

Fay, Lisa (DNR)

From: Jeff Borling [jib-creative@hotmail.com]
Sent: Tuesday, May 31, 2011 10:50 AM
To: Review, Environmental (DNR)
Subject: Supplemental EIS for Essar Steel

TO:
Lisa Fay, SEIS Project Manager
Environmental Policy and Review Unit
MNDNR Division of Ecological and Water Resources
500 Lafayette Rd., Box 25
St. Paul, MN 55755-4025

Dear Ms. Fay:

After reading the Draft Supplemental EIS, one can easily conclude that the mitigative measures previously identified for the project as developed by Minnesota Steel and those proposed by Essar's detailed design changes are adequate to protect human health and the environment. Specifically, the following points can be made about the project modifications as proposed by Essar:

- o No new wetlands are impacted;
- o Adequate water supply is available to support the small increase in water demand;
- o The zero surface liquid discharge is maintained;
- o Wild rice near Swan Lake will not be impacted;
- o Clean burning natural gas is still used for all process heating;
- o Air quality standards are met with improved mine plan and installation of best available control technology and efficient operation of the pelletizing furnace;
- o Human health and ecological impacts are lower than thresholds that would require any further mitigation; and
- o Existing mining and environmental permit monitoring and reporting requirements are adequate to ensure environmental protection/compliance

Thank you in advance for working to expedite the permitting process for this exciting project.

Sincerely,

Jeff Borling

1008 E 10th Street
Duluth, MN 55805
jib-creative@hotmail.com

Fay, Lisa (DNR)

From: Cimermancic, David [David.Cimermancic@graybar.com]
Sent: Friday, May 27, 2011 8:03 AM
To: Review, Environmental (DNR)
Subject: Essar Steel Minnesota Draft Supplemental EIS Support

I support the conclusion that the potentially significant environmental impacts have been adequately studied and Essar's proposed modifications provide adequate mitigative measures for the project to move forward as proposed. Please contact me if you have any questions.

Thank you!

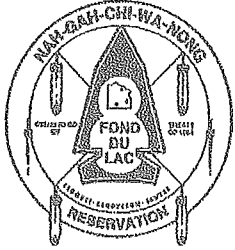
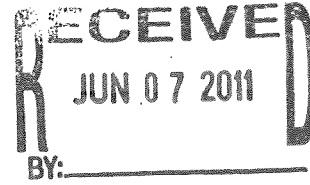
David Cimermancic | Branch Supervisor
3404 15th Avenue East Unit 3 | Hibbing, MN 55746 | Office (218) 262-5858 | Fax (218) 262-5854 |
Hours 7AM to 4PM M-F
david.cimermancic@graybar.com
www.graybar.com - *Works to Your Advantage*



Fond du Lac Reservation

Resource Management

1720 Big Lake Road
Cloquet, MN 55720
Phone (218) 878-8001
Fax (218) 879-4854



Administration June 2nd, 2011
Conservation
Environmental
Fisheries
Forestry
Natural Resources
Wildlife

Lisa Fay
SEIS Project Manager
Environmental Policy and Review Unit
MNDNR Division of Ecological and Water Resources
500 Lafayette Road, Box 25
St. Paul, MN 55155-4025

RE: Essar Draft Supplemental Environmental Impact Statement (DSEIS)

Dear Ms Fay,

The Fond du Lac Band of Lake Superior Chippewa (the Band) hereby submits the following comments on the air quality-related sections of the Essar DSEIS. Comments on other sections of the document may be submitted under separate cover. The Band is concerned with this facility because pollutants emitted from it may affect Band members' usufructuary rights in the Ceded Territories, including hunting, fishing, and gathering rights.

First, please ensure that control equipment evaluations include the most up-to-date information available. Some changes may have taken place in the several years since these evaluations were performed for Minnesota Steel, Inc. (MSI).

The Band is concerned about projected increases in releases of hazardous air pollutants (pages 4.3-3 through 4.3-7 of the DSEIS). These increases are due to a number of factors, one of which is the expected increase in production from when this project was initially proposed by MSI. While the projected increase in hydrogen fluoride emissions (an increase of 9495%) is discussed on page 4.3-18, this increase is the only one deemed "noteworthy". While the text on page 4.3-18 states that all pollutants that are projected to increase by more than 10% went through a screening level assessment, the results of this assessment do not appear to be included in the SDEIS. Some pollutants that are expected to increase by large percentages are as follows: chromium (total) - 72% increase; chromium (hexavalent) - 36% increase; fluorine/fluorides - 877 % increase; hydrogen

chloride – 72% increase; lead – 40% increase; potassium compounds – 112% increase; sodium carbonate – 92% increase; sulfur dioxide - 64% increase; sulfuric acid - 55% increase; thallium – 99% increase; tin compounds - 174% increase. In all, total HAPs are projected to increase by 187%.

The DSEIS needs to include more detail on these projected increases. The modeling results need to be shown so that reviewers can see and evaluate the projected changes in the individual cancer risks and non-cancer hazard quotients that result from the increases in these pollutants. It would also be helpful if Table 4.3-1 had a column indicating why the increase in emissions is occurring – if it is due to increased production, updated emission factors, etc.

Another item of concern is found on page 4.3-12 where the document states that groundwater exposures were not considered in evaluating the impacts of hazardous air pollutants. While people may not ingest appreciable amounts of surface water from area water bodies, they certainly could unknowingly ingest contaminated water from groundwater sources, through their wells.

On page 4.3-17, it looks as though there may be a typographical error. The first paragraph below the bullet points begins “For all three receptor types...did not exceed the guideline values of 1E-05 for cancer or 0.1 for non-cancer”. In contrast, the text on page 4.3-15 states “Values below 1.0 indicate that exposure is expected to be less than the level that might cause an adverse impact (non-cancer toxicity) in some people”. These two values appear to be contradictory.

The Band continues to have concerns about how the state of Minnesota will fulfill its Regional Haze obligations. The Regional Haze plan submitted by the MPCA to Region 5 - EPA is still under review. At the same time, Table 4.2-12 of this SDEIS shows that this project is expected to result in impacts above the Federal Land Manager’s level of concern at Isle Royale, the Boundary Waters Canoe and Wilderness Area, and Voyageur’s National Park. Several mitigation options are mentioned in the text of the document, and the Band urges the MPCA and the MNDNR to require the maximum amount of reduction available, including the installation of control equipment that may not currently be in use at facilities of this type or in the US.

While Section 5.1.2.1 lists reductions of haze-causing pollutants anticipated in Northern Minnesota, the fact remains that the state is not projected to meet the Uniform Rate of Progress needed to achieve the state of no manmade effect on visibility by the year 2064. The led to the introduction of the Northeastern Minnesota Plan, in which facilities in this area will work to reduce SO₂ and NO_x emissions in the area by 20% by 2012 and by 30% by 2018. The Band feels that we cannot afford to become complacent with regard to reaching regional haze goals, and that the ability of industry to meet these goals should not be taken as absolute.


The Band appreciates Essar’s work in attempting to reduce mercury emission through the use of activated carbon control equipment. We would still like to note that any new

emissions above 3 pounds per year that are not controlled need to be mitigated, as in the state Total Maximum Daily Loading. This does not appear to be addressed in the DSEIS. Please also note that while increasing stack heights means that less mercury would be deposited locally, the mercury will eventually be deposited somewhere, leaving others to deal with the problem (page 5.3-4).

While the Climate Change section does not specifically say so, the Band assumes that this facility will be subject to Greenhouse Gas Best Available Control Technology Requirements. While the USACE has determined that a supplement to the federal EIS under NEPA is not required (because there are no additional wetlands impacts), the Band believes that the new National Environmental Policy Act guidance on assessing climate change within the EIS structure should apply.

Thank you for permitting us to submit these comments. If you have any further questions, please call me at 218-878-7108.

Sincerely,


for Joy Wiecks

Joy Wiecks
Air Quality Technician
Fond du Lac Band

c.c. Dennis Peterson – Fond du Lac Legal Counsel
Wayne Dupuis – Fond du Lac Environmental Program Manager

Fay, Lisa (DNR)

From: Bud Stone - Grand Rapids Area Chamber of Commerce [bud@grandmn.com]
Sent: Monday, May 23, 2011 12:43 PM
To: Review, Environmental (DNR)
Cc: kevin.kangas@essar.com
Subject: Essar Steel Minnesota Draft SEIS comments

May 23, 2011

Lisa Fay, SEIS Project Manager
Environmental Policy & Review Unit
MNDNR Division of Ecological and Water Resources 500 Lafayette Road, Box 25 St. Paul, MN
55155-4025

Dear Ms. Fay:

The Grand Rapids Area Chamber of Commerce would once again like to go on record as a strong supporter of the Essar Steel Minnesota Project. We believe that through the review process that has taken place, the modifications proposed by Essar Steel Minnesota will have no additional potential negative impacts on the environment and we would ask that you work diligently to help us bring this project to fruition as rapidly as possible.

Thank you for the opportunity to comment on this important Northeastern Minnesota project.

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
www.facebook.com/grchambermn

(Rec'd 5/24/11)



Comment Form

Essar Steel Minnesota Modifications Project Draft Supplemental Environmental Impact Statement

Comments on the Draft SEIS will be accepted until 4:30, June 8, 2011

Written Comments to:

Lisa Fay, SEIS Project Manager
Environmental Policy & Review Unit
MN DNR Division of Ecological and Water Resources
500 Lafayette Rd., Box 25
St. Paul, MN 55155
Fax: 651-297-1500

RECEIVED
MAY 24 2011
BY: _____

Comment From: Name Andrew Haacklau
Address 1029 3rd Ave NW Grand Rapids, MN

Based on the information provided by Essar for the
SEIS and the information originally submitted for the
EIS, I do not feel there is any information that
should negatively impact the ability of Essar to gain approval
on the amendments proposed. The west Range
cities are excited about this project and look forward
to the positive economic impact that it will bring
with it.

