

Comment Letter 1

From: Bobbi Jo Amic [bamic@LendSmartMortgage.com]
Sent: Thursday, April 08, 2010 1:21 PM
To: Review, Environmental (DNR)
Subject: Essar Steel

- 1a Essar Steel MN is a \$1.6 billion investment that will generate up to 2000 construction and 500 full time permanent jobs. Essar has all the necessary environmental approvals and permits to construct facilities in support of up to 4.1 million tons per annum standard pellets, 2.8 mtpa DRI pellets and 2.5 mtpa steel. The prior environmental review and permitting process included completion of a very comprehensive joint Federal and State environmental impact statement.
- 1b Essar continues to invest significant time and resources toward construction and completing the development of detailed plans to mine taconite, process ore into pellets and produce direct-reduced iron and steel, while also finding ways to generate cost savings and achieve additional environmental improvements to the project. Essar recently proposed modifications to its project to increase pellet production from the 4.1 mtpa originally permitted to 6.5 mtpa so the company can provide pellets for Essar Steel Alfoma in addition to supplying its on site steel making needs. Essar will essentially mine the same ore currently permitted but in 15 years instead of 20. The pellet capacity increase will not change plans to produce direct reduced iron pellets or steel at currently permitted levels.
- 1c Essar Design Environmental Benefits: no additional wetlands impact, reduction in fugitive dust emissions from mine haul roads, reductions in mercury and nitrogen oxides emissions, commitment to existing environmental protection, such as, best available control tech for air emissions, no discharge of surface water and no additional water supply needed, integrated pellet and steel making to reduce fuel needs and related emissions.
- 1d We are requesting that the DNR and MPCA follow the Supplemental Environmental Impact Statement rules while also ensuring that the environmental regulatory process moves forward in a timely and cost effective manner.

Sincerely, and respectfully submitted,

Bobbi Jo Amic

Be Smart. Choose LendSmart.

Bobbi Jo Amic

Sr. Loan Officer

2204 First Ave
 Hibbing, MN 55746
 (218)262-5885
 (218)262-5884 (fax)
 (218)966-7218 (cell)

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Comment Letter 2

From: Gloria Anderson [ganderso@comolp.com]
Sent: Thursday, April 08, 2010 10:39 AM
To: Review, Environmental (DNR)

Attention: Bill Johnson
Division of Ecological Services Box 25
MN Department of Natural Resources
500 Lafayette Road
St. Paul MN 55155

Dear Mr. Johnson:

2a Please give your support to the Essar Steel Minnesota project.

Sincerely,

Gloria E. Anderson

Gloria E. Anderson
C.S.R.
COMO OIL & PROPANE
TWO HARBORS MN 55616

burns_041010.txt

From: Ernie Burns [brandy769@mchsi.com]
Sent: Saturday, April 10, 2010 6:20 AM
To: Review, Environmental (DNR)
Subject: Essar Steel Minnesota support

Bill Johnson
Division of Ecological Services, Box 25
MN Department of Natural Resources
500 Lafayette Road
St. Paul, MN 55155
Fax: 651-297-1500

3a Essar Steel Minnesota is a \$1.6 billion investment that will generate up to 2000 construction and 500 full-time permanent jobs. Essar has all of the necessary environmental approvals and permits to construct facilities in support of up to 4.1 million tons per annum (mtpa) standard pellets, 2.8 mtpa DRI pellets and 2.5 mtpa steel. The prior environmental review and permitting process included completion of a very comprehensive joint Federal and State environmental impact statement.

3b Essar continues to invest significant time and resources toward construction and completing the development of detailed plans to mine taconite, process ore into pellets and produce direct-reduced iron (DRI) and steel, while also finding ways to generate cost savings and achieve additional environmental improvements to the project. As you know, Essar recently proposed modifications to it's project to increase pellet production from the 4.1 mtpa originally permitted to 6.5 mtpa so the company can provide pellets for Essar Steel Algoma in addition to supplying it's on-site steel making needs. Essar will essentially mine the same ore currently permitted but in 15 years instead of 20. The pellet capacity increase will not change plans to produce direct reduced iron pellets or steel at currently permitted levels.

3c Essar Design Environmental Benefits, to name a few:
Detailed engineering for the proposed increase in pellet making allows the increase in pellet capacity to occur while simultaneously maintaining or improving the significant environmental aspects of the project. Specific examples include:
* No additional wetlands impacts
* Reduction in fugitive dust emissions from mine haul roads
* Reductions in mercury and nitrogen oxides (NOx) emissions
* Commitment to existing environmental protection, including; o Best available control technology for air emissions o Zero discharge to surface water and no additional water supply needed o Integrated pellet and steel making to reduce fuel needs and related emissions
3d * We are requesting that the DNR and MPCA follow the Supplement Environmental Impact Statement rules while also ensuring that the environmental regulatory process moves forward in a timely and cost effective manner.
Sincerely and respectfully submitted,
Ernest & Kathleen Burns

TCS TV & Video, Inc.
Nashwauk, MN 55769



Virginia, Eveleth, Mt. Iron, Gilbert and surrounding business communities
403 First Street North
Virginia, MN 55792
(218) 741-2717 (218) 749-4913 Fax

April 12, 2010

Bill Johnson
Division of Ecological Services, Box 25
MN Dept. of Natural Resources
500 Lafayette Road
St. Paul, MN 55155

Dear Mr. Johnson:

- 4a I am sharing with you the Laurentian Chamber's support of the Essar Steel project and our optimism for its continued timely advancement.
- 4b This project will provide regional economic growth and new opportunities for working families, and will have a positive effect on northeastern Minnesota for years to come.
- 4c Your support of this project will help ensure economic growth and sustain a strong, diversified workforce throughout the Iron Range and our surrounding business communities.

Respectfully,

Jim Currie
President
Laurentian Chamber of Commerce

Comment Letter 5

From: Lory Fedo [lfedo@hibbing.org]
Sent: Thursday, April 08, 2010 11:27 AM
To: Review, Environmental (DNR)
Subject: essar project modification comment

Dear Mr. Johnson;

- 5a The Hibbing Area Chamber of Commerce has supported the Essar Steel project since it's inception. The jobs and industry are badly needed in our region and the impact will change and improve the lives of many. Our unemployment in the region soared well above the rest of the state last year.
- 5b Our chamber has worked with the company and become familiar with it's people and many of the employees. They are hardworking, dedicated individuals who are doing their best to meet all the environment requirements and standards. The permit modifications they are requesting are not unreasonable and in my view are barely significant. The time that this process has taken has become burdensome. While I understand that it needs to be
- 5c done, the state should tighten up the amount of time it takes to complete the process.
- 5d We are requesting that the DNR and MPCA follow the Supplemental Environmental Impact Statement rules while also ensuring that the environmental regulatory process moves forward in a timely and cost effective manner.

Thank you for your time and the opportunity to comment.

Lory Fedo
President, CEO
Hibbing Area Chamber of Commerce
lfedo@hibbing.org
218-262-3895
218- 969-9740
Be Hibbings friend on facebook
www.facebook.com/hibbing.chamber

Comment Letter 6

From: Fox, Jeanine A [JFO2@amfam.com]
Sent: Friday, April 09, 2010 9:41 AM
To: Review, Environmental (DNR)
Cc: Fox, Neal A
Subject: ESSAR PROJECT

:TO WHOM IT MAY CONCERN

6a Essar Steel Minnesota is a \$1.6 billion investment that will generate up to 2000 construction and 500 full-time permanent jobs. Essar has all of the necessary environmental approvals and permits to construct facilities in support of up to 4.1 million tons per annum (mtpa) standard pellets, 2.8 mtpa DRI pellets and 2.5 mtpa steel. The prior environmental review and permitting process included completion of a very comprehensive joint Federal and State environmental impact statement.

6b Essar continues to invest significant time and resources toward construction and completing the development of detailed plans to mine taconite, process ore into pellets and produce direct-reduced iron (DRI) and steel, while also finding ways to generate cost savings and achieve additional environmental improvements to the project. As you know, Essar recently proposed modifications to it's project to increase pellet production from the 4.1 mtpa originally permitted to 6.5 mtpa so the company can provide pellets for Essar Steel Algoma in addition to supplying it's on-site steel making needs. Essar will essentially mine the same ore currently permitted but in 15 years instead of 20. The pellet capacity increase will not change plans to produce direct reduced iron pellets or steel at currently permitted levels.

6c Essar Design Environmental Benefits, to name a few:

Detailed engineering for the proposed increase in pellet making allows the increase in pellet capacity to occur while simultaneously maintaining or improving the significant environmental aspects of the project. Specific examples include:

" No additional wetlands impacts

" Reduction in fugitive dust emissions from mine haul roads

" Reductions in mercury and nitrogen oxides (NOx) emissions

" Commitment to existing environmental protection, including;

o Best available control technology for air emissions

o Zero discharge to surface water and no additional water supply needed

o Integrated pellet and steel making to reduce fuel needs and related emissions

"

6d We are requesting that the DNR and MPCA follow the Supplement Environmental Impact Statement rules while also ensuring that the environmental regulatory process moves forward in a timely and cost effective manner.

Sincerely and respectfully submitted,

JEANINE FOX

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From: Carole Girard [cgirard@woods2water.com]
Sent: Monday, April 12, 2010 7:56 AM
To: Review, Environmental (DNR)
Cc: Karen Lindquist; Tammie Sumner; Lory Fedo; Ron Smith
Subject: Essar Steel Minnesota

Bill Johnson
 Division of Ecological Services, Box 25
 MN Department of Natural Resources

Dear Mr. Johnson:

7a This letter is sent to you to remind you that the people of the Range are extremely anxious for Essar Steel Minnesota to start their operation. The economic impact that Essar Steel Minnesota will bring to our area will guarantee the retention of our younger population to remain in the area and promote education to fulfill those job requirements. The number of direct jobs is stated below but furthermore, this project is said to create over 1000 job in conjunction with the added family that will establish themselves in the area. More business, more people... a great economic boom that we need desperately.

