive style.

David Solberg
12551 Co. Rd. 54
Nashwauk, MN 55769

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely,

A handwritten signature in black ink, appearing to read "Wade Yuhala", with a long horizontal flourish extending to the right.

Wade Yuhala
2601 2nd Ave W
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely,

A handwritten signature in cursive script that reads "Kevin Backman".

Kevin Backman
315 1st Ave. N.W.
Chisholm, MN 55719

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
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Sincerely,

A handwritten signature in black ink, appearing to read 'Matthew Adamson', written over a horizontal line.

Matthew Adamson
520 NW 18th Ave
Grand Rapids, MN 55744

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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17 OCT 20 AM 8:30
ADMINISTRATIVE
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Sincerely,

A handwritten signature in black ink that reads "Michael McLafferty". The signature is written in a cursive, flowing style.

Michael McLafferty
6216 Powers Rd
Hibbing, MN 55746

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 20 AM 8:29
ADMINISTRATIVE
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RE: Docket 80-90030-34519

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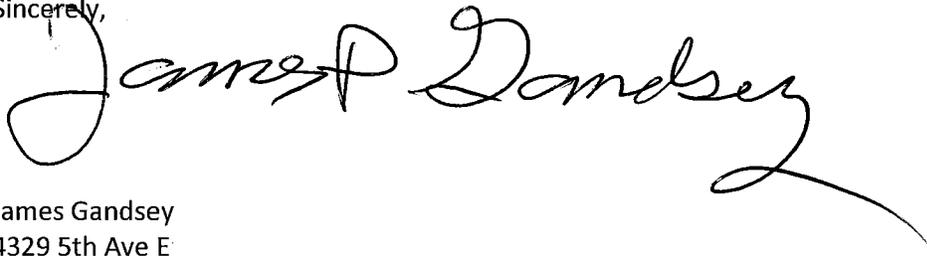
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Sincerely,

A handwritten signature in black ink that reads "James Gandsey". The signature is written in a cursive style with a large, looping initial "J" and a long, sweeping underline.

James Gandsey
4329 5th Ave E
Hibbing, MN 55746

ON WILD RICE & WATER QUALITY: WE MUST GET THIS RIGHT.

A better way to preserve wild rice
and Northeast Minnesota's economy:

Use sound science.



Visit www.taconite.org/call2action for more information.

RE: Docket 80-90030-34519

I believe wild rice is an important crop. However, the proposed wild rice sulfate rule will not protect or enhance wild rice. What is clear is that the proposed standard could financially devastate my community, and the industries we rely on to make a living.

This proposal was not put forth using sound science. In 1973, the MPCA enacted a wild rice sulfate standard based on research from the 1940s. Today, 80 years later, new research using modern techniques shows that **sulfate in and of itself is not harmful to wild rice**. Instead, the MPCA suggests that *sulfide* may have an effect on wild rice. Despite this change, the MPCA has moved forward with a draft wild rice sulfate standard based on an inaccurate equation.

The proposed rule could cost Northern Minnesota's municipal wastewater facilities AND Minnesota's iron mining facilities billions of dollars to comply. This standard will increase municipal water bills exponentially and could close Minnesota's iron mines.

Despite knowledge of these potential costs, the MPCA chose to publish their draft rule BEFORE completing an economic impact analysis to determine the true cost of compliance for Northeast Minnesota residents and businesses.

The proposed standard predicts the wrong outcome up to one in five times and would be incredibly burdensome to achieve compliance.

For these reasons, I respectfully ask that the Administrative Law Judge reject the MPCA's proposed wild rice standard so Minnesotans can work together to find better wild rice conservation efforts.

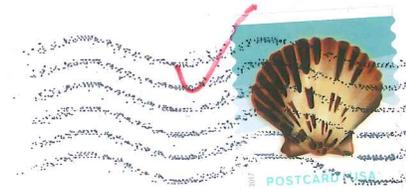
Name:

CHRISTOPHER KNIGHT

Address:

6538 REDWOOD RD, VIRGINIA MN 5592

ST PAUL MN 551
18 OCT 2017 PM 7L

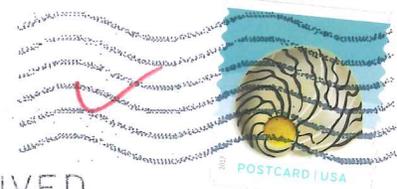


Office of Administrative Hearings
P.O. Box 64620
St. Paul, MN 55164-0620

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ADMINISTRATIVE
HEARINGS

RE: Docket 80-90030-34519

SAINT PAUL MN 550



I believe wild rice is an important crop. However, the proposed wild rice sulfate rule will not protect or enhance wild rice. What is clear is that the proposed standard could financially devastate my community, and the industries we rely on to make a living.