(Use back of form if necessary)

The Draft SEIS document is posted on DNR's website at
<http://www.dnr.state.mn.us/input/environmentalreview/essar/index.html>

- Public review copies are also available at the following locations:
- DNR Library, 500 Lafayette Rd. St. Paul, MN
 - Duluth Public Library, 520 West Superior Street, Duluth, MN
 - Hibbing Public Library, 2020 E 5th Ave, Hibbing, MN
 - Keewatin Public Library, 125 3rd Avenue W., Keewatin, MN
 - Grand Rapids Area Library, 140 NE 2nd Street, Grand Rapids, MN
 - MPLS Public Library – Tech. and Science, 300 Nicollet Mall, Minneapolis, MN

Fay, Lisa (DNR)

From: Lory Fedo [lfedo@hibbing.org]
Sent: Wednesday, June 01, 2011 9:43 AM
To: Review, Environmental (DNR)
Subject: Essar SEIS

I am writing in support of Essar Steel on behalf of the Hibbing Area Chamber of Commerce.

Our Chamber Board of Directors and it's membership is in full support of the Essar project. Our membership includes over 400 hundred businesses across Minnesota's Iron Range. We believe that the mitigative measures previously identified for the project as developed by Minnesota Steel and those proposed by Essar's detailed design changes are adequate to protect human health and the environment.

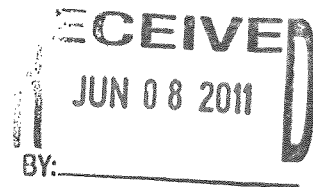
The following points support our position:

- No new wetlands are impacted;
- Adequate water supply is available to support the small increase in water demand;
- The zero surface liquid discharge is maintained;
- Wild rice near Swan Lake will not be impacted;
- Clean burning natural gas is still used for all process heating;
- Air quality standards are met with improved mine plan and installation of best available control technology and efficient operation of the pelletizing furnace;
- Human health and ecological impacts are lower than thresholds that would require any further mitigation; and
- Existing mining and environmental permit monitoring and reporting requirements are adequate to ensure environmental protection/compliance

Please support our conclusion that the potentially significant environmental impacts have been adequately studied and Essar's proposed modifications provide adequate mitigative measures for this very important project to move forward as proposed.

Thank you.

Lory Fedo
President, CEO
Hibbing Area Chamber of Commerce
211 E. Howard, Box 727
Hibbing, MN 55746
218-262-3895
lfedo@hibbing.org



June 6, 2011

Lisa Fay, SEIS Project Manager
Environmental Policy and Review Unit
MNDNR Division of Ecological and Water Resources
500 Lafayette Road, Box 25
St. Paul, MN 55155-4025

SUBJECT LINE: Essar SEIS

Dear Ms. Fay:

- ✓ I understand this project is important to the economics of the Iron Range.
- ✓ I understand that Erroneous –{ (Thesaurus U.S. English) mistaken, flawed, wrong, incorrect, invalid, untrue} statement were made in the previous FEIS.
- ✓ I understand that many assessments won't be complete until permitting.
- ✓ I live on Snowball lake (60 years +) and have eaten fish from here all my life. For the first time I saw iron ore deposits in the water at my lakeshore property in Spring of 2011.
- ✓ I may not have the proper wording, but I believe you can understand what I am asking for. If not, please feel free to contact me to discuss.
- ✓ Even if your answers were written in a previous E.I.S, F.E.I.S . or S.E.I.S., I would like you to restate your answers and tell me again the figures and contact information.

What I need is:

- A Guide for understanding WATER quality/pollution/mercury/clarity, etc. for Snowball Lake.
 1. What is the **CURRENT CONDITION** of the above? (I know Itasca C.C. has this information)
 2. What is the **acceptable range** of the above conditions?
 3. Who is doing the testing?
 4. Who is verifying the testing?
 5. Where do I get a written copy of the tests to confirm and a person/phone number to contact if I have questions?
- A Guide for understanding AIR quality/pollution/clarity, etc.
 1. What is the Current Condion of the above at Snowball Lake?
 2. What is the acceptable ranges of the above conditions
 3. Who is doing the testing?
 4. Who is verifying the testing?
 5. Where do I get a written copy of the tests to confirm and a person/phone number to contact if I have questions?

- A Guide for understanding NOISE levels/pollution etc.

What are the acceptable noise levels ?

Who is doing the testing?

Who is verifying the testing?

Where do I get a written copy of the tests to confirm and a person/phone number to contact if I have questions?

Respectfully Submitted,

Lori Houwman (power of attorney) for Evelyn Mollergren

31572 Snowball Road

Pengilly, MN 55775

Home phone (218) 247-7693

Cell phone (218)929-9171

Email: lorihouwman@yahoo.com



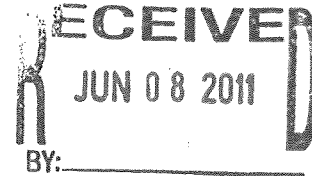
Comment Form

Essar Steel Minnesota Modifications Project Draft Supplemental Environmental Impact Statement

Comments on the Draft SEIS will be accepted until 4:30, June 8, 2011

Written Comments to:

Lisa Fay, SEIS Project Manager
Environmental Policy & Review Unit
MN DNR Division of Ecological and Water Resources
500 Lafayette Rd., Box 25
St. Paul, MN 55155
Fax: 651-297-1500



Comment From:

Name C.S. JEFFERS

Address 31590 SPRUCE DR. PENGILLY, MN

WHEN I ASKED AN ESSAR REP. TO TELL ME WHICH HOMES WERE BEING PURCHASED IN THE SNOWBALL AREA, HE REFUSED TO SAY. WHEN I ASKED WHAT CRITERIA WAS MET TO BE INCLUDED HE AT FIRST REFUSED TO SAY, BUT THEN SAID "THEY WERE ON THE LINE". THE LINE HE REFERED TO IS AN ARBITRARY LINE WHICH ORIGINALLY RAN ALONG HWY 169 BUT WAS MOVED AFTER IT WAS MENTIONED THAT THERE WERE SEVERAL HOME IN THE SNOWBALL AREA INSIDE THE LINE. THE LINE WAS REDRAWN TO EXCLUDE THIS AREA. IT'S OBVIOUS THESE HOMES WILL BE IN DANGER AND/OR UNLIVABLE SO WHY ISN'T THE LINE STILL AT HWY 169 AND EVERYONE NORTH OF IT TAKEN CARE OF.

(Use back of form if necessary)

The Draft SEIS document is posted on DNR's website at <http://www.dnr.state.mn.us/input/environmentalreview/essar/index.html>

Public review copies are also available at the following locations:

- DNR Library, 500 Lafayette Rd. St. Paul, MN
- Duluth Public Library, 520 West Superior Street, Duluth, MN
- Hibbing Public Library, 2020 E 5th Ave, Hibbing, MN
- Keewatin Public Library, 125 3rd Avenue W., Keewatin, MN
- Grand Rapids Area Library, 140 NE 2nd Street, Grand Rapids, MN
- MPLS Public Library – Tech. and Science, 300 Nicollet Mall, Minneapolis, MN

MY NEIGHBORS HOME IS BEING PURCHASED.
I CAN SEE IT FROM MY HOUSE. ESSAR REPS. SAY MY
HOUSE ISN'T INCLUDED. I AM JUST AS MUCH IN
SEOPARDY AS ANYONE. I DON'T BELIEVE IT IS
SAFE OR HEALTHY TO BE HERE, IN THIS CLOSE
PROXIMITY TO THE MINE, YET NOONE WILL BE UP
FRONT ABOUT WHY ONE HOME IS RELOCATED WHILE
OTHERS ARE LEFT TO SUFFER IN AN UNLIVABLE
SITUATION. WE NEED HONEST, UP FRONT ANSWERS.



Comment Form

Essar Steel Minnesota Modifications Project Draft Supplemental Environmental Impact Statement

Comments on the Draft SEIS will be accepted until 4:30, June 8, 2011

Written Comments to:

Lisa Fay, SEIS Project Manager
Environmental Policy & Review Unit
MN DNR Division of Ecological and Water Resources
500 Lafayette Rd., Box 25
St. Paul, MN 55155
Fax: 651-297-1500

Comment From:

Name C. S. JEFFERS
Address 31590 SPRUCE DR. PENGILLY, MN.

AT THE MARCH 2010 MEETING IN
NASHWAUK, YOUR D.N.R. REP. STOOD AT THE MAP
SHOWING MINE LOCALE AND MY HOMES LOCATION AND
TOLD ME MY HOME WAS DEFINED AS BEING "IN
THE BLAST ZONE" AND WE WOULD HAVE TO BE MOVING.
NOW YOUR NEW REP. AT THE MAY 2011 MEETING SAID
500 FEET IS ALL WE'RE ALLOWED TO SAY. THE COUNTY
BOARD OR SOMEONE ELSE NEEDS TO ADDRESS THIS.
WHAT CHANGED? IF YOU WON'T SET REASONABLE LIMITS
ON THIS, WHAT GOOD ARE YOU. YOUR REP. DID SAY THAT
THERE ARE OVERLAPPING RESPONSIBILITIES BETWEEN STATE
AGENCIES AND IT SEEMS THEY ALL WANT SOMEONE ELSE

(Use back of form if necessary)

The Draft SEIS document is posted on DNR's website at
<http://www.dnr.state.mn.us/input/environmentalreview/essar/index.html>

Public review copies are also available at the following locations:

- DNR Library, 500 Lafayette Rd. St. Paul, MN
- Duluth Public Library, 520 West Superior Street, Duluth, MN
- Hibbing Public Library, 2020 E 5th Ave, Hibbing, MN
- Keewatin Public Library, 125 3rd Avenue W., Keewatin, MN
- Grand Rapids Area Library, 140 NE 2nd Street, Grand Rapids, MN
- MPLS Public Library – Tech. and Science, 300 Nicollet Mall, Minneapolis, MN

TO MAKE A DECISION. EVERYONE WANTS TO
DRAW A PAYCHECK, BUT NOONE WANTS TO DO
THE JOB OR MAKE THE PROPER DECISIONS.