7b Essar Steel Minnesota is a \$1.6 billion investment that will generate up to 2000 construction and 500 full-time permanent jobs. Essar has all of the necessary environmental approvals and permits to construct facilities in support of up to 4.1 million tons per annum (mtpa) standard pellets, 2.8 mtpa DRI pellets and 2.5 mtpa steel. The prior environmental review and permitting process included completion of a very comprehensive joint Federal and State environmental impact statement.

7c Essar continues to invest significant time and resources toward construction and completing the development of detailed plans to mine taconite, process ore into pellets and produce direct-reduced iron (DRI) and steel, while also finding ways to generate cost savings and achieve additional environmental improvements to the project. As you know, Essar recently proposed modifications to it's project to increase pellet production from the 4.1 mtpa originally permitted to 6.5 mtpa so the company can provide pellets for Essar Steel Algoma in addition to supplying it's on-site steel making needs. Essar will essentially mine the same ore currently permitted but in 15 years instead of 20. The pellet capacity increase will not change plans to produce direct reduced iron pellets or steel at currently permitted levels.

7d **Essar Design Environmental Benefits, to name a few:**

Detailed engineering for the proposed increase in pellet making allows the increase in pellet capacity to occur while simultaneously maintaining or improving the significant environmental aspects of the project. Specific examples include:

- No additional wetlands impacts
- Reduction in fugitive dust emissions from mine haul roads
- Reductions in mercury and nitrogen oxides (NOx) emissions
- Commitment to existing environmental protection, including;
 - Best available control technology for air emissions
 - Zero discharge to surface water and no additional water supply needed
 - Integrated pellet and steel making to reduce fuel needs and related emissions

7e ● We are requesting that the DNR and MPCA follow the Supplement

Environmental Impact Statement rules while also ensuring that the environmental regulatory process moves forward in a timely and cost effective manner as I support this project.

Yours very truly,

Carole Girard, Owner/Broker

RE/MAX Woods to Water

832 First Street, Suite 120

Nashwauk, MN 55769

Tel: (218) 885.3465

Toll Free: (877) 885-3465

Cell: (218) 259.6600

Email: cgirard@woods2water.com

Web site: www.woods2water.com

Comment Letter 8

From: Jerry Greene [jgreene59@msn.com]
Sent: Sunday, April 11, 2010 8:10 AM
To: Review, Environmental (DNR)
Subject: Support for essar steel plant

Jerry Greene(owner)

Greene**C**oncrete**BASEMENT SOLUTIONS!**

(218)326-2057

Grand Rapids,Mn

Greeneconcrete.com

8a Essar Steel Minnesota is a \$1.6 billion investment that will generate up to 2000 construction and 500 full-time permanent jobs. Essar has all of the necessary environmental approvals and permits to construct facilities in support of up to 4.1 million tons per annum (mtpa) standard pellets, 2.8 mtpa DRI pellets and 2.5 mtpa steel. The prior environmental review and permitting process included completion of a very comprehensive joint Federal and State environmental impact statement.

8b Essar continues to invest significant time and resources toward construction and completing the development of detailed plans to mine taconite, process ore into pellets and produce direct-reduced iron (DRI) and steel, while also finding ways to generate cost savings and achieve additional environmental improvements to the project. As you know, Essar recently proposed modifications to it's project to increase pellet production from the 4.1 mtpa originally permitted to 6.5 mtpa so the company can provide pellets for Essar Steel Algoma in addition to supplying it's on-site steel making needs. Essar will essentially mine the same ore currently permitted but in 15 years instead of 20. The pellet capacity increase will not change plans to produce direct reduced iron pellets or steel at currently permitted levels.

8c **Essar Design Environmental Benefits, to name a few:**

Detailed engineering for the proposed increase in pellet making allows the increase in pellet capacity to occur while simultaneously maintaining or improving the significant environmental aspects of the project. Specific examples include:

- No additional wetlands impacts
- Reduction in fugitive dust emissions from mine haul roads
- Reductions in mercury and nitrogen oxides (NOx) emissions
- Commitment to existing environmental protection, including;
 - Best available control technology for air emissions
 - Zero discharge to surface water and no additional water supply needed
 - Integrated pellet and steel making to reduce fuel needs and related emissions

8d ● We are requesting that the DNR and MPCA follow the Supplement Environmental Impact Statement rules while also ensuring that the environmental regulatory process moves forward in a timely and cost effective manner.

Sincerely and respectfully submitted
 Jerry Greene

Comment Letter 9

From: John Heino [jheino@comolp.com]
Sent: Thursday, April 08, 2010 4:49 PM
To: Review, Environmental (DNR)
Subject: Essar Steel Supplemental Environmental Impact Statement

April 8, 2010

Bill Johnson
Division of Ecological Services, Box 25
MN Department of Natural Resources
500 Lafayette Road
St. Paul, MN 55155

Dear Mr. Johnson:

- 9a I am writing to support the Essar Steel project and to urge an effective and timely review of the Supplemental Environmental Impact Statement.
- 9b Essar Steel will generate as many as 2000 construction and 500 full-time permanent jobs at a time when our region and state are sorely in need of momentum to restart our recession-weakened economy. Considering the thorough work that has already been done on the state and federal environmental review and permitting processes for the project as originally proposed, I hope you can help expedite the supplemental review to allow the expanded project to move forward as quickly as possible.
- 9c As a lifelong resident of the region, I am fully supportive of responsible environmental regulation to protect our resources. I hope you'll agree that the DNR and PCA can fulfill their regulatory responsibilities and still be responsive to ensure timely reviews when major investments and job creation are at stake. Sound, yet efficient, regulatory review can certainly help differentiate Minnesota and give us an edge when companies are considering where to create jobs.

Thank you for your consideration.

Best regards,
John Heino
President & CEO
Como Oil & Propane
4330 W. 1st St., Suite A
Duluth, MN 55807

Comment Letter 10

From: Todd & Janet [tjaranson@northlc.com]
Sent: Sunday, April 11, 2010 9:45 PM
To: Review, Environmental (DNR)
Subject: Essar Steel

Dear Mr. Bill Johnson,

Following are our written comments regarding the SEIS for the Essar project in Nashwauk.

10a

We live within the Project Boundary. The initial EIS minimally addressed our situation in Sections 6.1.3 and 6.14. We note that the scope of the SEIS includes, among issues to be addressed, Socioeconomic effects. As stated in the SEIS Preparation Notice, Minnesota Rules Part 4410.3000 provides that the scope of the SEIS is to include impacts and mitigation measures inadequately addressed in the EIS. In light of the additional effects that the proposed increase in pellet production would have on our family and our home, and as the Mitigation Measures set out in Section 6.1.3 can now be seen to be clearly inadequate (as Essar has not followed through on the acquisition process, which has no timelines or procedures described in the EIS), the SEIS would not be complete unless Section 6.1.3 is more fully addressed. We ask that the SEIS include an update and modification of Section 6.1.3 of the EIS to prescribe procedures and a timeline under which Essar is to negotiate acquisition of the homes within the Project Boundary. No further permits should be granted until Essar has addressed this issue and proceeded in good faith to complete the process in a reasonable time.

**Todd and Janet Jaranson
31461 Hwy 169
Pengilly, MN 55775**

218-259-5417



April 12, 2010

Bill Johnson
Division of Ecological Services, Box 25
MN Department of Natural Resources
500 Lafayette Road
St. Paul, MN 55155

To Whom It May Concern,

- 11a Essar Steel Minnesota is a \$1.6 billion investment that will generate up to 2000 construction and 500 full-time permanent jobs. Essar has all of the necessary environmental approvals and permits to construct facilities in support of up to 4.1 million tons per annum (mtpa) standard pellets, 2.8 mtpa DRI pellets and 2.5 mtpa steel. The prior environmental review and permitting process included completion of a very comprehensive joint Federal and State environmental impact statement.
- 11b Essar continues to invest significant time and resources toward construction and completing the development of detailed plans to mine taconite, process ore into pellets and produce direct-reduced iron (DRI) and steel, while also finding ways to generate cost savings and achieve additional environmental improvements to the project. As you know, Essar recently proposed modifications to its project to increase pellet production from the 4.1 mtpa originally permitted to 6.5 mtpa so the company can provide pellets for Essar Steel Algoma in addition to supplying it's on-site steel making needs. Essar will essentially mine the same ore currently permitted but in 15 years instead of 20. The pellet capacity increase will not change plans to produce direct reduced iron pellets or steel at currently permitted levels.
- 11c *Essar Design Environmental Benefits, to name a few:*
- Detailed engineering for the proposed increase in pellet making allows the increase in pellet capacity to occur while simultaneously maintaining or improving the significant environmental aspects of the project. Specific examples include:
- No additional wetlands impacts
 - Reduction in fugitive dust emissions from mine haul roads
 - Reductions in mercury and nitrogen oxides (NO_x) emissions
 - Commitment to existing environmental protection, including:
 - Best available control technology for air emissions
 - Zero discharge to surface water and no additional water supply needed
 - Integrated pellet and steel making to reduce fuel needs and related emissions
- 11d • We are requesting that the DNR and MPCA follow the Supplement Environmental Impact Statement rules while also ensuring that the environmental regulatory process moves forward in a timely and cost effective manner.

