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Re: US Steel request for variance from water quality standards

I attended the MPCA hearing in Virginia on US Steel's request to continue its sulfate standard variance. I want to commend MPCA and staff for presenting information in a methodical fashion and for giving audience members a chance to register their opinions. I realize that people who are engaged in mining will always make economic and "way of life" arguments related to standards, whether they involve health and safety of workers or the safety of our environment. I have watched this unfold since moving to the area in 1980. Having served on a different public board where waivers and variances were often requested and evaluated, I was reminded of the administrative rules related to such variances. I want MPCA to follow its rules as much as I want mining companies to be good environmental stewards. Historically, MPCA has listened to mining companies and has granted variances. It is telling that the EPA is now demanding that standards be enforced, forcing MPCA to make difficult and unpopular decisions.

It is my understanding from the presentation and subsequent discussion that US Steel admitted in its application that implementing the standard is possible and that they could do that by the 2030 deadline. Yes, per ton prices of taconite will increase, but US Steel stated it could be done and that they would still maintain profitability. I am also aware of the specific guarantees made by Nippon Steel when purchasing US Steel related to Keetac operation. It seems to me that 10 years is a healthy amount of time to keep Keetac open and functioning (for an additional 5 years) within discharge permit requirements. It is the foot-dragging by a company (that routinely pleads poverty while making shareholders and CEO's wealthy) that frustrates all of us.

Now to the anti-science arguments. Discoveries in science are always based on prior research. We still use penicillin (discovered in 1928) and insulin (discovered in 1921) and countless other research-based discoveries that are decades old and that have changed lives. We knew in the late 1960's that sulfate effluent impacted wild rice and other aquatic species. Subsequent research has only supported the consequences of ignoring science in favor of economic arguments. Janet Keogh's presentation highlighted the science conducted on sulfate effluent and its impact on aquatic environments, through the Water Quality Research Laboratory in Duluth. John Pastor's careful UMD/NRRI research on pollution and wild rice health is evidence that the "old" standard is the correct standard. Science has also given us alternatives for sulfate

reduction and mitigation. I ask that MPCA pay attention to promising future solutions based in science when deciding to enforce the standards.

Lastly, I want to address treaty violations. Tribes in Minnesota gave up land for promises. These treaties are important in maintaining indigenous ways of life, but also because they protect the non-natives from the environmental and health impacts of unfettered pollution. I was born in Mahanomen and even as a child I knew the importance of wild rice, fish, and wildlife to native people. I did not understand the sacredness of wild rice until adulthood, but I have learned that we need to honor our treaties and the values associated with the agreements tribes made 171 years ago. The treaty area is substantial and encompasses the Iron Range of our state. I don't want to see a situation where once again, the tribes have to sue for the rights that were granted by this treaty but infringed upon by non-native people and their commercial interests. As a state, we need keep our word. In my world, a treaty that is almost two centuries old trumps mining interests which began in 1884, with the Soudan mine, and which have morphed into an industry reliant more and more on natural resources for production.

Please deny US Steel's request for a variance of such an important standard.

Jane Hovland