Comment Form

Essar Steel Minnesota Modifications Project Draft Supplemental Environmental Impact Statement

Comments on the Draft SEIS will be accepted until 4:30, June 8, 2011

Written Comments to:

Lisa Fay, SEIS Project Manager
Environmental Policy & Review Unit
MN DNR Division of Ecological and Water Resources
500 Lafayette Rd., Box 25
St. Paul, MN 55155
Fax: 651-297-1500

Comment From: Name C. S. JEFFERS
Address 31590 SPRUCE DR. PENGILLY, MN.

AT THE MAY 2011 MEETING, IN SPEAKING WITH A
TRIBAL REP AND A D.N.R. REP. I WAS TOLD THAT THE DUST
CAN BE DETRIMENTAL TO NOT ONLY THE RESPIRATORY
SYSTEM BUT ALSO THE CARDIO/VASCULAR SYSTEM. MY
WIFE AND I ARE BOTH HEART SURGERY SURVIVORS. THE
DUST FROM THIS MINE CONSTITUTES A DOUBLE THREAT TO
OUR LIVES.

WHEN I WENT TO THE AIR QUALITY TABLE
THE D.N.R. HAD SET UP TO ANSWER QUESTIONS, I ASKED
ABOUT THE DUST THREAT TO OUR HOME. THE YOUNG MAN
AT THE TABLE TOLD ME THAT THEY HAD A CHART SHOWING
WIND DIRECTIONS AND FREQUENCY OF WIND FROM VARIOUS
DIRECTIONS, BUT HE REALLY DIDN'T UNDERSTAND IT

(Use back of form if necessary)

The Draft SEIS document is posted on DNR's website at
<http://www.dnr.state.mn.us/input/environmentalreview/essar/index.html>

Public review copies are also available at the following locations:

- DNR Library, 500 Lafayette Rd. St. Paul, MN
- Duluth Public Library, 520 West Superior Street, Duluth, MN
- Hibbing Public Library, 2020 E 5th Ave, Hibbing, MN
- Keewatin Public Library, 125 3rd Avenue W., Keewatin, MN
- Grand Rapids Area Library, 140 NE 2nd Street, Grand Rapids, MN
- MPLS Public Library – Tech. and Science, 300 Nicollet Mall, Minneapolis, MN

HIMSELF. WHEN I POINTED OUT THAT BECAUSE OF THE AREA TOPOGRAPHY, THE WINDS FROM THE MINE WOULD BE FUNNELLED TO MY HOME, ALSO I AM SOUTH EAST OF THE MINE SO THE NORTH AND NORTHWEST WINDS, WHICH ARE QUITE COMMON HERE, WOULD BLOW THE DUST RIGHT AT MY HOME. I ALSO ASKED IF THE DUST WOULD STOP AT THE RELOCATED MINE BOUNDARY LINE. IT SHOULD ALSO BE NOTED THAT THE SNOW COVER ON SNOWBALL LAKE WAS COVERED IN RED ORE DUST JUST FROM THE CONSTRUCTION LAST WINTER. I GUESS THAT DUST DIDN'T KNOW WHERE THE LINE WAS. THE BOUNDARY THEY HAVE SET IS FOR THEIR CONVIENIENCE AND ISN'T LOGICAL FROM A PUBLIC SAFETY STAND POINT. GOING BACK TO THE ORIGINAL LINE THAT RAN ALONG HWY. 169 WOULD BE BETTER AND IT SHOULD BE CHECKED TO MAYBE EXPAND FURTHER. ESSAR STEEL WILL NOT DO ANYTHING FOR PUBLIC SAFETY, AS FAR AS I CAN SEE, WITHOUT BEING FORCED. YOU PROTECT FLORA AND FAUNA WITH GREAT TENACITY, WHEN ARE YOU GOING TO PROTECT THE PEOPLE.

Maria Kautto

Oral Comments as transcribed

Public Meeting May 24, 2011

MARIA KAUTTO: Thank you. My name is

15 Maria Kautto. I live at 35249 Lakeview Drive on the east
16 side of Big Sucker Lake. And I am upset, especially when I
17 have been keeping kind of a diary of things that are
18 happening in this project because it's close. I live a
19 mile and a half. I have been told that there's
20 (unintelligible), no problem, things are going to be fine.

21 Well, since then, I have learned a few things.

22 And also, I am very concerned about the road, County 58,
23 being closed, because that's what gets me in and out of my
24 place. And two days ago, we had a meeting, and they told
25 us we could not use that road, and so they built a road in

30

1 the back so we could go around. It adds four or five miles
2 to us. And I think, well, that's the way it is. And
3 somebody said, yes, that's the way it is.

4 I was gone this winter. And when I came back
5 about three weeks ago, we got a letter in the mail from the
6 county board concerning County 58, and I found out that I
7 do have a say in whether this road is going to be closed or
8 not. And that really bothered me, because I feel that the
9 powers that be are lying to us. What's going to happen now

10 is a judge will (unintelligible) next month. We're going
11 to have a meeting, and hopefully we can get to the powers
12 that be and say we're against the closing of this road.

13 Now, I don't have anything against the company.
14 I'm concerned about closing the road. And somebody told me
15 over here it's a safety, for our safety. And I say, if
16 it's for our safety, then, because of big trucks and
17 whatever, they can use the road in the back. Let them use
18 the road in the back. Keep our road open so I can get out
19 whenever I want to.

20 And I just begin to wonder, if we were lied to
21 about this little piddly thing of the road, what is going
22 to happen with the potential environmental effects that are
23 going to be taking place down the road. How is it going to
24 affect my future relatives, our future kids, our future
25 area?

31

1 We're -- We (unintelligible). We're -- I am 'a
2 mile and a half from this project. I'm real concerned,
3 because I think we should all live by the truth and at
4 least be honest. That's the least we can do, not wait 10,
5 12 years down the road, when things are going the wrong
6 way. It's too late then. Might not even be here, but
7 there's other people who should be, certainly.

8 I just got back from a water (unintelligible)

9 in Grand Rapids, at the college, and I wish all of you
10 could have been there to hear about what's happening in our
11 environment. We have good, clean water here. And somebody
12 can tell me this is for (unintelligible) -- I mean, this is
13 for (unintelligible). I'm sorry, it will affect us one way
14 or the other. It's bad enough now, even if the plant isn't
15 there, but heaven help us down the road. Think about it.

16 And somebody said, well, jobs and
17 (unintelligible). My husband used to work for the mine.
18 The mine closed, didn't have a job. He didn't have a job.
19 But is that -- are we at such a mercy of this kinds of
20 place that we're going to close our eyes (unintelligible)
21 anything? I mean, yeah, we want jobs, but we want good
22 jobs. We want -- and we want people to tell us the truth,
23 not lie to us and then, down the road, there we are.

24 Don't forget, maybe all of you live farther
25 than a mile and a half from there, even now we're being

32

1 affected. They're building over there, okay? We do have
2 noise pollution. And, of course, when the plant comes,
3 it's going to be worse. And don't lie to me. One
4 (unintelligible) just told me, don't worry, Maria, the wind
5 blows that way, away from you. I have lived there in over
6 30 years, and the wind blows like this (indicating). It
7 doesn't blow one way.

8 I mean, I'm sorry. I feel sad, but I think all
9 of us should be more concerned about what's going on. I
10 look at it, and I'm going to be thinking about what happens
11 to that road, too, next week during our meeting.
12 Hopefully, the judge will rule in our favor. I do not
13 know. But thank you.



Leech Lake Band of Ojibwe Environmental Department

Levi Brown, Environmental Department Director

*Water Quality Program
Jeff Harper*

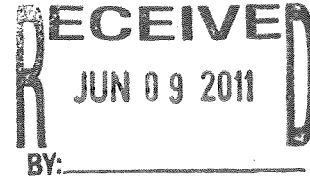
*Air Quality Program
Brandy Toff*

*Brownfield Program
Diane Thompson*

*GAP Program
John Persell*

*UST Program
Sydney Harper*

Lisa Fay, SEIS Project Manager
Environmental Policy & Review Unit
MN DNR Division of Ecological and Water Resources
500 Lafayette Road, Box 25
St. Paul, MN 55155



June 9, 2011

Dear Ms. Faye,

The Leech Lake Band of Ojibwe (Band) is providing comments on Essar Steel Minnesota DSEIS in part as official involvement in the permitting process. However, of greater consequence is the Band's sovereign status and our obligation and ability to protect our people and our environment today and for generations to come. In addition, the Leech Lake Band of Ojibwe has Treatment as an Affected Sovereign/State (TAS) status under Section 106 of the Clean Water Act to protect the health and well-being of the environment and its members by means of protecting wetlands and water resources.