Sincerely,



Tim Johnson
GABA Community Liaison

Comment Letter 12

From: Licari, Reggie [reggie.licari@ameripride.com]
Sent: Friday, April 09, 2010 3:36 PM
To: Review, Environmental (DNR)
Cc: Lory Fedo
Subject: Essar Steel Supplemental EIS

Dear Mr. Johnson,

- 12a I am writing to you to pledge my support for the approval of Essar Steel's Supplemental Environmental Impact Statement for the proposed modifications to the Essar Steel Minnesota project.
- 12b As you know, the Essar Steel Minnesota project will provide a much needed economic boost to our area. In addition to the 2,000 construction jobs, this project will generate 500 permanent jobs plus many spin off jobs. For an area that has been hit hard by economic declines, this is a very welcomed project. As important as the additional jobs are for our area, it equally important that our environment is protected as well.
- 12c Essar Steel has already completed a prior environmental review and permitting process that included completion of a very comprehensive joint Federal and State EIS. Essar continues to invest significant time and resources toward
- 12d construction and completing the development of detailed plans to mine taconite, process ore into pellets and produce direct-reduced iron (DRI) and steel, while also finding ways to generate cost savings and achieve additional environmental improvements to the project. Essar recently proposed modifications to it's project to increase pellet production from the 4.1 mtpa originally permitted to 6.5 mtpa so the company can provide pellets for Essar Steel Algoma location in addition to supplying it's on-site steel making needs. Essar will essentially mine the same ore currently permitted but in 15 years instead of 20. Detailed
- 12e engineering for the proposed increase in pellet making allows the increase in pellet capacity to occur while simultaneously maintaining or improving the significant environmental aspects of the project. Examples include:
- No additional wetlands impact
 - Reduction in fugitive dust emissions from mine haul roads
 - Reduction in mercury and nitrogen oxides (NOx) emissions
 - Commitment to existing environmental protection, including:
 - Best available control technology for air emissions

- Zero discharge to surface water and no additional water supply needed
- Integrated pellet and steel making to reduce fuel needs and related emissions

12f As you can see, Essar Steel is being a responsible environmental steward, which is very important to all of us in NE Minnesota. We are asking that the DNR and MPCA follow the Supplemental Environmental Impact Statement rules and approve Essar's request. I congratulate all of you for making sure Essar and all mining companies adhere to our environmental rules and regulations. Working together, we can come to common solutions that will benefit all concerned. Thank you for your time.

Reggie J. Licari
General Manager
AmeriPride Linen & Apparel Services
519 E. 19th Street
Hibbing, MN 55746
218-263-3611
218-263-3822 Fax
218-969-2197 Cell

Comment Letter 13

From: Larry Majewski [ljmajewski@frontiernet.net]
Sent: Sunday, April 11, 2010 7:23 AM
To: Review, Environmental (DNR)
Subject: Essar Steel Environmental Supplement

Mr. Bill Johnson:

- 13a I am writing this letter of recommendation for the Environmental Supplement Rules for the Essar Steel Project. It appears to me that the changes of production level and use of larger trucks and use of predesigned furnace expansion will make the operation more efficient while having less impact on the environment.
- 13b This project is very important to the areas economy while the design is protecting the natural resources we all use and enjoy. Not impacting more wetlands and reducing the dust emissions for hauling will be a benefit. A new plant will be using the best available control technology for air emissions and not use any more water supply then originally planned.
I believe this is a win,win for the economy and the environment.

Respectfully submitted,

Larry Majewski
Fred's IGA Nashwauk
Nashwauk Chamber of Commerce Member
NPUC Member



Minnesota Center for Environmental Advocacy

The legal and scientific voice protecting and defending Minnesota's environment

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www.mncenter.org

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April 12, 2010

BY ELECTRONIC AND U.S. MAIL

Bill Johnson
Minnesota Department of Natural Resources
Division of Ecological Services
Box 25, 500 Lafayette Rd.
St. Paul MN 55155

Re: Comments on Scope of SEIS for Essar Steel Minnesota Modifications Project

Dear Mr. Johnson,

These comments are submitted on behalf of the Minnesota Center for Environmental Advocacy ("MCEA") regarding the scope of the supplemental Environmental Impact Statement ("SEIS") for the Essar Steel Minnesota Modifications Project at its Nashwauk facility ("Essar Steel Project"). MCEA is a Minnesota nonprofit environmental organization whose mission is to use law, science, and research to preserve and protect Minnesota's natural resources, wildlife, and the health of its people. MCEA has state-wide membership. The Essar Steel Project involves environmental impacts in many of the areas of MCEA's work, including water quality, natural resources, public health, and energy. Thank you for the opportunity to offer comments on the scope of the SEIS for the Project.

These comments on the scope of the SEIS for the Essar Steel Project are submitted to identify potentially significant issues relevant to the proposed Project, and help to define the form, level of detail, content, and alternatives which should be analyzed in the Essar Steel Project SEIS as directed by Minnesota Rules 4410.2100.

I. Proposed Change in Life of Project

14b The Essar Steel Project SEIS notice states that the life of the project will be 15 rather than 20 years. No justification is provided for the change from a 20-year to a 15-year project. Without further explanation and an independent justification for this change, it appears that it may be intended to avoid analysis of significant increases in real-time pollution resulting from the facility. The Minnesota Department of Natural Resources ("DNR") should request and obtain objective evidence showing the intent of the Essar Steel Project. What, for example, have Essar Steel's investors been told about the life of the project? Without further information and justification, the shortening of the life of the project and the limitation that places on the environmental analysis are arbitrary and capricious, and will render the SEIS inadequate.

14c

14d Essar Steel's decision to make a considerable investment in a larger pellet furnace is consistent
with a plan to continue mining beyond the initial 15 years of the Essar Steel Project under
14e consideration in the SEIS. The likelihood that mining and processing could continue beyond the
initial 15 year period must be disclosed. Environmental impacts associated with mining and
14f processing beyond 15 years must be analyzed as a reasonably foreseeable outcome of the
investment in a larger pellet furnace. Essar Steel cannot avoid environmental review of its
increased production by condensing the mine plan under review to 15 years if its ultimate intent
is to continue mining beyond that time period. The first EIS was based on a 20 year mine plan.
If Essar Steel intends to continue mining at this site for 20 years, then that should be disclosed
and analyzed as part of this environmental review process.

II. Air Quality

A. Compliance with new regulatory requirements

14g The SEIS for the Essar Steel Project should explain whether and how the many proposed
changes in the federal Clean Air Act regulations, which are in the process of being finalized and
will go into effect during the life of the Project, will affect the Essar Steel Project. The U.S.
Environmental Protection Agency ("EPA") is currently in the process of revising and finalizing
several regulatory changes in the National Ambient Air Quality Standards ("NAAQS") and is in
the process of establishing greenhouse gas emissions regulations. For example, the following
regulatory changes are expected to go into effect during the life of the Project:

- New 1-hour Nitrogen Dioxide (NO₂) NAAQS
- GHG Tailoring Rule
- PM_{2.5} PSD increment rule
- SO₂ NAAQS Review
- Ozone NAAQS Reconsideration
- Repeal of PM₁₀ Surrogacy
- CAIR Replacement Rule
- PM_{2.5} NAAQS Reconsideration
- Secondary SO₂ and NO_x NAAQS

14h Under the revised NAAQS, Minnesota is projected to have areas of nonattainment for several air
quality parameters. If areas of Minnesota will be in nonattainment under the revised NAAQS, an
incremental analysis through the Prevention for Significant Deterioration ("PSD") would no
longer be appropriate to a review of new emissions such as those associated with the Essar Steel
Project. The Essar Steel Project SEIS and any subsequent permitting for the Project should
evaluate potential air quality impacts from the Project through a non-attainment standard.

B. Regional Haze

14i In addition to the issues identified in the SEIS Preparation Notice, dated March 19, 2010, the
Essar Steel Project SEIS should include information regarding how emissions from the Project

were accounted for and analyzed in the Regional Haze SIP, including the relationship of the increased emissions from the Project to the reasonable progress goals contained in the Haze SIP and the emissions budget for the NE Minnesota Plan. The Essar Steel Project SEIS should also analyze how the projected emissions from the Essar Steel Project were evaluated in the context of anticipated new sources included in the emissions modeling conducted for the Haze SIP.

14j Additionally, the SEIS should include an explanation of the monitoring which will be required for the new pellet furnace proposed for the Essar Steel Project, evaluate the installation of Continuous Emissions Monitors ("CEMS") on the new pellet furnace, and indicate if CEMS will be required in permitting of the new pellet furnace. The SEIS must provide an explanation and supporting analysis if the installation of CEMS as a required monitoring tool is not recommended in light of the monitoring requirements included for other taconite facilities in the Haze SIP.

C. SEIS should include Analysis of Environmental Impacts from PM_{2.5} Emissions

14k The SEIS Project Preparation Notice indicates that the Essar Steel Project SEIS will include modeling of PM₁₀ to assess air quality related values such as visibility and acid deposition in affected Class I areas (Voyageurs National Park, Boundary Waters Canoe Area Wilderness, Isle Royale National Park, and Rainbow Lakes Wilderness Area). The Essar Steel Project SEIS should include an analysis of the impact on air quality values from PM_{2.5} in addition to PM₁₀. Different environmental impacts are associated with PM_{2.5} and PM₁₀. The SEIS should include an analysis and recognition of these differences. The Minnesota Haze SIP which was submitted to EPA in December 2009 indicates that point sources in Minnesota are required to provide an annual point source emission inventory which includes emissions of PM_{2.5} in addition to PM₁₀. The SEIS for the Project should include modeling and analysis of the Project's PM_{2.5} emissions to assess the direct and indirect impacts and cumulative potential effects on air quality as a result of the Project's emissions of PM_{2.5}. Including this analysis is particularly important in light of the EPA's repeal of the PM₁₀ surrogacy rule and implementation of the New Source Review ("NSR") Program for Particulate Matter Less Than 2.5 Micrometers (PM_{2.5}); Notice of Proposed Rulemaking To Repeal Grandfathering Provision and End the PM₁₀ Surrogate Policy, which would end the use of PM₁₀ as a surrogate for PM_{2.5} in air permits issued by Minnesota.

D. Electricity Needs of Project

14l In analyzing the environmental impacts associated with the generation of purchased electricity required for the Essar Steel Project, the SEIS should determine if new electricity generation is a likely foreseeable consequence of the Project. Even if new generation (as in constructing new power sources) isn't likely, the SEIS must account for the emissions associated with the electricity generation from existing units that would not happen but for the consumption of electricity by the Essar Steel Project.