This proposal was not put forth using sound science. In 1973, the MPCA enacted a wild rice sulfate standard based on research from the 1940s. Today, 80 years later, new research using modern techniques shows that **sulfate in and of itself is not harmful to wild rice**. Instead, the MPCA suggests that *sulfide* may have an effect on wild rice. Despite this change, the MPCA has moved forward with a draft wild rice sulfate standard based on an inaccurate equation.

The proposed rule could cost Northern Minnesota's municipal wastewater facilities AND Minnesota's iron mining facilities billions of dollars to comply. This standard will increase municipal water bills exponentially and could close Minnesota's iron mines.

Despite knowledge of these potential costs, the MPCA chose to publish their draft rule BEFORE completing an economic impact analysis to determine the true cost of compliance for Northeast Minnesota residents and businesses.

The proposed standard predicts the wrong outcome up to one in five times and would be incredibly burdensome to achieve compliance.

For these reasons, I respectfully ask that the Administrative Law Judge reject the MPCA's proposed wild rice standard so Minnesotans can work together to find better wild rice conservation efforts.

Name:

Linda Scott

Address:

6636 Heritage Tr
Gilbert MN 55114

55114-0620

RECEIVED

17 OCT 20 AM 8:21

ADMINISTRATIVE HEARINGS

Office of Administrative Hearings

P.O. Box 64620

St. Paul, MN 55164-0620



ON WILD RICE & WATER QUALITY: WE MUST GET THIS RIGHT.

A better way to preserve wild rice
and Northeast Minnesota's economy:

Use sound science.



Visit www.faconite.org/call2action for more information.

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RE: Docket 80-90030-34519

SAINT PAUL MN 550

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10 OCT 2017 PM 2 L

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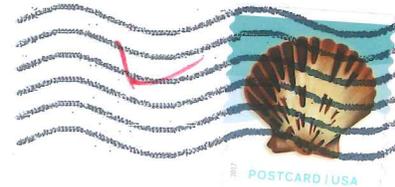
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Name: *ERIK J Carol Peterson*

Address: *303 Fairview Circle, New Virginia, MN 55792*



Office of Administrative Hearings

P.O. Box 64620

St. Paul, MN 55164-0620

RECEIVED
7 00 20 AM 8:18
ADMINISTRATIVE
HEARINGS

RE: Docket 80-90030-34519

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Name: *Don Schibel*

Address: *1025 137th St. N.
St. Paul, MN 55164-0620
VA, MN 551792*

SAINT PAUL MN 550
19 OCT 20 17 PM 3 L



Office of Administrative Hearings
P.O. Box 64620
St. Paul, MN 55164-0620

RECEIVED
19 OCT 20 AM 8:11
ADMINISTRATIVE
HEARINGS



ON WILD RICE & WATER QUALITY: WE MUST GET THIS RIGHT.

A better way to preserve wild rice
and Northeast Minnesota's economy:

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Visit www.taconite.org/call2action for more information.



RECEIVED
17 OCT 20 AM 9:08
ADMINISTRATIVE
HEARINGS

Mail to:

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RE: Wild Rice / Sulfate Water Standard (Docket 80-90030-34519)

Date:

To Whom It May Concern:

I am an employee of United States Steel and a member of United Steelworkers Union. I am writing to you with my concerns on the above referenced Wild Rice Water Standard.

It is my understanding that the Minnesota Pollution Control Agency (MPCA) is proposing changes to the 1973 sulfate standard of 10 mg/L - a standard based on field observations in the 1930s and 1940s and rarely applied in Minnesota. Minnesota is also the only state with a wild rice standard, although other states have wild rice. MPCA's initial position was that sulfate was the cause of wild rice decline. However, further testing and analysis conducted by researchers for MPCA demonstrated that sulfate, in and of itself, does not impact wild rice. Therefore, a sulfate standard is unnecessary.