The Leech Lake Reservation is a federally recognized Reservation located in north-central Minnesota encompassing 865,000 acres, serving 8,050 members, and 12,000 Reservation residents. The Reservation is characterized by an abundance of lakes and rivers (approximately 300,000 acres of surface waters), wetlands (163,000 acres), and forests (over 300,000 acres). The Leech Lake Band of Ojibwe retained and exercise their inherent right to hunt, fish, and gather for subsistence purposes in the 1855 Treaty with the United States government. Resources must be available and safe to utilize for the exercise of these rights. Protection of the Reservation's environment and trust resources is crucial for the health and welfare of the Reservation population and the traditional, cultural and spiritual well being of the Band.

The Band is interested in and has been involved in the process of the Essar Steel Minnesota project as it has the potential to impact Leech Lake Band of Ojibwe members and resources both on the Reservation and within the Band's 1855 Ceded Territory. The project is 28 miles from the Reservation boundary, well within the 50 mile TAS radius. Emissions from this project and the facilities around the Essar mining operation affects areas where Leech Lake Band members hunt, fish, gather, recreate, and live.

*Only when the last tree has been cut down;
Only when the last river has been poisoned;
Only when the last fish has been caught;
Only then will you find that money cannot be eaten. - Unknown*

Below are several points regarding SEIS sections addressing water and water resources that we feel need clarification, further consideration or possibly revision.

Section 4.1.2.1.1

What is current water chemistry of water planned for dewatering? Even if there are no pollutants from this project added to the surface waters identified for dewatering, there are two considerations that generate downstream effects—current water chemistry and increased flow rates. Higher water flows will have impacts on erosion rates, and subsequently downstream sedimentation rates which will in turn affect habitats.

Section 4.1.3.1.2

The water quality monitoring protocol associated with wild rice studies that is described on page 3 of the June 15, 2010 Technical Memorandum *Essar Minnesota SEIS –Wild Rice Surveys and Water Quality Monitoring Protocol* (Barr Engineering 2010c) would have been nice to see here or as an appendix for easier reference. The third paragraph in this section hardly constitutes providing full information on this topic in the SEIS; makes it tough to provide good commentary too.

Section 4.1.3.1.3

So the existing permit is set to expire in 2012 and there will not have been sufficient time in operations for the conditions set forth in the existing permit to be complied with and yet the only reference to addressing this vis-à-vis the new needed permit is the single line: “The special conditions and monitoring requirements would be evaluated by the MPCA for the next permit reissuance.”

Given the amount of preparation that goes into an NPDES/SDS permit application and issuance it is fairly difficult to believe that there has not been some significant discussion if not negotiations or agreements already undertaken between Essar and the MPCA to address this very issue. Such details would be good to provide here in conjunction with the paragraphs from the current permit that were presented.

Section 4.1.3.2.1

Paragraph 2, line 1 mentions a Stream Augmentation Plan needing to be completed 1 year prior to the completion of dewatering of Pit 5 and the Draper Annex Pit; when is that anticipated to be?

Paragraph 2, last line and paragraph 4, last line both refer to plans beyond year 15 regardless of closure or continued operations. This is both good to read and disconcerting.

*Only when the last tree has been cut down;
Only when the last river has been poisoned;
Only when the last fish has been caught;
Only then will you find that money cannot be eaten. - Unknown*

Good to read because the initial sense is of Essar going above and beyond merely their planned operations as far as addressing water appropriations needs; disconcerting because it not only leaves the door open for continued/future operations it is easily read as foreshadowing events to come—and longer term operations considerations do not appear to be addressed elsewhere with regard to environmental impacts.

How far into the permitted and planned 15 year operations will Essar decide whether or not they are closing or continuing? What plans are in place for studies to show potential longer term effects on the environment if operations are continued? If extending operations past 15 years is a real potential in Essar's perspective, where are the longer term model and studies results? With as well planned an enterprise as Essar appears to be, it is very difficult to fathom that even 15 years out such studies are not being conducted.

All in all the sections directly addressing water issues read as very complete; the several references back to the original FEIS were problematic since said document was not on hand to refer to, however the cross-referencing is beneficial.

Of concern remains the issue of longer term operational impact on those aspects that have been looked at for the current planned operational time frame.

We appreciate the opportunity to comment on the Essar Steel Minnesota SEIS. Please do not hesitate to contact me if you have any questions or comments at 218-335-7443 or by email at smalloy@lldrm.org. Thank you.

Regards,

Sam Malloy
Water Resource Technician
Environmental Department
Division of Resource Management

CC: Levi Brown, Leech Lake Environmental Department Director
File

*Only when the last tree has been cut down;
Only when the last river has been poisoned;
Only when the last fish has been caught;
Only then will you find that money cannot be eaten. - Unknown*



Leech Lake Band of Ojibwe Environmental Department

Levi Brown, Environmental Department Director

*Water Quality Program
Jeff Harper*

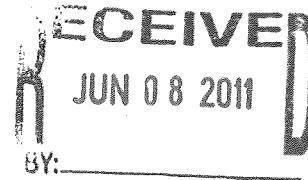
*Air Quality Program
Brandy Toft*

*Brownfield Program
Diane Thompson*

*GAP Program
John Persell*

*UST Program
Sydney Harper*

Lisa Fay, SEIS Project Manager
Environmental Policy & Review Unit
MN DNR Division of Ecological and Water Resources
500 Lafayette Road, Box 25
St. Paul, MN 55155



June 8, 2011

Dear Ms. Faye,

The Leech Lake Band of Ojibwe (Band) is providing comments on Essar Steel Minnesota DSEIS in part as official involvement in the permitting process. However, of greater consequence is the Band's sovereign status and our obligation and ability to protect our people and our environment today and for generations to come. In addition, the Leech Lake Band of Ojibwe has Treatment as an Affected Sovereign/State (TAS) status for locally issued air quality permits and strives to protect the health and well-being of the environment and its members by means of protecting air quality.

The Leech Lake Reservation is a federally recognized Reservation located in north-central Minnesota encompassing 865,000 acres, serving 8,050 members, and 12,000 Reservation residents. The Reservation is characterized by an abundance of lakes and rivers (approximately 300,000 acres of surface waters), wetlands (163,000 acres), and forests (over 300,000 acres). The Leech Lake Band of Ojibwe retained and exercise their inherent right to hunt, fish, and gather for subsistence purposes in the 1855 Treaty with the United States government. Resources must be available and safe to utilize for the exercise of these rights. Protection of the Reservation's environment and trust resources is crucial for the health and welfare of the Reservation population and the traditional, cultural and spiritual well being of the Band.

The Band is interested in and has been involved in the process of the Essar Steel Minnesota project as it has the potential to impact Leech Lake Band of Ojibwe members and resources both on the Reservation and within the Band's 1855 Ceded Territory. The project is 28 miles from the Reservation boundary, well within the 50 mile TAS radius. Emissions from this project and the facilities around the Essar mining operation affects areas where Leech Lake Band members hunt, fish, gather, recreate, and live.

*Only when the last tree has been cut down;
Only when the last river has been poisoned;
Only when the last fish has been caught;
Only then will you find that money cannot be eaten. - Unknown*

Below lists the air concerns we feel need further review, explanation, or revisions to the current language of the Essar SEIS:

- Without the engineering calculations of the quarter scale model it is difficult to fully address some of these air issues as they directly relate to the model's outcome:
 - This has an effect on the Regional Haze concern not just for the Class 1 areas but for the Tribes and Ceded Territories. We support the FLMs in their effort to ensure that the whole project does not degrade the local Class 1 areas.
 - Will the model be able to comply with standards to bring the whole project, not just the taconite plant, to model for Regional Haze compliance? Say for instance that the model does not bring down the values enough to show compliance with the two Class 1 areas, what strategy will be used to revisit the whole facility and decrease emissions from other facility sources?
 - This affects mitigation. The current strategy hasn't changed since Minnesota Steel's original EIS five years ago. With all the changes in operations, SEIS and permits we would like to see the mitigation strategy updated to reflect the proposed operations.
- Though we understand that the BACT is not wholly part of the SEIS, the SEIS does have a potential impact on it. The LLAP is concerned that BACT for the DRI is over five years old and may not truly be BACT anymore. We understand that this may not be able to be changed unless the original DRI proposal is changed. This however is also contingent upon the model calculations.
- We appreciate the use of the larger hauling trucks and would like to encourage Essar to ensure that these vehicles have the latest technology for diesel emission reductions.

*Only when the last tree has been cut down;
Only when the last river has been poisoned;
Only when the last fish has been caught;
Only then will you find that money cannot be eaten. - Unknown*

We appreciate the opportunity to comment on the Essar Steel Minnesota SEIS. Please do not hesitate to contact me if you have any questions or comments at 218-335-7429 or by email at air@ldrm.org. Thank you.

Regards,



Brandy Toft
Air Quality Specialist
Environmental Department
Division of Resource Management

CC: Levi Brown, Leech Lake Environmental Department Director
File

*Only when the last tree has been cut down;
Only when the last river has been poisoned;
Only when the last fish has been caught;
Only then will you find that money cannot be eaten. - Unknown*



Minnesota Center for Environmental Advocacy

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

26 East Exchange Street - Suite 206
Saint Paul, MN 55101-1667

651.223.5969
651.223.5967 fax

mcea@mncenter.org
www.mncenter.org

Founding Director
Sigurd F. Olson
(1899-1982)

Board of Directors
Nancy Speer
Chair

Merritt Clapp-Smith
Vice Chair

Kent White
Treasurer

Bridget A. Hust
Secretary

Peter Bachman

John Helland

Ellen Herman

Douglas A. Kelley

Alexandra Klass

Michael Kleber-Diggs

Mehmet Konar-Steenberg

Gene Merriam

Steve Piragis

Irene Qualters

Peter Reich

Matt Samuel

Don Shelby

Executive Director
Scott Strand

June 1, 2011

Lisa Fay
SEIS Project Manager
Principal Planner
Division of Ecological and Water Resources
500 Lafayette Road, Box 25
St. Paul, MN 55155

Dear Ms. Fay:

I write on behalf of the Minnesota Center for Environmental Advocacy ("MCEA") with comments on the Draft Supplemental Environmental Impact Statement ("SEIS") for the 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. MCEA was active in reviewing the initial proposal for this project. We appreciate the opportunity to offer comments on the modified project and SEIS.