14n The SEIS should analyze the environmental impacts associated with the electricity generation and related electricity consumption for the entire project, not just the increased electricity

demands associated with the increased production of the Project. When it prepared the original EIS for the project, the DNR erroneously concluded that the consumption of electricity by the project would not lead to the generation of additional electricity at existing units because there was sufficient load already "on the grid." The issue is not whether there is sufficient existing capacity to generate electricity for the Essar Steel Project (original or expanded); rather, the issue is that the Essar Steel Project will result, directly and indirectly, in the actual generation of electricity to supply Essar Steel. The generation of electricity to meet the needs of the Essar Steel Project results in environmental impacts which must be disclosed in the SEIS. Likewise, alternatives (e.g., site-based generation, renewable alternatives) and mitigations (e.g., offsets) must be considered.

14o In conducting this analysis, the SEIS should analyze not only the Greenhouse Gas Emissions ("GHG") associated with the generation of purchased electricity, but should also include an analysis of all air emissions associated with the generation of electricity needed to serve the Project, including SO₂, NO_x, PM_{2.5}, PM₁₀, mercury, and other pollutants.

14p In analyzing the electricity needs of the Essar Steel Project, the SEIS should also include an alternatives analysis for the electricity generation required for the entire Project, including a direct and indirect impacts analysis and a cumulative potential effects analysis for wind, natural gas, and biomass.

E. Air emissions from increased mobile sources

14q The SEIS for the Essar Steel Project should analyze the direct and indirect impacts and cumulative potential effects associated with air emissions from increased mobile sources associated with the increased pellet production of the Project and the transportation of these pellets to supply operations at Algoma Steel in Ontario, Canada or other Essar Steel Holdings, Ltd. ("ESHL") operations. Environmental impacts from mobile source air emissions include, but
14r are not limited to increased haze and visibility impairment in Class I Areas and contribution to climate change from greenhouse gas emissions.

F. Mercury emissions

14s The SEIS for the Essar Steel Project should also analyze the indirect and direct impacts, and cumulative potential effects associated with mercury emissions from the larger pellet furnace and generation of electricity purchased by the Project. The SEIS for the project should analyze real-time mercury emissions and not limit its analysis of mercury emissions based on the amount of anticipated mercury emissions over the life of the Essar Steel Project in comparison to the total mercury emissions analyzed in the first EIS. This analysis of the environmental impacts from mercury emissions should include an analysis of how the project will fit within the Minnesota Mercury Total Maximum Daily Load ("Mercury TMDL") load allocation. The increased mercury emissions associated with the Essar Steel Project's proposal to install a larger pellet furnace combined with increased mercury emissions associated with the additional electricity demands required by the increased production rates must be assessed when analyzing the

Project's contribution to state-wide mercury emissions and Minnesota's Mercury TMDL load allocation.

14t The proposed increase in pellet production will require the addition of a crusher/concentrator line and the installation of a larger pellet furnace, both of which will lead to an increase in air emissions. The SEIS Preparation Notice indicates that mercury control technology will be installed on the pelletizing furnace. The SEIS should discuss the effectiveness of any mercury control technology installed, what types of monitoring of the control technology will be put in place, alternative mercury control technology, and any mitigation measures which are available in the event that the mercury control technology does not work as effectively as anticipated.

14u In addition, the SEIS should analyze other mitigation measures which might be available to eliminate the effects from any anticipated increases in mercury emissions from the Essar Steel Project to ensure that the Project can operate without jeopardizing the achievement of the significant reductions in mercury emissions demanded by the Mercury TMDL.

III. Water Quantity Issues

14v The Essar Steel Project SEIS Preparation Notice indicates that the SEIS will address the quantity of water: 1) needed to satisfy mining, beneficiation, pellet production, and steelmaking; and 2) to be discharged or transferred between waters of the state. The Notice further states that if additional water required for the Project reviewed in the first EIS is determined to be needed, then the impacts of any changes on surface or groundwater resources and mitigation will be assessed in the SEIS.

14w The SEIS should analyze the water consumption needs for the Project in the context of how much water will be required per day in comparison to the amount of water required per day in the first EIS. In light of the condensed time period and increased output planned for the Project in comparison to that evaluated in the first EIS, there can be little doubt that the Project will require additional water per day than that analyzed in the first EIS. Analyzing the direct and indirect impacts and cumulative potential effects associated with the increased daily water demands of the Project is particularly important when considering the drying effects of a changing climate. The SEIS for the Project must analyze the impacts associated with appropriations of water from Swan Lake and the potential that water might have to be pumped from the Harrison/Hawkins basin due to the increasingly dry conditions. The environmental impacts associated with dryer conditions are not limited to just the amount of water available, but also with the increased concentration of chlorides and other chemicals.

14y In addition to the increased water demands from the Essar Steel Project, the increased production will also carry an associated impact on the "augmentation" plan for Oxhide Creek. The direct, indirect, and cumulative impacts associated with the Project on the "augmentation" plan for Oxhide Creek must be evaluated in the SEIS.

14z The Notice further indicates that water quantity impacts from the Project will be determined by using information from an updated water quantity and water chemistry balance for the Project.

- 14aa The SEIS should expand its assessment of impacts from the Project on water quantity from a reliance on modeling efforts to field studies from other near-by mining operations to ensure that the validity of modeling efforts can be verified in the context of on the ground experience.
- 14bb Additionally, the SEIS should include a critical analysis of the reliability, or lack thereof, of the modeling tools used in the development of the water quantity and water chemistry balance modeling for the Project and the extent to which any unreliability of the modeling used could impact the assessment of environmental impacts of the Project on water quantity and water quality predictions.

IV. Water Quality

- 14cc The SEIS Preparation Notice indicates that the Essar Steel Project SEIS will identify and assess information on the current presence of wild rice in receiving water bodies from the Project and model changes to sulfate concentrations for affected water bodies. The assessment of environmental impacts from increased sulfate levels on wild rice in receiving water bodies should use the wild rice standard of 10 mg/l pursuant to Minn. R. 7050.0220, subp. 3a, A(30). The SEIS should discuss any mitigation measures which may be needed to ensure that the 10 mg/l standard is maintained, and provide specific information regarding any type of water treatment systems which may be required to achieve this standard.
- 14dd The direct and indirect impacts and cumulative potential effects from increased sulfate levels caused by the Project should also include an analysis of the mercury methylation risks associated with the increased sulfate discharges from the Project and any specific water treatment requirements needed to mitigate these impacts.
- 14ee In addition, the SEIS must include an analysis, omitted in the first EIS, of the chemical constituency of water from the tailings basin and its potential effect on water quality in O'Brien Lake and other water resources receiving seepage from the tailings basin.

V. Socioeconomic

- 14ff The analysis of the socioeconomic effects from the Essar Steel Project included in the SEIS should include an analysis and mitigation measures related to the historical boom and bust cycle of the mining industry in Minnesota. As evidenced through the recent economic downturn and the related increase in unemployment in mining communities in Northeastern Minnesota, the communities which are poised to reap the greatest benefits from the Project in terms of employment, local economic development, increased taxes, etc. are also the communities most at risk from economic downturn, unanticipated layoffs, and other unforeseen factors which would create negative socioeconomic impacts from the Project. The SEIS should analyze these impacts as well as the more favorable socioeconomic impacts.

VI. Cumulative Potential Effects Analysis

- 14gg The SEIS for the Essar Steel Project must provide an updated analysis of the cumulative potential effects of the entire Project as a result of the recently revised definition of cumulative

potential effects by the Environmental Quality Board ("EQB"). The new definition for cumulative potential effects is applicable to the state environmental review process. As this definition has changed since the Final Environmental Impact Statement was issued in 2007, this section should be updated to reflect the changes in Minnesota's environmental rules. See Minn. R. 4410.0200, Subp. 11a.

14hh In particular, an updated cumulative potential effects analysis must include an assessment of cumulative potential effects on "the environmentally relevant area that might reasonably be expected to affect the same environmental resources." Minn. R. 4410.0200, Subp. 11a. The Essar Steel Project SEIS should expand the analysis from the first EIS to include wetland impacts in environmentally relevant areas within a larger area of the Mississippi Headwaters. This analysis should include the impact from increased sulfate levels in the affected watershed, fragmentation and cumulative water quality impacts from residential expansion, connected impacts from expanded population, recreational impacts to wetlands, other commercial or industrial development, and expansion of area communities. Additionally, a critical component of any cumulative potential effects analysis must include the effects from climate change on the environmental resources impacted by the Essar Steel Project, including impacts on northern Minnesota's wetland habitats, water quantity and air quality.

VII. Connected Actions

14ii The Essar Steel Project SEIS should analyze the environmental impacts from connected actions including:

- Electricity generation for the Essar Steel Project; and
- The impact on operations at Algoma Steel in Ontario, Canada and other operations of Essar Steel Holdings, Ltd. ("ESHL") as a result of the increased production and/or supply of pellets from the Essar Steel Project.

VIII. Wetland Impacts

14jj While the Army Corps of Engineers ("ACOE") has determined that there will be no additional wetland impacts associated with the Essar Steel Project, MCEA notes that the increased production proposed by the Essar Steel Project and associated increase in water demands to support the increased production may have wetland impacts beyond those analyzed in the first EIS. MCEA maintains that a determination of whether or not the Project will have additional wetland impacts cannot be ascertained until after an updated water quantity analysis has been completed. Additionally, the ACOE conclusion may be subject to reconsideration if the shortened 15-year life of the project turns out to be unjustified. Unless Essar Steel demonstrates that it is making this level of investment solely in anticipation of processing an ore body that will be depleted in 15 years, it is not reasonable to assume that additional mining, and associated wetland impacts, will not result from this project.

IX. Availability of Information for Public Review

14kk

MCEA requests that the DNR make technical and other supporting documents involved in the scoping and development of the Essar Steel Project SEIS available to the public via a web page to ensure that these documents are readily available for public review. Making documents available through a dedicated web page, in addition to providing electronic or hard copies of documents through data practices requests, ensures that the spirit and intent of state environmental laws are met. The purpose of Minnesota's environmental review rules is to aid in providing an understanding of the impact a proposed project will have on the environment "through the preparation and public review of environmental documents." Minn. R. 4410.0300, supb. 3. The rules go further, requiring that government agencies ensure that any material incorporated by reference in an EIS be "reasonably available for inspection by interested persons within the time allowed for comment". Minn. R. 4410.2400. Making background and supporting materials available on a dedicated web page would ensure that these materials were readily available to members of the public interested in commenting on the Essar Steel Project SEIS.