MPCA now suggests that sulfate may impede wild rice growth by converting to sulfide in low-oxygen conditions in the sediment. However, the laboratory conditions researchers simulated do not occur in nature. The part of the plant affected by sulfide in the lab was not in the sediment, but in the surface water. In nature, that surface water has enough oxygen that sulfide does not exist. When the research was repeated by Fort Environmental Labs using the MPCA's Peer Review Panel recommendations the sulfide level of concern was in fact much higher than MPCA's proposal of 120 ug/L, with no effect below 1,600 ug/L, and minimal effect up to 12,800 ug/L. This additional study, which was Peer Reviewed and rigorously evaluated before being published, is not being given proper weight in the proposed rule. Moreover, the current proposal does not account for impacts from other known wild rice stressors - such as water depth, water clarity, fluctuations in hydrology, invasive species, shoreland development, etc. The MPCA acknowledges these other stressors have an impact, but says that they lack the resources to evaluate them. It is irresponsible to propose a regulation where the agency selectively determines what to include in the analysis.

This proposed rule is a very serious matter for those of us who live and work on the Iron Range. Our families and communities rely on iron mining and all the related businesses and jobs. We also cherish and protect our environment, including wild rice. Based on the research a sulfate standard is not necessary and compliance costs would be staggering. However, if a standard is promulgated, at a minimum it needs to be based on the sulfide work by Fort Environmental Labs. The draft rule as proposed runs a risk of serious consequences for thousands of hardworking Steelworkers and their families, as well as, the future of mining on the Iron Range, and our communities without a clear benefit to wild rice. Please consider the future of my family and the Iron Range.

Sincerely,

(Name)

Randy Cozine

(Address)

26283 County Road 62
Cohasset MN 55721

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

RECEIVED
17 OCT 20 AM 9:02
ADMINISTRATIVE
HEARINGS

RE: Docket 80-90030-34519

To whom it may concern:

I am a dedicated employee of Cleveland Cliffs, which employs over 1,700 people in Northeastern Minnesota, and am writing with concerns about the state's proposed sulfate water quality standard.

In 1973, the MPCA enacted a wild rice sulfate standard based on research from the 1940s with the goal of protecting wild rice. Today – nearly 45 years later – new research that applied modern experimental and analytical techniques has shown that sulfate in and of itself is not harmful to wild rice. Instead, the MPCA suggests that sulfide may have an effect on wild rice. However, instead of using this knowledge to conduct further research to understand how and to what extent sulfide may impact wild rice growth, the MPCA has moved forward with a draft wild rice sulfate standard based on an inaccurate equation to derive a sulfate water quality standard. This rule could financially devastate my community and has not been proven to protect wild rice.

I believe wild rice is an important crop, and I want to maintain its vitality. However, this proposed standard does not appear to accomplish that goal. At a March 2017 meeting in Northeast Minnesota, an MPCA official was asked if the new standard and the investments made to comply with the standard would result in more abundant rice. The MPCA official said that based on the research there may be no benefit to the wild rice species. In fact, according to the Minnesota Cultivated Wild Rice Council, the crop is currently plentiful and our state is one of the world's largest producers of cultivated wild rice, producing 5-10 million pounds annually. Nonetheless, the MPCA is moving forward with this misguided standard.

According to the MPCA, the only viable treatment option to meet the proposed standard is reverse osmosis. Reverse osmosis is costly to install and maintain. If the standard is implemented, many businesses, communities, and families will have to cover the cost. I understand it may increase household sewer and water bills in some communities by nearly five times the current cost. This cost is burdensome and unacceptable given that the proposed standard has not been scientifically proven to protect wild rice.

Our strongest industry in Northeast Minnesota is iron ore mining. For more than 130 years, this industry has worked in collaboration with many of our communities to build and grow the region. The proposed rule is predicted to cost over \$1 billion in water treatment costs, a large portion of which would be borne by taconite mines. This is an investment that could alternatively be made to advance job growth and innovative new projects that will bring the industry to a brighter future. This cost could affect the mines' ability to stay open, and in turn, could affect my job and the health of my community.

The Minnesota State Legislature is aware of these costs and granted the MPCA an extension on publishing the standard in order to complete an economic impact analysis. Instead, the agency chose to publish the rule before completing the study that would inform regulated entities the true cost of implementing the rule.