WATER RESOURCES

Section 4.1 of the SEIS discusses the project's impact on water resources and, in particular, wild rice. As noted in our comments from 2007, MCEA is concerned about the water quality impacts of the Essar Steel project. The SEIS makes clear that the project, with the proposed modification, has the potential to result in lasting, degrading impacts on water quality. More information is needed to fully understand the likely lasting effects of the project's water consumption as well as the impacts from the discharge of pollutants. In particular, we are concerned about the following:

1. Availability of Water Resources.

The SEIS notes that the proposed modified project will consume much more water than the earlier evaluated and permitted proposal. However, the SEIS does not evaluate the availability of water resources or assess the impacts of the proposed level of consumption on existing resources. Instead, it defers this for later, after the project is up and running. According to the SEIS, an amended

VIA U.S. MAIL



appropriations permit “will require Essar to conduct a hydrologic monitoring program in order to re-assess their water consumption needs and re-calculate available surface water and ground water yields.”

This SEIS must contain the re-assessment and re-calculation that it seeks to defer. The consumption of water and the availability of water for augmentation to existing water resources is a primary concern raised in earlier comments. (See MCEA Comments on MSI DEIS, April 2, 2007, pp. 2-7)

The Department of Natural Resources (“DNR”) states that “it is not known at this time if there will be enough water in Pits 1 and 2 for 15 years of augmentation.” (4.1-20; *but see* 4.1-7 contending “adequate water sources would still be available to meet the requirements necessary for stream augmentation....”) The DNR must answer the question before moving any further toward approving Essar’s project.

The proposed modifications will consume even more water on a shorter time frame, exacerbating the concern that there was not sufficient water for stream augmentation and that the original models made unwarranted assumptions about water availability. Despite this, the SEIS does not model or evaluate the proposed additional water consumption. This omission must be corrected.

2. Water Management Following Closure And Financial Assurance.

The SEIS acknowledges that the pit water balance under the modified project is substantially different upon closure than what was evaluated in the earlier EIS. It notes, for example, that the time required for Pits 1 and 2 to fill following closure could be “greatly extended.” It notes that “additional modeling would be needed to predict the time it would take for Pits 1 and 2 (and Pit 5 and proposed Pit 6) to fill and overflow....” However, the SEIS states that “this additional modeling was not required to be completed for this SEIS.”

The purpose to the Supplemental EIS is to provide the permitting agencies and the public with sufficient information to evaluate the modified project and its impacts. The consumption of water resources, the availability of augmentation sources, and the long-term impacts on water quality from this project are central environmental concerns. There is no reasonable basis on which to defer modeling of the rate at which the pits will fill and the need for on-going, long-term water management at the site. “The very purpose of an EIS ... is to determine the potential for significant environmental effects *before* they occur. By deferring this issue to later permitting and monitoring decisions, the Commissioner abandoned his duty....” *Trout Unlimited v. Minn. Dept of Agriculture*, 528 N.W.2d 903, (Minn. App, 1995), *rev. denied*, (Minn. Apr 27, 1995). In any case, DNR has not explained why the additional modeling was not undertaken for this SEIS. See Minn. R. 4410.2500.

As MCEA noted in its comments on the original EIS for this project, the Hill Annex pit, which is mentioned throughout the SEIS as an additional source of water, is also the water source for the proposed Mesaba/Excelsior Energy project. The Legislature recently breathed new life into the Mesaba project. <http://www.duluthnewtribune.com/event/article/id/199856/group/homepage/>.

It is not clear from the SEIS whether the Hill Annex pit has sufficient water to sustain both projects and what, if any, other alternatives exist.

Moreover, as acknowledged in the SEIS, the availability of water resources “would affect the cost for closure” and the amount and type of financial assurance that should be required from Essar. Inexplicably, however, the SEIS defers assessment of the likely need for long-term water management and the evaluation of financial assurance for later. This evaluation must be contained in the SEIS. *See, e.g.*, EPA Region 5 Comments on DNR’s PolyMet DEIS, pp 21-22 (rating DEIS inadequate and stating that the DEIS should discuss financial assurance, estimate bond amounts for closure and reclamation, identify responsible parties, and describe contingency reclamation costs).

3. Tailings Basin Seepage.

The SEIS takes an enormous departure from the original EIS, stating that “deep seepage”¹ will average only 183 gpm rather than the 758 gpm estimated originally. The SEIS does not explain where the additional 600 gpm under the modified analysis will go, what effect it will have on the size and stability of the tailings pond, or how the recirculation of additional water (if that is the case) impacts the modeled water quality of the tailings pond water.

4. Mitigations For Ground/Surface Water Contamination Are Inadequate.

The SEIS makes plain that there is a hydrological connection between the tailings basin and surrounding surface waters and that the collection of polluted water in the tailings pond will, in fact, impact the water quality of surrounding surface waters: “All tailings basin deep groundwater seepage is expected to ultimately to reach Swan Lake. Seepage would flow initially to either Pickerel Creek, O’Brien Lake, or directly to Swan Lake.” Moreover, the SEIS states that, for a number of pollutants, the concentration of pollution reaching the surface waters increases under the proposed modified project.

DNR’s SEIS cites the requirements of the Minnesota Pollution Control Agency’s (“MPCA”) NPDES permit as the mitigation for these surface water impacts.

MCEA has reviewed the NPDES permit (MN0068241) and finds that it is wholly inadequate.

Where there is a hydrological connection between groundwater and surface waters and the collection of polluted water results in a point source discharge to surface waters via the groundwater, an NPDES permit is required. *Hernandez v. Esso Standard Oil Co* 599 F.Supp. 2d 175 (D.P.R. 2009), *as modified by* 2009 WL 1586928 (D.P.R. 2009). *Northwest Environmental Defense Center v. Grabhorn, Inc.*, 2009 WL 3672895 *11 (D.Or.); *Williams Pipe Line Co. v. Bayer Corp.*, 964 F. Supp. 1300, 1320 (S.D. Iowa 1997). The NPDES permit must limit pollutants in the discharge, and cannot be issued if the new discharge will cause or contribute to

¹ We find the use of the phrase “deep seepage” confusing and unnecessary given that it includes all seepage from the tailings basin other than “visible” water that collects at the toe of the tailings basin dam.

a violation of water quality standards. 40 C.F.R. § 122.4(d). The NPDES permit cited in the SEIS, which expires July 31, 2012, does not include limits on any of the pollutants contained in the tailings pond water which, the SEIS acknowledges, will reach the surrounding surface waters via the groundwater. In fact, the permit states that it does not authorize a discharge to surface waters of the state with the exception of the discharge of stormwater and mine pit maintenance dewatering flows to the Ann and Sullivan Pits. (ch. 2, ¶ 3.1; ch. 5, ¶1.1) The SEIS, however, makes clear that the tailings pond *will* discharge to surface waters, and the Clean Water Act prohibits that discharge absent an NPDES permit.

The existing permit only requires monitoring of groundwater and surface water impacts. The NPDES permit does not meet the requirements of the Clean Water Act or Environmental Protection Agency's ("EPA") regulations and will not be able to be reissued without the MPCA conducting an analysis of the reasonable potential for pollutants in the tailings pond to cause and contribute to water quality violations and imposing the appropriate limits. 40 C.F.R. § 122.44(d)(1). Moreover, the existing permit, because it does not protect Minnesota's resources from pollution, impairment or destruction, is subject to challenge and invalidation. Minn. Stat. § 116B.10.

Not only does the existing NPDES permit fail to authorize a tailings basin discharge or impose any limits on such a discharge, it fails to provide sufficient authority for requiring mitigations when the discharge occurs. The permit contemplates "corrective actions" that themselves only involve more monitoring. For example, the permit says that "MPCA may require the Permittee to conduct further evaluations of existing geotechnical information, conduct additional geotechnical investigations and/or ground water assessments *to demonstrate the adequacy of the existing ground water monitoring program in assessing water quality impacts.*" (Emphasis added.) Even after the tailings basin is found to cause "adverse changes" to the groundwater, the permit only allows for notice to Essar and a responsive report that "may" consider "additional monitoring, the installation of additional monitoring wells, and/or implementation of other corrective actions."

Meanwhile, the models predict, even with the new assumption of 75% less tailings water seeping into groundwater, that the basin will contribute to the sulfate level in Swan Lake and the Swan River, which already exceed the state water quality standard of 10 mg/L. (The effects of the other pollutants on water quality in surrounding surface waters are not modeled or reported.) Again, the MPCA may not permit a new discharge that causes or contributes to an existing water quality violation. 40 C.F.R. § 122.4(d).

The SEIS must be amended to reflect the requirement that Essar's discharge from the tailings pond to surface waters through groundwater seepage is prohibited absent an NPDES permit. Moreover, the SEIS should explain what limits and terms would be imposed in such a permit to provide real mitigations (i.e., not just additional monitoring) for the expected water quality impacts. DNR is charged with protecting the State's natural resources, including its surface waters and its wild rice. Now is the time to demand that Essar evaluate ways to avoid, reduce, and mitigate the adverse impacts its activities will have on the State's shared resources.