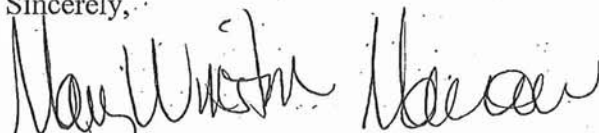
Providing access to documents via a web page has proven very successful with other government agency initiatives regarding environmental matters. For example, the Minnesota Pollution Control Agency ("MPCA") provided access to technical and supporting documents on a web page throughout the development of the Minnesota Regional Haze State Implementation Plan (Haze SIP). The MPCA web page was regularly updated and included not only documents created by the MPCA; but also included documents submitted by other government agencies, public comments, and other relevant technical and supporting documents created as part of the development of the Haze SIP and used to support the conclusions reached in the Haze SIP. (See: <http://www.pca.state.mn.us/air/regionalhaze.html>).

MCEA encourages the DNR to consider this approach during the environmental review process of the Essar Steel Project SEIS.

MCEA appreciates the opportunity to make comments on the scope of the SEIS for the Essar Steel Project. We look forward to continuing our involvement in this environmental review process.

Please let me know if you have any questions or concerns regarding any of the issues raised in these comments.

Sincerely,



Mary Winston Marrow
Staff Attorney



minnesota power / 30 west superior street / duluth, minnesota 55802-2093 / 218-723-3958 / www.mnpower.com

David J. McMillan
Executive Vice President
Fax 218-723-3989
Cell 218-590-4287
E-mail dmcmillan@allete.com

April 6, 2010

Minnesota Department of Natural Resources
Division of Ecological Resources, Box 25
Attn: Bill Johnson
500 Lafayette Road
St. Paul, MN 55155-4025

Re: Supplemental Environmental Impact Statement (SEIS) Notice of Preparation for the Essar Steel Minnesota Modifications Project.

Dear Mr. Johnson:

Minnesota Power (MP) has reviewed Essar Steel's Notice of Preparation for their upcoming SEIS.

15a MP understands that the need for the SEIS is tied to the proposal of Essar Steel Minnesota L.L.C. (ESML) to increase the production capacity of the Nashwauk facility's crusher, concentrator, and taconite pellet plant from the currently permitted 4.1 million tons per year (mtpy) to 6.5 mtpy.

MP believes that the preparation of a SEIS is appropriate due to the proposed increase in taconite production. Moreover, the public comment and approval process associated with the EIS process has long demonstrated its ability to identify concerns and issues with proposed projects, and we would expect that a stronger final project will be the outcome of this process.

15b Minnesota Power is enthusiastic about the project's socioeconomic impacts to an area which has not seen this level of growth since the construction of Butler Taconite and National Steel Pellet Company in the 1960's. MP supports ESML in their efforts to increase the production of their taconite operation and believes that the economies of scale inherent in such a proposal will only serve to strengthen ESML's cost competitiveness and viability, a move which can only benefit the area and its residents.

15c In closing, Minnesota Power again commends the MDNR for their role as steward of this SEIS process and looks forward to the opportunity to review and to comment on the Draft Supplemental Environmental Impact Statement later this year. Minnesota Power will continue to work closely with all affected parties to provide electric service to ESML, leveraging our expertise in supporting large industrial customers to ensure the successful implementation of the Essar Steel Minnesota, LLC project.

Sincerely,

A handwritten signature in black ink, appearing to read 'David J. McMillan', written over a horizontal line.

David J. McMillan

Johnson, Bill H (DNR)

From: mel milky [melmilky@yahoo.com]
Sent: Thursday, April 08, 2010 8:57 AM
To: Review, Environmental (DNR)
Subject: To: Bill Johnson

Dear Mr. Johnson,

- 16a Essar Steel Minnesota is a \$1.6 billion investment that will generate up to 2000 construction and 500 full-time permanent jobs. Essar has all of the necessary environmental approvals and permits to construct facilities in support of up to 4.1 million tons per annum (mtpa) standard pellets, 2.8 mtpa DRI pellets and 2.5 mtpa steel. The prior environmental review and permitting process included completion of a very comprehensive joint Federal and State environmental impact statement.
- 16b Essar continues to invest significant time and resources toward construction and completing the development of detailed plans to mine taconite, process ore into pellets and produce direct-reduced iron (DRI) and steel, while also finding ways to generate cost savings and achieve additional environmental improvements to the project. As you know, Essar recently proposed modifications to it's project to increase pellet production from the 4.1 mtpa originally permitted to 6.5 mtpa so the company can provide pellets for Essar Steel Algoma in addition to supplying it's on-site steel making needs. Essar will essentially mine the same ore currently permitted but in 15 years instead of 20. The pellet capacity increase will not change plans to produce direct reduced iron pellets or steel at currently permitted levels.
- 16c Essar Design Environmental Benefits, to name a few:
Detailed engineering for the proposed increase in pellet making allows the increase in pellet capacity to occur while simultaneously maintaining or improving the significant environmental aspects of the project. Specific examples include:
" No additional wetlands impacts
" Reduction in fugitive dust emissions from mine haul roads " Reductions in mercury and nitrogen oxides (NOx) emissions " Commitment to existing environmental protection, including;
o Best available control technology for air emissions
o Zero discharge to surface water and no additional water supply needed
o Integrated pellet and steel making to reduce fuel needs and related emissions " We are requesting that the DNR and MPCA follow
16d the Supplement Environmental Impact Statement rules while also ensuring that the environmental regulatory process moves forward in a timely and cost effective manner.

Sincerely and respectfully submitted,

Melissa Milkovich

Comment Letter 17

From: Terry Nevalainen [terrynevalainen@mchsi.com]
Sent: Thursday, April 08, 2010 12:54 PM
To: Review, Environmental (DNR)
Subject: Support of the Essar Steel Minnesota Project Addendum

To Whom It May Concern;

17a *Essar Steel Minnesota is a \$1.6 billion investment that will generate up to 2000 construction and 500 full-time permanent jobs. Essar has all of the necessary environmental approvals and permits to construct facilities in support of up to 4.1 million tons per annum (mtpa) standard pellets, 2.8 mtpa DRI pellets and 2.5 mtpa steel. The prior environmental review and permitting process included completion of a very comprehensive joint Federal and State environmental impact statement.*

17b *Essar continues to invest significant time and resources toward construction and completing the development of detailed plans to mine taconite, process ore into pellets and produce direct-reduced iron (DRI) and steel, while also finding ways to generate cost savings and achieve additional environmental improvements to the project. As you know, Essar recently proposed modifications to it's project to increase pellet production from the 4.1 mtpa originally permitted to 6.5 mtpa so the company can provide pellets for Essar Steel Algoma in addition to supplying it's on-site steel making needs. Essar will essentially mine the same ore currently permitted but in 15 years instead of 20. The pellet capacity increase will not change plans to produce direct reduced iron pellets or steel at currently permitted levels.*

17c ***Essar Design Environmental Benefits, to name a few:***

Detailed engineering for the proposed increase in pellet making allows the increase in pellet capacity to occur while simultaneously maintaining or improving the significant environmental aspects of the project. Specific examples include:

- *No additional wetlands impacts*
- *Reduction in fugitive dust emissions from mine haul roads*
- *Reductions in mercury and nitrogen oxides (NOx) emissions*
- *Commitment to existing environmental protection, including;*
 - *Best available control technology for air emissions*
 - *Zero discharge to surface water and no additional water supply needed*
 - *Integrated pellet and steel making to reduce fuel needs and related emissions*

17d *We are requesting that the DNR and MPCA follow the Supplement Environmental Impact Statement rules while also ensuring that the environmental regulatory process moves forward in a timely and cost effective manner.*

*Sincerely and respectfully submitted,
 "Freedom is nothing to lose."*

<i>Terry Nevalainen</i>	<i>Tamara Nevalainen</i>
<i>Civil Engineer</i>	<i>Chisholm Recreation Director</i>
<i>Chisholm, MN</i>	<i>Chisholm, MN</i>

Comment Letter 18

From: Olson, Michael E [MOLSO2@amfam.com]
Sent: Monday, April 05, 2010 2:18 PM
To: Review, Environmental (DNR)
Subject: Essar Steel

18a I believe Essar Mn. Steel will be a great addition to Nashwauk and Itasca County. With the new engineering that has been done and the shortened production haul roads, the impact on the environment will be very minimal. I believe all of the plans were presented very well at the meeting.

18b I have been a lifelong resident and business owner in Nashwauk & worked at the Butler taconite mine until it closed. I believe Essar Mn. Steel will be much more environmentally friendly than the old Butler plant.
I look forward to seeing the plant startup and working with Essar.

Mike Olson
President, Nashwauk Chamber of Commerce

Mike Olson
American Family Insurance
112 Central Avenue
Nashwauk MN 55769
Phone: 218-885-2714
Fax: 218-885-2720
molso2@amfam.com

If you do not want to receive future unsolicited commercial email advertisements or promotions from American Family Insurance you may [opt-out by clicking here](#)

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From: Scott Phaneuf [scott_phaneuf@yahoo.com]
Sent: Monday, April 12, 2010 5:56 PM
To: Review, Environmental (DNR)
Subject: "Essar Steel"

Greetings Bill,

19a My name is Scott Phaneuf and I live on Snowball Lake here in Pengilly. My home lies within the project parameters of the Essar Steel Mine. I am in 100% support of the mining project.

However, the frustration level for my family and I has escalated immensely since August of 2008. Our lives are put on hold and living "out of a suitcase" has become very frustrating. In August of 2008 Essar Steel approached us in regards to purchasing our property due to being within their parameters. Their negotiator informed us we would be bought-out and moved off the property within that year. This obviously has not happened and is a bit more than frustrating knowing that the time has to come, but when?