For these reasons, I respectfully ask the Administrative Law Judge to return the MPCA's proposed rule; ask the agency to incorporate available sulfide science that applies good research practices and adopt the recommendations by the highly-respected scientific research firm, Ramboll ENVIRON. MPCA's adoption of their findings will reduce the error rate of the sulfate equation to 4% and address scientific shortcomings identified by Fort Environmental Labs (FEL) and MPCA's peer review panel. The two Ramboll ENVIRON recommendations are:

- a. To increase the toxic sulfide threshold based on evidence from the MPCA and FEL research, and
- b. To adjust the waterbodies included in the dataset used to develop the equation to only include those that are recommended as draft wild rice waters.

Your consideration of these two recommendations will improve the proposed rule and ensure longevity for the iron ore mines of Minnesota which help me provide for my family.

Sincerely,



Tracy Campbell
312 N. W. 2nd Avenue
Chisholm, Mn. 55719



RECEIVED

17 OCT 20 AM 9:02

Dear USW Member,

The Minnesota Pollution Control Agency has proposed a wild rice sulfate standard that could have significant implications for Cleveland Cliffs' operations, if approved into law.

The standard is currently in the rule-making phase, which means you have the ability to take action by submitting a comment to the Office of Administrative Hearings. Below you will find more details about the proposed rule, why it's unacceptable in its current form and how it could impact Iron Range mines and communities.

- It is uncertain if wild rice will be more abundant if the proposed rule is implemented. In a March meeting in northeastern Minnesota, an MPCA official was asked if the new standard and the investments made to comply with the standard would result in more abundant rice. The MPCA official said that based on the research there may be no benefit to the wild rice species.
- There is only one real treatment option. Reverse osmosis is the only treatment solution currently available to comply with the proposed rule. Reverse osmosis systems are costly to install and operate.
- There are dramatic costs to local communities, households, and businesses. Indianapolis complied with new wastewater treatment standards by installing a reverse osmosis system in their wastewater treatment system. This installation resulted in a water bill increase of \$160/month/home.

MPCA must adopt the recommendations by the highly-respected scientific firm, Ramboll ENVIRON, to reduce the error rate of the sulfate equation to 4% and to address scientific shortcomings identified by Fort Environmental Labs (FEL) and MPCA's peer review panel. The two recommendations are:

- To increase the toxic sulfide threshold based on evidence from the MPCA and FEL research, and
- To adjust the waterbodies included in the dataset used to develop the equation to only include those that are recommended as draft wild rice waters.

There are several form letters available on this topic, but we ask that you either sign this one, which is specific to Cleveland Cliffs or type your own letter stating your opposition to the state's proposed wild rice sulfate rule and urge the MPCA to adopt the recommendations of Ramboll ENVIRON. There are three ways to submit comments:

- **Online** (you will need to sign in) at <https://minnesotaoah.granicusideas.com/discussions>
- **Mail** to the Office of Administrative Hearings, P.O. Box 64620, Saint Paul, MN 55164-0620 (Docket 80-90030-34519). There are also stamped envelopes available in the Administration Building lobby or at the Local 2705 Union Hall.
- **Deliver** in person to the Office of Administrative Hearings (600 N Robert Street, Saint Paul)

The deadline to submit comments is **November 9, 2017**. If you have any questions, please contact Julie Lucas at 218-262-6856 or Sandy Karnowski at 218-262-7966.

Frank Jenko-President USW Local 2705



RECEIVED
17 OCT 20 AM 9:01

ADMINISTRATIVE
HEARINGS

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Office of Administrative Hearings
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Saint Paul, MN 55164-0620

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17 OCT 20 AM 8:55
ADMINISTRATIVE
HEARINGS

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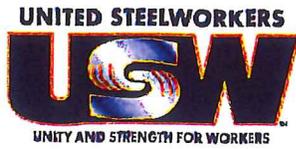
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Sincerely,



Print Name: Denine Ketelboeter
Address: 1201 Wenton Drive
City, state, zip code: Chisholm, MN 55719



RECEIVED
17 OCT 20 AM 8:55
ADMINISTRATIVE
HEARINGS

Mail to:

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Date:

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Sincerely,

(Name)

VICKIE MARTINSON

(Address)

113 NEW YORK AVE E
GILBERT MN
55741



RECEIVED
17 OCT 20 AM 8:34
ADMINISTRATIVE
HEARINGS

Mail to:

Office of Administrative Hearings
P.O. Box 64620
Saint Paul, MN 55164-0620

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Sincerely,

(Name)

Scott Sandstrom

(Address)

618 A Ave
Eveleth, MN 55734