5. Zero Discharge Of Process Water.

The SEIS should explain how the zero discharge system functions and whether/how pollutants are removed from the process water. Is the expectation that water with 10- or 15-years of pollutant accumulation will still be used by Essar in its industrial processes? Is this realistic? What would the chemical balance of such water be? What effect will the reuse of polluted process water have on plant equipment efficiency and functioning?

PSD INCREMENTS AND PM_{2.5}

The SEIS states that the PM_{2.5} increments, promulgated October 20, 2010, will not apply to the project because Essar intends to submit a complete air permit application to the MPCA prior to October 20, 2011. *See* SEIS, p. 4.2-7, fn 2. MCEA does not agree with this assertion.

Section 165 of the Clean Air Act defines the applicability of its requirements based on when construction commences, not when the permit application is deemed complete. *See* CAA § 165(a) (prohibiting the construction of major emitting facilities that do not comply with the applicable permitting requirements where “construction is commenced after the date of the enactment of this part . . .”). Indeed, when Congress adopted the PSD program, it understood that certain sources might get caught by changing permit requirements and it offered specific “grandfathering” relief only to those sources on which “construction had commenced” before the enactment of the 1977 Clean Air Act Amendments. *See* CAA § 168(b); *see Andrus v. Glover Constr. Co.*, 446 U.S. 608, 616-17 (1980) (“Where Congress explicitly enumerates certain exceptions to a general prohibition, additional exceptions are not to be implied, in the absence of evidence of a contrary legislative intent.”); *see also NRDC v. EPA*, 489 F.3d 1250, 1259 (D.C. Cir. 2007).

MCEA understands that the EPA regulation grandfathering compliance with the PM_{2.5} increment is being challenged and is under review. Essar should be required to show compliance with the PM_{2.5} increment, and that information should be provided in this SEIS.

VISIBILITY IMPAIRMENT

The SEIS acknowledges that the modification project will increase the project’s adverse impact on visibility in Class 1 areas. It fails, however, to provide the public with an understanding of the extent of the problem and whether mitigations exist that will allow the project to proceed without having adverse visibility impacts on Class 1 areas.

The visibility analysis is based on the modeled percentage change in light extinction in the Boundary Waters Canoe Area, Isle Royale, and Voyageurs that is attributable to pollution from the Essar facility. It finds that with regard to each Class 1 area, there are one or more days in which the light extinction is increased by greater than 5% due to the Essar project. Indeed, Essar’s pollution will make the haze problem in the Boundary Waters more than 5% worse for nearly an entire month (26 days).

The analysis does not translate the impact back into pollutant amounts, however. The SEIS should provide the public with information showing the level at which no days of greater than 5% contribution to light extinction in Class 1 areas is achieved. How low would NO_x, SO₂, or PM emissions have to be driven down to ensure no adverse impact? What mitigations are available for Essar to achieve this level? What amount of pollutants need to be offset to achieve no adverse visibility impact?

The SEIS states that "Essar would be required to mitigate [the adverse visibility] impacts before MPCA would issue a revised air permit...." While the SEIS mentions some potential mitigation measures, there is nothing specific. The SEIS must identify the level of emissions Essar will have to reduce; it then should evaluate whether and how that level of emission reduction is achievable.

GREENHOUSE GASES AND CLIMATE CHANGE

MCEA appreciates the SEIS's discussion of climate change generally and climate change impacts in Minnesota and the project area, as well as the discussion of how expected changes in climate may affect or alter the project itself and the environmental impacts the project is likely to cause.

MCEA submits, however, that additional analysis and evaluation of mitigations, especially the requirement that emissions be avoided or offset, be seriously discussed and considered in the SEIS.

According to Essar's calculations, the original MSI project would add 3.9 million tons of CO₂-eq to the atmosphere each year. With the proposed modifications, that figure jumps to 4.5 million tons of CO₂-eq per year, an increase of 16%. As noted in the SEIS, avoidance of the most significant adverse effects from climate change will require steep reductions in greenhouse gas ("GHG") emissions; yet, this project proposes substantial increases in emissions.

The SEIS states incorrectly that "[n]o project-specific requirements exist at this time for a cumulative reduction/mitigation." In fact, the point to environmental review is to identify environmental impacts that a project causes or contributes to and then identify mitigations that a permitting authority can translate into requirements. Project-specific requirements that mitigate a project's environmental impacts *do* exist and *must* be implemented by the permitting agencies.

The Minnesota Environmental Policy Act (MEPA), under which this environmental review is conducted, and the Minnesota Environmental Rights Act (MERA) both prohibit projects that cause or are likely to cause pollution, impairment or destruction of Minnesota's environment where feasible and prudent alternatives exist. Minn. Stat. § 116D.04, subd. 6; Minn. Stat. § 116B.10.

Here, the SEIS acknowledges that Essar's project will add 4.5 million tons of CO₂-eq to the atmosphere. It likewise notes that this pollution is contributing to global climate change which is causing and is likely to cause pollution, impairment and destruction of many Minnesota

resources. There are feasible and prudent alternatives to allowing the additional 4.5 million tons of CO₂-eq to be emitted, which include both avoidance and mitigation through CO₂ reductions projects (offsets). Where such options exist, the permitting authorities have an obligation to impose them. This SEIS is where such mitigations should be explained to the public and vetted.

Under Minnesota law, the EIS must “identify those measures that could reasonably eliminate or minimize any adverse environmental . . . effects of the proposed project.” Minn. R. 4410.2300(I). An EIS must “suggest measures which could be helpful in mitigating any adverse environmental impact caused by the action.” *Coon Creek Watershed Dist. v. State Env'tl. Quality Bd.*, 315 N.W.2d 604, 605-06 (Minn. 1982).

While the SEIS discusses air permitting requirements (e.g., the obligation for Essar to conduct BACT for GHGs) and provides examples of efficiency improvements for the facility, it makes no attempt to identify and suggest measures that “could reasonably eliminate” the annual 4.5 million ton CO₂-eq emissions from the project. In particular, the SEIS must evaluate with more specificity GHG reductions that could be achieved through renewable power purchases and carbon offsets.

Essar, as an enormous consumer of electricity, is in a unique position to influence the resource mix of the utility from which it will purchase its electricity. The SEIS should evaluate options in which Essar demands and purchases 100% of its electricity from renewable sources. If not currently feasible because of the existing resource mix of the utility serving the project, other scenarios should be evaluated where an increasing share of the company's electricity is generated from renewable sources, such as wind, solar or hydroelectricity.

The timing of this project coincides with the requirement that Minnesota Power study and diversify the mix of resources it will use to meet industrial customer demand. The state permitting agencies and Essar have an opportunity to influence the rate at which renewables displace existing carbon-intensive sources by requiring and committing to the purchase of electricity from renewable sources.

Additionally, the SEIS should provide detailed information about the availability and suitability of carbon offset credits and projects that “could reasonably eliminate” Essar's direct (scope 1) emissions by reducing CO₂ emissions elsewhere. The market for carbon offset credits is very diverse – not all offsets are permanent, quantifiable, verifiable, enforceable or additional. The SEIS is the document in which the availability of valid offset credits should be evaluated. In addition to offset credit markets, Essar could develop and propose offset projects of its own which “could reasonably eliminate” its proposed new CO₂ emissions, which will cause and contribute to climate change and its adverse effects on Minnesota's natural resources.

In sum, the SEIS's discussion of climate change impacts is a welcome improvement over the original EIS. But it lacks a thorough discussion of what is arguably the most important question an environmental review should answer: How can the permitting authority “eliminate or minimize” the project's adverse environmental impacts. There are ways for DNR to accomplish that here, and they should be discussed and vetted in this SEIS.

Lisa Fay
June 1, 2011
Page 8

CONCLUSION

MCEA appreciates the opportunity to comment on the SEIS for the Essar project. If you have questions regarding any of MCEA's comments, please feel free to contact me. We look forward to receiving the Department's response to comments as well as copies of any proposed permits. Thank you.

Sincerely,



Kevin Reuther
Legal Director

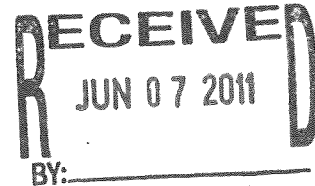
KR/ed

cc: Rebecca Flood, MPCA
David Thornton, MPCA
Don Shepherd, NPS
Ken Westlake, EPA Region V



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



June 8, 2011

Lisa Fay, SEIS Project Manager
Environmental Policy & Review Unit
MNDNR Division of Ecological and Water Resources
500 Lafayette Road, Box 25
St. Paul, MN 55155-4025

Re: Essar Supplemental Environmental Impact Statement (Draft SEIS)

Dear Ms. Fay,

Minnesota Power has reviewed Essar Steel Minnesota's Draft Supplemental Environmental Impact Statement. We'd like to acknowledge and commend the Minnesota Department of Natural Resources (MNDNR) for their thorough environmental review of this Project as demonstrated through the body of work included in the Draft SEIS.

It's clear that the processes in place associated with the planning and public communication of the project provide a great mechanism for obtaining the right feedback. The feedback, combined with a sound plan and appropriate mitigation and management measures will help to ensure that the amended project will be a successful venture and will benefit all Minnesotans.

Minnesota Power acknowledges the significant positive socioeconomic impact to the region already resulting from the Essar project construction, and we realize that a larger mine will provide a greater contribution to the West Range economy and will benefit both the public and private sectors.

Minnesota Power appreciates the efforts of MNDNR in leading their comprehensive review process. We look forward to the completion of the permitting process and eventual issuance of the modified and amended permits in such a manner so as to maintain the responsible stewardship of our precious resources.