19b My questions to you are: 1. When will this happen, 2. What government agency can help with this, 3. Why is this taking so long when they are working already, 4. When can we expect the process to really begin and move forward, 5. Who bares the responsibility for the stress and frustration this is causing us?

19c Again, I am in support of the Essar Steel Project but I would not wish this uncertainty on anyone. It is quite frustrating.

Scott R. Phaneuf
31457 US Hwy 169
Pengilly, MN 55775

Comment Letter 20

From: Ronald R. Rich [rrr@atmrcv.com]
Sent: Monday, April 12, 2010 3:04 PM
To: Review, Environmental (DNR)
Cc: Johnson, Bill H (DNR); 'Charlotte Neigh'; 'Carol A. Overland'; 'frank weber'; 'Karen Burthwick'
Subject: Essar Steel

To Whom It May Concern:

20a

I am submitting the following comments in response the proposed SEIS scope as captured in the Preparation Notice. I understand what is desired at this early stage of the SEIS process are comments/perspectives that:

1. Identify potentially significant impacts that have been missed and should be considered;
2. Identify new issues that have emerged since the first EIS was deemed adequate;
3. Identify issues that were inadequately addressed in the first EIS;
4. Clarify or expand on specific issues already included in the scope but could be improved, especially in terms of understanding impacts or mitigation;
5. Indicate questions that should be addressed in the supplement; or
6. Offer explicit objections to the scope as proposed in the Preparation Notice.

Accordingly I have highlighted areas of the following DNR document in red, indicate which number of the above "comments/perspective(s)" I believe apply, and added an appropriate comment following each highlighted area.

I base the comments on my environmental engineering background and as one who provides advanced monitoring equipment to and consults with iron and steel companies through the world.

**Essar Steel Minnesota L.L.C.
 Supplement to Environmental Impact Statement (SEIS)
 Preparation Notice**

I. Title of EIS being supplemented and dates of completion:

Final Environmental Impact Statement, Minnesota Steel Project, Nashwauk, Minnesota, completed August 10, 2007.

II. Description of Situation Necessitating Preparation of the Supplement

The Minnesota Department of Natural Resources (DNR) in co-operation with the United States Army Corps of Engineers (USACE) prepared a joint state and federal Environmental Impact Statement (EIS) for the Minnesota Steel Industries, L.L.C. (Minnesota Steel) Taconite Mine, Crusher, Concentrator, Pellet Plant, Direct Reduced Iron (DRI) Plant, and Steel Mill Project to produce sheet steel from taconite ore, near the town of Nashwauk, Itasca County, MN. The joint EIS was completed in August, 2007 in accordance with the provisions of the National Environmental Policy Act (NEPA; 42 U.S.C. 4321 - 4347) and the Minnesota Environmental Policy Act (MEPA; Minn. Stat. Ch. 116D).

The original Minnesota Steel project involved reactivation of the former Butler Taconite mine

and tailings basin near Nashwauk, Minnesota. The project includes the dewatering of existing mine pits in the area and open pit mining operations to remove ore and waste rock. Waste rock will be stockpiled near the mine pit and ore will be hauled to the crusher with further processing in the concentrator and pellet plant. Tailings from the concentrator will be discharged to the existing Butler Taconite Stage I Tailings Basin. Taconite pellets will be sent to the DRI plant and the DRI-produced pellets will in turn be used in the steel mill. The steel mill will consist of two electric arc furnaces, two ladle furnaces, two slab casters, and a hot rolling mill to produce sheet steel.

In October, 2007 Minnesota Steel was purchased by Essar Steel Holdings Ltd. (ESHL) and Essar Steel Minnesota L.L.C. (ESML) was subsequently formed. ESHL also purchased Algoma Steel in Sault Saint Marie, Ontario, Canada in July, 2007. ESML is now proposing to increase the production capacity of the Nashwauk facility's crusher, concentrator, and taconite pellet plant from 4.1 million tons per year (mtpy) to 6.5 mtpy. The purpose of this increase in taconite pellet production capacity is to: 1) standardize the taconite pellet furnace's design and size to match other such operations owned and operated by ESHL; and 2) produce additional pellets to supply operations at Algoma Steel. ESML also proposes to reduce the 20-year life of the mine plan to 15 years, the former being the length of mine operation considered in the original EIS. **No changes to the DRI or steel mill are proposed. – Comments Type 1, 3, 5 and 6. The natural gas/electric energy based steel mill as**

20b

proposed

is not economically viable given current and projected prices of natural gas and electricity in Minnesota. Essar has delayed

the steel mill several times and has refused to disclose the economics on which the mill is based.

Essar is now proposing to

expand taconite production to supply the bulk of the produced pellets to their coal-based Algoma steel mill. If Essar does

never builds the steel mill it proposed, there is less Minnesota environmental concern for the project overall. However, if Essar

modifies their mill to use coal or petroleum coke and the DNR subsequently requires a later SEIS, the overall environmental impact

of both changes would be significantly greater than now disclosed. And the current SEIS would not be an appropriate mechanism

to address these much larger combined impacts. Accordingly, a section of this SEIS should include words to the effect that

“future changes that increase project environmental impact will require a new and complete Environmental Impact Statement”.

The proposed increase in pellet production will require the addition of a crusher/concentrator line and the installation of a larger pellet furnace, both of which will lead to an increase in air emissions. The project will include installation of mercury control technology on the pelletizing furnace. **No changes to water usage or surface discharges are expected. – Comments**

20c

Type 1, 3 and 5. The majority of

the water use and loss as indicated in the original FEIS was from slurring the taconite tailings.

And most of this water was not

recoverable for recycling. Another major water use and loss was loss from drying to the wet taconite pellets in the indurating furnace.

The adequacy of supply of water to operate the initial processes was a concern during drought years and comments were expressed

on this issue during the original FEIS evaluation These comments and concerns were never

properly addressed. The discharge from the taconite tailings area both surface and underground to Swan Lake was also a concern and was also never properly addressed.

Essar now proposes to increase production of taconite pellets from 4.1 to 6.5 million tons per year – a 58.5% increase. Water use and loss from at least these two operations will increase in direct proportion to the capacity increases. It is essential that the vastly increased water usage and surface discharges that WILL OCCUR as a result of this expansion be addressed in the SEIS.

In the Permit to Mine the planned active mine life will be reduced to 15 years rather than 20 years that was evaluated in the original EIS. The accelerated mine plan is not expected to change the footprint of the mine pits, stockpiles, or the total quantity of ore and waste rock mined

Page 1 of 7

during the life of the Permit to Mine. In addition, no additional wetlands will be affected. Although the proposed facility modifications will result in an increase in the rate of tailings generation, the total amount of tailings generated over the life of the project will not change. Therefore, no change in the footprint of the tailings basin is projected. – Comments Type 1, 3, 5 and 6.

The original FEIS supposedly covered a 20 year period of time. Essar proposed to continue operating the mine beyond the 20 years covered by the FEIS. Delays by Essar may have reduced the total active life of the mine to 15 years if the initial 2007 time horizon is used. However, if a 20 year time horizon is used starting in 2010 or 11 when the SEIS is final and if Essar mines at the rate indicated, a much greater area than the original 20 year horizon will be impacted. And the impacts beyond 20 years will be MUCH greater. The time horizon of the SEIS must extend 20 years from the conclusion of the SEIS and include the increased mine waste and mining footprints from the higher rates of mining being proposed by Essar.

Because Minnesota Steel's mining and processing operations have already been reviewed through the EIS process, State Environmental Review requirements for ESML's modified project will be met by preparing a Supplemental EIS (SEIS). In addition, because there are no additional wetland impacts, the USACE has made a preliminary determination that a supplement to the Federal EIS under NEPA is not required. Therefore the SEIS for the modifications to the originally-reviewed project proposed by ESML will be a State-only environmental review.

III. Scope of Supplement: Alternatives, Issues, and Studies

Minnesota Rules Part 4410.3000, subpart 5, requires the scope of a supplement to an EIS to be limited to alternatives, impacts, and mitigation measures not addressed, or inadequately addressed, in the Final EIS.

A. Alternatives. The SEIS will address four alternatives for the increased production in taconite pellets: 1) the Proposed Alternative (Increase taconite pellet production from 4.1 mtpy to 6.5 mtpy), which was not addressed in the original EIS; 2) the No-Action Alternative, which is the original "Build or Proposed Project" Alternative evaluated in the Minnesota Steel EIS; 3) a re-evaluation of best available control technology (BACT) for criteria pollutants whose emission are estimated to increase in amounts greater than the significant increase thresholds under 40 CFR Part 52, for any proposed changes to the BACT identified in the original EIS; and 4) air emissions control technology alternatives for mercury. Because the No-Action alternative has previously been reviewed in an EIS, the analysis for the SEIS will be limited as described in Section B below.

B. Issues. The SEIS will address the following issues:

1. *Impacts to Surface Water Quantity.* No increases in water appropriations or discharges are anticipated. - The SEIS will address the quantity of water: 1) needed to satisfy mining, beneficiation, pellet production, and steelmaking; and 2) to be discharged or transferred between waters of the state. If water in addition to that required for the project reviewed in the first EIS is determined to be needed, then the impacts of any changes on surface or groundwater resources and mitigation will be assessed in the Supplement. *Comments Type 1, 3 and 5. As discussed above, the*

20e

majority of

the water use and loss as indicated in the original FEIS was from slurring the taconite tailings. . . And most of this water was not recoverable for recycling Another major water use and loss was loss from drying to the wet taconite pellets in the indurating furnace.

The adequacy of supply of water to operate the initial processes was a concern during drought years and comments were expressed

on this issue during the original FEIS evaluation. These comments and concerns were never properly addressed. The

discharge from the taconite tailings area both surface and underground to Swan Lake was also a concern and was also never properly

addressed. Essar now proposes to increase production of taconite pellets from 4.1 to 6.5 million tons per year – a 58.5% increase.

Water use and loss from at least these two operations will increase in direct proportion to the capacity increases. It is essential vastly

increased water usage and surface discharges that WILL OCCUR as a result of this expansion be addressed in the SEIS.

2. *Impacts to Surface Water Quality.* The SEIS will address the composition of water transferred between waters of the state and from seepage from the tailings basin, and in turn estimate the change in surface water quality, including any increases in the rate of chemical additive use. No direct surface discharges from the facility were included in the original proposed project, and none are proposed for the modifications project. The original EIS did not consider the effects of changes in water quality on wild rice growing in receiving water bodies, and therefore the SEIS will address these impacts as well.

3. *Impacts on Solid Waste Generation.* An increase in the amount of solid waste generated from the larger taconite pellet furnace and associated air pollution controls

will be assessed. The increased rate of generation of tailings and waste rock will also be assessed.

4. *Impacts on Air Quality.* The increased rate of mining and taconite pellet production may lead to an increase in potential air emissions. The SEIS will include an assessment of these increases, an evaluation of the best available control technologies, and the effects associated with any increases in air emissions from those that were evaluated in the original EIS, and new pollutants or standards that were not evaluated in the original EIS. This will include an assessment of the impacts on Class II or local air quality, air quality and visibility impairment in Class I Areas (Voyageurs National Park, Boundary Waters Canoe Area Wilderness Area, Isle Royale National Park, and Rainbow Lakes Wilderness Area), and a Human Health Screening Level Risk Assessment (HHSLRA). The original EIS included a Screening Level Ecological Risk Assessment (SLERA); the need for further evaluation will be assessed, and if additional study is warranted, the SLERA will be updated in the SEIS. - *Comments Type 2, 3 and 4. Essar claims no increase in NOx as a*

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result of the expansion

because they will use lo-NOx LE burners. However, Essar proposed lo-NOx burners in the FEIS and was granted an air permit

based on low-NOx burners (if feasible) and NOx offsets. They later rejected the low-NOx burners. So their claim of lower

NOx emissions is highly suspect and based on a false premise. Please conduct independent evaluation of the proposed burner emissions.

5. *Contribution to Global Greenhouse Gas (GHG) Emissions.* The SEIS will provide information on the project's potential contribution to GHG emissions. This will include assessment of: 1) changes in GHG emissions; and 2) the project's energy and GHG efficiency, both of which are subject to MPCA-approved guidance. -

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Comments Type 2, 3 and 4. Because Lo-NOx burners

are significantly less energy efficient than normal burners, the taconite CHG emissions will increase by much more than the 58.5% proposed increase

in the project size. The DNR and the MPCA must adequately address this issue decide if a nearly doubling of CHG emissions in the taconite production justifies only an SEIS.

6. *Impacts Associated with Mercury.* The SEIS will review estimates of potential uncontrolled mercury emissions in a mercury mass balance. The SEIS will also include an evaluation of possible mercury emission reduction alternatives and a mercury mass balance for any proposed mitigation measures to be incorporated into the project. The SEIS will also include a plan for adhering to the MPCA's October-2009 policy for New or Modified Emission Sources of Mercury. *Comments Type 1, 2, 3*

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and 4. Activated charcoal appears to be the only Mercury

and other HAPs pollution control technology proposed. This effectiveness of the technology is unclear and the waste charcoal would need to be treated as

a hazardous solid waste not previously considered in the FEIS. The DNR and the MPCA must adequately address this issue and include alternative HAPs removal technologies.

7. *Cumulative Air Quality Effects – Class I PSD Pollutants.* The SEIS will evaluate the potential impacts of Prevention of Significant Deterioration (PSD) pollutants, including PM₁₀, NO_x, and SO₂, on Class I Areas. The analysis will use the CALPUFF

modeling system reflecting Federal Land Manager (FLM) guidance to estimate the ambient air quality concentrations in Class I areas around the project site. Specific details of the modeling for Class I areas will be resolved with the FLMs and MPCA staff. *Comments Type 2, 3 and 4. (See Comment on Item 4 Above).*

The DNR and the MPCA must adequately address this issue and decide if NOx offsets exist in the area since cumulative NOx limits will be exceeded.

8. *Cumulative Air Quality Effects – Class I Acid Deposition and Ecosystem Acidification.*

The SEIS will include an assessment of the estimated project emissions for potential sulfur and nitrogen deposition onto Class I areas around the project. In addition to the Class I areas, a semi-quantitative approach will be used to assess the potential cumulative effects of ecosystem acidification.

9. *Cumulative Air Quality Effects – Class I Visibility Impairment.* The SEIS will include a cumulative effects analysis assessing the potential visibility effects on Federal Class I areas. The SEIS will use a semi-quantitative approach in the analysis. The SEIS will also describe how the proposed modification project affects the NE Minnesota Regional Haze Plan. *Comments Type 2, 3 and 4. (See Comment on Item 4 Above).*

The DNR and the MPCA must adequately address this issue, and thoroughly explain what “semi-quantitative” methods are used because cumulative NOx limits will be exceeded and these emissions are presumed to be the principal cause of the visibility impairment .

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10. *Cumulative Mercury.* The SEIS will report cumulative mercury effects appropriate to potential changes in air dispersion over local lakes and their watersheds that may result from the modifications project. The potential for the project to significantly increase mercury contamination of fish, either alone or as a result of cumulative local deposition with other nearby, new, or proposed emission sources will be identified.

11. *Cumulative Effects – Climate Change.* The SEIS will report information available from governmental and scientific sources on climate change. The discussion will include: 1) background information on the issue of climate change; and 2) projected environmental effects due to climate change extrapolated to the state level. Potential impacts to natural resources will be identified, although no assessment of potential significance will be required.

12. *Socioeconomic Effects.* The SEIS will analyze the general social and economic effects of the proposed modifications project. This will include the direct and indirect effects on local economic development, tax base, and demand for public services.

C. Special Studies or Research. The SEIS will rely on the following special studies or research:

1. *Updated Mine Plan.* A mine plan that reflects changes from the proposed modifications has been completed by ESML and will be available for use in the SEIS. It describes pit geometry, shows plans for phasing of pit development, and includes materials flow rates for ore, lean ore, waste rock, and overburden broken out by area. It also describes necessary mine facilities such as haul roads and ramps. –

Comments Type 1, 2, 3, 4 and 5.

This plan should extend until the year 2031 – 20 years from the projected 2011 SEIS span.

2. *Updated Water Quantity and Water Chemistry Balance.* The SEIS will require an updated detailed water quantity and water chemistry balance for the project that includes: processing plant needs; mine pit dewatering; lake/stream augmentation; and tailings basin seepage/discharge. Additional sources of water to supply the processing plant will be identified if the updated water balance indicates a water deficiency for the processing plant. The water quantity and chemistry balance will also consider the water reuse and recycle system (WRRS) previously permitted and whether the proposed modification changes the feasibility of the WRRS with respect to the potential build-up of dissolved solids or other water quality concerns. This information will be used to model how affected watershed yield and lake water levels would change both during and after mining. – *Comments Type 1, 2, 3, 4 and 5.*

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The SEIS must rely on an independent evaluation of these issues – Essar provided data has been to date inaccurate and insufficient.

3. *Wild Rice.* Information on the current presence of wild rice in receiving water bodies from the ESML project will be identified and assessed. Changes to sulfate concentrations for affected water bodies will be modeled. This information will be used to identify potential impacts to wild rice in receiving waters due to changes in sulfate concentrations and/or water levels. Potential adverse environmental effects to water bodies will be identified and monitoring and/or mitigation will be developed to detect changes and to avoid and/or minimize impacts.
4. *Solid Waste Generation Estimates and Disposal Options.* The SEIS will evaluate the increased rate of tailings deposition and the effect on the tailings basin footprint, height, operation, and stability as well as fugitive dust emissions. The SEIS will also assess the quantity of solid wastes to be generated such as emission control dust and slag. The original EIS indicated that solid and hazardous wastes would be

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disposed of in off-site facilities according to Minnesota Rules Parts 7035 and 7045. No changes to stockpiles or solid waste disposal options are proposed.

5. *Air Emission Inventory.* The SEIS will include an updated air emission inventory that reflects changes of the proposed increase in taconite pellet production, increased rate of mining, changes to the mine plan, updated air emission control equipment, and any new pollutants that were not evaluated in the original EIS. – *Comments Type 2,*

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3, 4 and 5. Essar inadequately disclosed NOx and CO data in the EIS process and has now reduced their emissions estimates to fit within their existing air permit limits. There is no basis disclosed for their claims. Please do not rely on Essar provided air emissions information – conduct an independent assessment.

6. *Best Available Control Technologies (BACT) Evaluation for Air Emissions.* The SEIS will include an updated BACT evaluation for criteria pollutants whose increase in potential emissions are greater than the air emission major modification thresholds for PSD air permit requirements in 40 CFR Part 52 and for any proposed changes to control technologies previously permitted. – *Comments Type 2, 3, 4 and 5. Essar*

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inadequately disclosed NOx and CO data in the EIS process and has now reduced their emissions estimates to fit within their existing air permit limits. There is no basis disclosed for their

claims. Please do not rely on Essar provided air emissions information – conduct an independent assessment.

20o 7. *Class I Air Quality Analysis.* The SEIS will include modeling of PM₁₀, NO_x, and SO₂ to assess air quality related values such as visibility and acid deposition in Voyageurs National Park, Boundary Waters Canoe Area Wilderness Area, Isle Royale National Park, and Rainbow Lakes Wilderness Area. Modeling under a protocol approved by MPCA will be conducted using the CALPUFF modeling system based on FLM-approved guidance and modeling protocol. The SEIS will include an assessment of acid deposition from NO_x and SO₂ emissions from the project in the Class I areas. – *Comments Type 2, 3, 4 and 5. Logic suggests air emissions will increase by approximately the same amount as Essar expands taconite capacity. Regardless of Essar claims. If the model shows otherwise, please disclose to the public in detail why.*

20p 8. *Class II Air Quality Analysis.* The SEIS will include modeling under a protocol approved by MPCA of criteria pollutants for which there are state and/or federal air quality standards to estimate the change in air quality impacts at the project boundary as a result of the proposed modification, including any new pollutants or standards that were not evaluated in the original EIS. Modeled concentrations in the original EIS will be considered in the analysis. A comparison to state and federal air quality standards will also be made. – *Comments Type 1, 2, 3, 4 and 5. The particle size distribution assumed in the FEIS was not accurate and seemed to minimize the true inhaled health hazard of taconite tailings dust. The UMD taconite health study and actual measurements should be more accurate than those previously assumed. Please assess the tailings particle size distribution and use the updated values in the SEIS.*

9. *Mercury Mass Balance and Control Technology Assessment.* The SEIS will include estimates of potential uncontrolled mercury emissions in a mercury mass balance. Possible mercury emission reduction alternatives will be evaluated, including a mercury mass balance for any proposed mitigation measures to be incorporated into the project. The SEIS will also include a plan for adhering to the MPCA's October-2009 policy for New or Modified Emission Sources of Mercury.