Sincerely,

Dave McMillan

Fay, Lisa (DNR)

From: Gary D. Oja [GOja@inclube.com]
Sent: Tuesday, May 24, 2011 11:23 AM
To: Review, Environmental (DNR)
Subject: Essar Steel Minnesota Draft Supplemental EIS

Dear Ms. Fay:

After reading the above supplement I feel that Essar Steel Minnesota has studied the potential significant environmental impacts and their proposed modifications do provide adequate mitigative measures. The additional increase in pellet production will provide more economic vitality to northern Minnesota for years to come.

Thank you.

Gary Oja
Industrial Lubricant Company
218.328.0265

Fay, Lisa (DNR)

From: Elanne Palcich [epalcich@cpinternet.com]
Sent: Friday, June 03, 2011 7:11 PM
To: Review, Environmental (DNR)
Subject: Essar "SEIS"

Lisa Fay
Environmental Policy and Review Unit
DNR Division of Ecological and Water Resources
500 Lafayette Road Box 25
St. Paul, MN 55155-4025

For the public record:

I wish to submit the following concerns regarding the Essar Steel SEIS.

1. How will air emissions that affect Class I areas be mitigated?
2. How will increased pollution of area watersheds be mitigated (especially for sulfates, mercury, and accompanying trace metals)? Area watersheds are already contaminated by current taconite mining. What are the cumulative impacts of adding more such pollutants to the watershed? What technologies are currently available to begin reducing contamination in already impaired waters? What technologies are available to prevent such contamination by the Essar process?
3. How will wild rice be affected?
4. Where will the electricity come from? How will the increased demand for electricity affect citizen electric bills?
5. What water resources will be used, and how will this impact area watersheds, well water, etc.? How will this affect future generations?
6. In light of the fact that Minntac is facing an unsolvable problem in trying to release contaminated recycled water into local watersheds, what mitigation plans have been developed by Essar as part of the environmental review process?
7. How can the amount of CO₂ to be released by Essar be justified when 2011 weather patterns have been so extreme? Why is the SEIS using outdated information when referencing CO₂ impacts?
8. How does monitoring suffice in place of detailed technological information regarding mitigation of environmental impacts? The Iron Range taconite industry began in the 1960's (Pilotac becoming Minntac). We are just now beginning to understand the full scale of environmental ramifications. How is it possible to assume that the Essar project will not adversely affect the environment for future generations?
9. When considering the economic benefits of Essar, was any comparison made between the number of projected mining jobs vs. the number of American jobs that have been outsourced to India? Have any studies been done regarding the impact of exporting our remaining iron resources to foreign countries? Who will ultimately benefit financially when we suffer from a degraded environment?
10. Has the amount of state and local government subsidy to this project been included in the economic analysis?

It is my conclusion that the environmental analysis on this project is not complete, and that total impacts have not been considered.

Thank you.
Elanne Palcich
29 SE 5th St.
Chisholm, MN 55719

June 3, 2011

Fay, Lisa (DNR)

From: Drew [drew@rapidsrental.com]
Sent: Monday, May 23, 2011 4:05 PM
To: Review, Environmental (DNR)
Subject: EIS

To Whom It May Concern,

I have been following the Essar Project fairly closely. I have been to meetings pertaining to the project and read the EIS. To a normal person the EIS looks like it covers all the areas that need to be covered to protect our environment. The company seems to be working well with the State to make sure they follow the recommendations made by the State. I am not naive that they are wonderful environmentalists, but they seem to be working to do what is necessary to protect the environment as necessary. With the State monitoring the whole project seems like a fair balance for everyone. Obviously the project will have impacts on the environment. I feel the economic impact the project will have on the business community and the people working on, at and to support the project will outweigh the environmental impact. We love where we live, but this is a tough place to live if you do not have a good job. This project would provide well paying jobs with good benefits hopefully for a long time.

Sincerely,

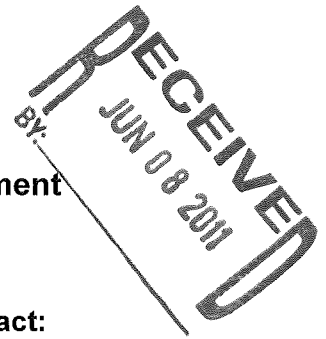
Drew Prochazka
35958 North Moose Point Road
Cohasset, MN 55721

**Ronald R. Rich Comments Concerning:
Essar Draft Supplemental Environmental Impact Statement**

Submitted June 8, 2011 – Via E-mail

For Comment and Request Questions or Clarification Contact:

**Ronald R. Rich – President, Atmosphere Recovery, Inc.
Phone: 952-941-6500 Email: rrr@atmrcv.com**



My name is Ronald R. Rich. I am all of the following:

1. President of Atmosphere Recovery, Inc. – a international company that manufactures and installs advanced technology gas air emission analysis and gas control equipment primarily for iron and steel refining and production processes.
2. An Aerospace & Mechanical Engineering undergraduate of Princeton University with a specialties in fluid dynamics and climate modeling.
3. An Environmental Engineer Master's graduate of Stanford University with specialties in advanced industrial air and water treatment and mitigation processes.
4. Formerly a Minnesota State's "Alternative Energy Project Manager" with direct taconite industry energy and emissions technology and economic experience as part of my duties.
5. Currently considered an international "expert" on conventional and "innovative" iron and steel production methods and emission mitigation technologies.
6. A seasonal resident of Swan Lake, whose area water and air quality would be most degraded by Essar's Minnesota Project.
7. A director of the Swan Lake Association.
8. A concerned citizen who has repeatedly commented on the inaccurate or incomplete information used during the development of the Minnesota Iron and Steel EIS, and the scope of Essar's SEIS.

To date most of my MIS and Essar related EIS concerns appear to have been dismissed without appropriate consideration. This time, even if the DNR does not agree with my concerns, I would appreciate full and complete responses to each issue I raise. And if there is any potential confusion about what I may be saying that gives reviewers any excuse to ignore the comments, please contact me first for a more detailed explanation or clarification.

General Comments:

Compared with the previous MIS FEIS, Essar apparently proposes to nearly double the size of the taconite mining and production operation (7.0 mmtpy/3.8 mmtpy = 1.84 times) and keep the size of the steel production operation the same. And Essar proposes to (at the least) increase the total amount of ore mined and thus the amount of tailings and other solid and hazardous waste permanently needing disposal by 40% (1.84 x 15 yrs/20 yrs = 1.38 times).

In some cases the near doubling of the taconite mining/production operations reflect what appear to be proper relative resource consumption and emissions.

However, in many cases the large increase in planned size does not reflect a proper increase and in some cases, indicates a planned decrease in such resource use and emissions without appropriate or sometimes any explanation. I will focus on one clear concern in detail – and for this issue I request a very specific and detailed response. I will briefly summarize other major issues which in my opinion have not been addressed in the DSEIS either.

1. Electric Energy Consumption and Resultant Air Emissions Calculations:

The DSEIS states: “Essar reports that energy conservation measures identified during detailed engineering have greatly reduced the electricity demand per ton of pellet. As a result, the incremental increase in electricity required for the increased pellet capacity is 35 MW, which represents only a 10% increase in electricity demand compared to the original MSI project.”

The DSEIS also states that the power will come from “existing” electric power plants. And further assumes that the increased air emissions from the “existing” power plants have no impact on the Essar DSEIS emissions.

These two assumptions drastically reduce the actual air emission and climate change estimates that otherwise would be made by the DNR. And they are both wrong.

And nowhere in the DSEIS documentation is the new total electrical energy consumption delineated or the proposed new total of the estimated electrical consumption summarized.

The original declared electrical power requirements in the MSI FEIS was 450 MW “from existing sources”. Based on public meeting responses I asked, 250 MW was estimated to be used by the MIS mining and taconite pellet production portion of the project. And the remaining 200 MW was estimated to be used by the “steel mill” portion of the project.

Essar seems to attribute no energy savings to the steel mill portion (however in the appendix there is a trivial “0.23 MWh per metric ton of steel throughput” reduction declared).

So even though the “crude ore” and taconite production would increase by 84%, Essar’s claimed mining/taconite electric energy use would increase by only $((250 \text{ MW} + 35 \text{ MW})/250 \text{ MW} =) 14\%$. Or another way to view the claim, the electric demand would drop from $(250 \text{ MW}/3.8 \text{ mmtpy} =) 65.8 \text{ MW/mmtpy}$ to $(285 \text{ MW}/7.0 \text{ mmtpy} =) 40.7 \text{ MW/mmtpy}$ – a drop of 38%. An extremely large and unrealistic drop.

Without the Essar claimed savings, the proportional increase in electricity use would average $((1.84 \times 250 \text{ MW}) - 250 \text{ MW} =) 210 \text{ MW}$. But they claim 35 MW. So they must claim to “save” $(210 \text{ MW} - 35 \text{ MW} =) 175 \text{ MW}$ from what they would otherwise need. At 8760 hours per year of operation (unlikely, but most favorable to Essar) that would mean they should prove they can save 1,533,000 MWh per year.

The only apparent supporting documentation for such a massive overall electric reduction is provided in the appendices by statements that “Essar Engineering has calculated...”. There was no independent or DNR assessments of the actual energy needs were made.

Without apparent critical review (as I requested in my SEIS scoping comments) Essar claims to reduce energy usage by:

1.8 kWh/ton of crude ore
10.7 kWh/ton of crude ore
2.0 kWh/ton of crude ore
4.5 kWh/ton of crude ore

A total of 19 kWh/ton of "crude ore" energy savings.

And no electric energy reduction per ton in taconite production is claimed by Essar in the DSEIS appendices.