20q 10. *Human Health Screening Level Risk Assessment (HHSLRA).* The HHSLRA will be updated for increases in air emissions and discharges of potential risk driver chemicals, changes to toxicity values, and changes to risk assessment protocols according to a work plan approved by the MPCA. – *Comments Type 1, 2, 3, 4 and 5.*

(see 20p) *See tailings dust comments above.*

11. *Screening Level Ecological Risk Assessment (SLERA).* The original EIS included a SLERA that assessed the ecological risk associated with the SEIS No Action Alternative. DNR's consultant will review: 1) the original EIS documentation; and 2) the underlying changes in emissions and discharges of risk driver chemicals associated with the modifications project. If it is determined that there is a potential increase in the ecological risk associated with the project, then the proposer will update the SLERA based on a protocol approved by the DNR. The DNR consultant

will review the updated SLERA and incorporate the assessment of impacts and potential mitigation into the SEIS.

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– Comments Type 1, 2, 3, 4 and 5. The Special Studies below seem to duplicate what should be completed in tasks above. Please see previous comments.

12. *Greenhouse Gas Emissions Inventory.* Greenhouse gas emissions of the project will be quantified and reported in the SEIS as described in MPCA air permitting guidance. The guidance recommends quantification of direct greenhouse gas emissions as well as those generated through the use of energy at the facility. Changes in GHG emissions due to habitat conversion and/or disturbance will also be calculated.
13. *Cumulative Effects on Class I Air Quality – PSD Pollutants.* The SEIS will evaluate the potential impact of PDS pollutants, including PM₁₀, NO_x, and SO₂, on the Class I areas. This analysis will use NO_x, SO₂ and speciated PM₁₀ (e.g., coarse particulate; fine particulate) data, as well as primary sulfate emissions for the project, and use the CALPUFF modeling system per FLM guidance to estimate ambient air concentrations in Class I areas around the project site. Specific details of the modeling for Class I areas will be resolved with the FLMs. -
14. *Cumulative Effects on Class I Air Quality – Acid Deposition and Ecosystem Acidification.* The SEIS will include an assessment of the project's estimated emissions for potential sulfur and nitrogen deposition onto Class I areas. In addition to Class I areas, a semi-quantitative approach will be used to assess the potential cumulative impacts of ecosystem acidification.
15. *Cumulative Effects on Class I Air Quality – Visibility Impairment.* The SEIS will include a cumulative impacts analysis assessing the potentially visibility impacts on Federal Class I areas. The SEIS will use a semi-quantitative approach in the analysis. The SEIS will also describe how the proposed modification impacts the NE Minnesota Regional Haze Plan.
16. *Cumulative Mercury Effects.* The SEIS will include assessment of whether the proposed modifications project would cause a change in fish tissue concentrations from that previously modeled. If air dispersion modeling predicts that mercury concentrations over the lakes and their watersheds are not substantially changed under the modifications project, then the existing Keetac Expansion Project cumulative impacts assessment will be used to represent the impacts of the revised ESML project. If the mercury concentrations are demonstrated to change substantially, then the cumulative mercury impacts analysis will include new modeling that includes updated emissions parameters for the proposed facility modifications. The goal of this analysis is to determine if the potential local deposition of mercury from the project will significantly increase mercury contamination of fish, either alone or as a result of the cumulative local deposition with other nearby, new, or proposed emission sources.
17. *Cumulative Human Health Screening Level Risk Assessment.* The SEIS will include a cumulative inhalation risk analysis that will follow MPCA general guidance. Background risk will be derived from ambient air monitoring data and the incremental risk from the proposed project will be added to the background risk to estimate potential cumulative risk for the Nashwauk area.

18. *Cumulative Effects on Climate Change.* The SEIS will report information available from governmental and scientific sources on climate change. The discussion will include: 1) background information on climate change; and 2) projected environmental effects due to climate change extrapolated to the state level. Potential impacts to natural resources will be identified.
19. *Socioeconomic Effects.* ESML will acquire information and analyze possible general social and economic impacts of the proposed project modifications in the SEIS. This will include the direct and indirect effects on local economic development, tax base, and demand for public services.

IV. Proposed Time Schedule

Preparation Notice Publication March 22, 2010
Preparation Notice Comment Period Ends April 12, 2010
Distribution of Draft Supplemental EIS October 2010 to December 2010
Distribution of Final Supplemental EIS January 2011 to March 2011
Determination of SEIS Adequacy February 2011 to April 2011

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Thank you,
Ronald R. Rich
President
Atmosphere Recovery, Inc.
7632 Washington Avenue South
Eden Prairie, MN 55344

Comment Letter 21

From: Margie Ritter [mritter@daxshow.com]
Sent: Monday, April 12, 2010 4:33 PM
To: Review, Environmental (DNR)
Subject: support of ESSAR

Bill Johnson
Division of Ecological Services, Box 25
MN Dept. of Natural Resources
500 Lafayette Road
St. Paul, MN 55155

Dear Mr. Johnson:

21a As past chair of the Grand Rapids Area Chamber of Commerce I would like to lend my voice in support of the Essar Steel project. This project is vitally important for our region's economy and long term vitality. I do believe that the environmental due diligence from the state agencies will protect our environment while this project will give needed jobs and economic help for many of our communities under-employed. Please don't delay this project needlessly.

Thanks for the opportunity to be heard

Margie Ritter
VP
Decorated Apparel Expo

Comment Letter 22

From: Bud Stone - Grand Rapids Area Chamber of Commerce [bud@grandmn.com]
Sent: Friday, April 09, 2010 7:05 AM
To: Review, Environmental (DNR)
Cc: Frank Ongaro (E-mail); Craig Pagel (E-mail 2); Kevin Kangas (E-mail); Jake Goering (E-mail)
Subject: Comments- ESSAR Steel SEIS
Attachments: MN Steel Resolution on Letterhead.doc

Bill Johnson
Division of Ecological Services, Box 25
MN Dept. of Natural Resources
500 Lafayette Road
St. Paul, MN 55155

Dear Mr. Johnson:

22a

The Grand Rapids Area Chamber of Commerce would like to go on record as a firm supporter of the ESSAR Steel Project. Attached is our formal resolution that was drafted by our Board of Directors on August 15, 2005 when the ESSAR Steel Project was still Minnesota Steel.

Northeastern Minnesota is the "Industrial Park" of the State of Minnesota. Mining has been a way of life here for over one hundred years. The ESSAR Steel Project will help add to the economic stability of this region and support quality jobs and quality of life, and we encourage the DNR and the MPCA to help advance this project with the least amount of delay possible.

Best Regards,

Bud Stone - President
Grand Rapids Area Chamber of Commerce
One NW Third Street
Grand Rapids MN 55744
bud@grandmn.com
218-326-6619
1-800-472-6366 Toll free
www.grandmn.com

Comment Letter 23

From: Paul Tufte [ptufte@comolp.com]
Sent: Monday, April 12, 2010 8:54 AM
To: Review, Environmental (DNR)
Subject: Thank You for your help!

April 12, 2010

Bill Johnson
Division of Ecological Services, Box 25
MN Department of Natural Resources
500 Lafayette Road
St. Paul, MN 55155

Dear Mr. Johnson:

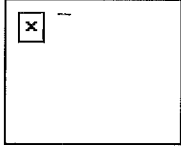
- 23a I am writing to support the Essar Steel project and to urge an effective and timely review of the Supplemental Environmental Impact Statement.
- 23b Essar Steel will generate as many as 2000 construction and 500 full-time permanent jobs at a time when our region and state are sorely in need of momentum to restart our recession-weakened economy. Considering the thorough work that has already been done on the state and federal environmental review and permitting processes for the project as originally proposed, I hope you can help expedite the supplemental review to allow the expanded project to move forward as quickly as possible.
- 23c As a lifelong resident of the region, I am fully supportive of responsible environmental regulation to protect our resources. I hope you'll agree that the DNR and PCA can fulfill their regulatory responsibilities and still be responsive to ensure timely reviews when major investments and job creation are at stake. Sound, yet efficient, regulatory review can certainly help differentiate Minnesota and give us an edge when companies are considering where to create jobs.

Thank you for your consideration.

Best regards,

Paul A. Tufte
Division Manager
COMO OIL & PROPANE
P.O. Box #68
11419 E. Hwy. #37
Hibbing, MN 55746
Ph. 218-262-0855
cell 218-966-6647
ptufte@comolp.com

From: Rob West [rwest@apexgetsbusiness.com]
Sent: Friday, March 19, 2010 10:10 AM
To: environmentalrev@state.mn.us
Cc: Johnson, Bill H (DNR)
Subject: ESSAR planned capacity increase



Dear Minnesota Department of Natural Resources –

24a

On behalf of the 66 member/investors of APEX, a privately held business and economic development corporation located in Northeastern Minnesota, we are writing in support of ESSAR's request to expand its production capacity from 4.1 million tons per year (mtpy) to 6.5 mtpy. We do not believe that the proposed expansion will cause any significant impact or create additional environmental issues with particulate emissions and noise. Further, we do not believe if this request is granted, it will create additional concerns regarding human health and safety. We therefore support this request and we welcome the additional employment opportunities that it may create within the region.

We are available to offer additional comment at your request.

Sincerely,

Rob West
President & CEO
218-740-3667