If the Essar energy savings estimates are being used the DSEIS should provide "crude ore" tons per year on which it is based. But it doesn't. However, there is roughly 30% useful pelletable iron oxide and 70% "tailings" in "crude (taconite) ore". So 7.0 mmtpy of pellets would require about 23 mmtpy of crude ore and result in 16 mmtpy of (dry-basis) tailings for disposal (close to the estimates included in the DSEIS).

Essar's total claimed 19 kWh/ton electric savings is the same as .019 MWh/ton or 19,000 MWh/mmtpy. So using 23 mmtpy estimated "crude ore" mined, this means (19,000 MWh/mmtpy x 23 mmtpy =) 437,000 MWh/yr or only 50 MW of original electric need "saved".

50 MW saved is no where near the 175 MW savings Essar apparently claims and the DSEIS seems to accept.

Worse, Essar claims elsewhere in the DSEIS appendices that it needs 2,649,000 MWh/yr. (or 302 MW average over an 8760 hour year - again being most favorable to Essar). This number is far below the 485 MW implied by the only 35 MW more used by the DNR.

At the very least, all the additional electric energy consumption and use related emissions should be increased by 3.5 times in the FSEIS. And the emissions from the new power plant that will be needed included too.

Hopefully the DNR will go further and conduct an independent assessment of this and other key environmental impact issues for which Essar provides such key data.

Please call me to discuss this issue if you intend to dismiss it without substantive comment.

2. "Low NOx" Burner and Natural Gas Use Assumptions

"Low NOx" burners were included previously "if feasible" in the MIS FEIS. They were deemed to later to be not feasible by Essar. "Low NOx" persists in this DSEIS anyway. And the previous MIS FEIS required NOx offsets which were not actually available for Class I haze compliance.

Two comments:

A. Even though emission savings from them is assumed, the DSEIS does not appear to require Essar to use such burners. If the DNR is going to assume "low NOx" burner use, the FSEIS must require Essar to do so or the massive increase in NOx will drastically decrease the possibility of Class I and local Class II air compliance.

B. Aker indicates a fuel "penalty" of 30% to make the application of Low NOx LE burners viable. Natural gas burner efficiency is always reduced when "low NOx" burners are used. Yet the DSEIS seems to assume decreased natural gas emissions per ton than otherwise expected. I cannot

determine in the DSEIS on what basis this value is calculated. Essar's proposed 84% taconite production increase, with lower taconite natural gas burner efficiency and the same DRI steel mill should result in GHG (and also criteria pollutant) increases over the MIS FEIS of at least 60%. Yet the total increase appears to be only (4.5 mmtpy/3.8 mmtpy =) 18%.

The basis for this discrepancy should be explained in detail in the FSEIS. If the information was provided by Essar, an independent review of all their energy data appears necessary.

3. Taconite Tailings Dust and Swan Lake Water Quality Concerns

The DSEIS states: "The tailings basin height and footprint would increase to accommodate additional tailings disposal; these changes would not extend beyond areas previously considered for disturbance and would not result in additional wetland impacts or other land cover changes beyond those estimated for the original MSI project."

This statement ignores the significant increased impact an expanded tailings basin will have on the surrounding area air and water quality. The MIS FEIS tailings basin height was calculated to be 70 to 100 feet above the existing ground level. An increase of 38% in the amount of tailings in the same drainage footprint would potentially result in a pile of silica containing nanodust well over 100 feet high – well above the surrounding tree line, subject to a much higher wind speed and resulting in a much higher than MIS FEIS estimated fugitive dust emission.

Especially considering Essar's proposed operational scale. MSI proposed to increase the tailings waste in close proximity to Swan Lake by a factor of 11 compared with the previous Butler Taconite tailings volume now disposed on the site. Essar's new proposed volume would be over 15 times greater than Butler's. Yet even the Butler tailings operation seriously affected Swan Lake water quality and resulted in thousands of tons of tailings entering Swan Lake – issues not even considered in DSEIS.

The DSEIS persists in the belief that the Essar claim of "zero water discharge" is true. Water is a significant fraction of the tailings slurry and most evaporates from slurry once deposited. The remainder picks up liberated contaminants from the taconite tailings where they flow into Swan Lake through the groundwater. So Swan Lake's recharge rate is slowed and contamination increases. Ignored in the DSEIS.

Since all water for Essar comes from the Swan Lake watershed and its degradation in quality and loss through evaporation reduces affected natural inflow streams too. The rate of water evaporation that would otherwise feed Swan Lake will increase, resulting in a further decrease in Swan Lake water quality. Groundwater contamination from unlined tailings basin runoff will also be significantly higher.

The expanded tailings discharge rate and lifetime total would cause significant increased impacts for those living around Swan Lake and for Swan Lake itself. They need to be fully quantified and addressed by the FSEIS.

I used to say "please consider my comments". In general they have been dismissed by the DNR. I hope this time a more comprehensive EIS results. Thank you.

(Rec'd 5/24/11)



Comment Form

Essar Steel Minnesota Modifications Project Draft Supplemental Environmental Impact Statement

Comments on the Draft SEIS will be accepted until 4:30, June 8, 2011

Written Comments to:
Lisa Fay, SEIS Project Manager
Environmental Policy & Review Unit
MN DNR Division of Ecological and Water Resources
500 Lafayette Rd., Box 25
St. Paul, MN 55155
Fax: 651-297-1500

RECEIVED
MAY 24 2011
BY: _____

Comment From:

Name Elaine Riser
Address PO Box 2 Nashwauk, MN 55769

Our family has lived in Nashwauk since 1939. We are very upset that the pollution will take out healthy and ruin our lives

(Use back of form if necessary)

The Draft SEIS document is posted on DNR's website at
<http://www.dnr.state.mn.us/inp/Environmentalreview/essar/index.html>

- Public review copies are also available at the following locations:
- DNR Library, 500 Lafayette Rd. St. Paul, MN
 - Duluth Public Library, 520 West Superior Street, Duluth, MN
 - Hibbing Public Library, 2020 E 5th Ave, Hibbing, MN
 - Keewatin Public Library, 125 3rd Avenue W., Keewatin, MN
 - Grand Rapids Area Library, 140 NE 2nd Street, Grand Rapids, MN
 - MPLS Public Library – Tech. and Science, 300 Nicollet Mall, Minneapolis, MN

Fay, Lisa (DNR)

From: Jeremy.D.Rodorigo@wellsfargo.com
Sent: Thursday, May 26, 2011 6:03 PM
To: Review, Environmental (DNR)
Subject: Essar

To Whom it concerns,

I support the conclusion that the potentially significant environmental impacts have been adequately studied and Essar's proposed modifications provide adequate mitigative measures for the project to move forward as proposed.

Thank you!

Jeremy Rodorigo

Jeremy.D.Rodorigo@wellsfargo.com

(218) 262-7403 Hibbing

(218) 326-7210 Grand Rapids

(218) 262-6524 Fax

(218) 969-7747 Cell

this message may contain confidential or privileged information. If you are not the intended addressee you must not use, copy or disclose or take any action based on this message or any information herein. If you received this message in error, please advise the sender immediately and delete this message. Thank you for your cooperation.

Charles Ross

Oral Comments as transcribed

Public Meeting May 24, 2011

23 CHARLES ROSS: My name is Charles Ross,
24 and I live at 18990 South Sucker Lake Road. I want to know
25 what the air quality is going to be. My wife has lung

29

1 disease. I want to know who's going to monitor the water
2 in Sucker Lake. The noise, I know the decibels are high.
3 Right now, where I live, it's very noisy. When they were
4 blasting, it rattled the windows on my house. And also,
5 who's going to monitor all of this?

6 You can't tell me that Sucker Lake isn't going
7 to be affected by this plant. I live three-quarters of a
8 mile from this plant, and what's going to happen when
9 production starts? They say there's not going to be any
10 noise. Well, when I first moved up to the lake, I don't
11 know if any of you have ever heard snow fall. Well, I
12 have, and it isn't like that anymore. So that's about all
13 I have to comment. Thank you.

Fay, Lisa (DNR)

From: Bill Thurman [wt@mesabaheating.com]
Sent: Thursday, May 26, 2011 8:02 PM
To: Review, Environmental (DNR)
Subject: Essar SEIS

I support the Minnesota Steel and Essar's design change.

Bill Thurman, Owner of a local small business and chamber board.

Fay, Lisa (DNR)

From: KEN W. [kentw@q.com]
Sent: Wednesday, May 04, 2011 8:48 AM
To: Review, Environmental (DNR)
Subject: ESSAR Expansion.....

YES, this expansion should go through.

Taconite mining and processing has undergone tremendous changes and is environmentally safe. Please allow the permit..... Ken Wainionpaa

Fay, Lisa (DNR)

From: Chris Wright [chriswrightmkd@yahoo.com]
Sent: Monday, May 02, 2011 5:30 PM
To: Review, Environmental (DNR)
Subject: Essar SEIS

Dear Lisa,

I just received the new scoping outline for Essar Steel, I see there are changes to the air quality class 1 Particulates and Visibility. I am aware that there are three houses on our lake that are being bought out by Essar due to the original air quality modeling. How does this effect the rest of us on the lake with an increase in poor air? Will there be new modeling done or are we now going to be included in the zone? Sound, poor air and particulates will be able to travel easily across the lake. This needs to be addressed I am already contending with the noise but refuse to tolerate poor air or particulates to be covering my home. What is the intention of the state going further with this new information? Who will protect the rest of us left here on the lake? I have found it hard to understand how it could effect three houses on the lake but not the rest. Now we are being told the poor air quality will increase, this to me is unacceptable. Please help with any contacts or avenues I need to take to prevent this from affecting my family!

Sincerely Christopher G. Wright
31360 Rocky Shores LN.
Pengilly, MN. 55775
Christopher.G.Wright@USPS.Gov
(218)259-8517