

My name is Jeremy Smolich, I am writing as a former U. S. Steel Keetac manager, a current manager of a Hibbing manufacturer, and a proud lifelong resident of Minnesota's Iron Range. I support Keetac's request for a complete variance or encourage the Minnesota Pollution Control Agency to consider an alternate form of variance for the Keetac NPDES permits MN0055948 and MN0031879.

I attended the September 3 MPCA public meeting in Virginia. I was proud of the unified voices in the majority at the meeting that supported a variance to these two permits. Rarely do Steelworkers, Building Trades, Democrat and Republican Representatives or Senators, School leaders, City and County leaders along with businesses agree on one subject. It was clear on September 3 that all these groups support the Keetac employees, their jobs and U. S. Steel's request for a variance to the NPDES permits.

For generations Iron Range residents, community leaders and businesses have worked hard to ensure we have good paying jobs, quality learning institutions, safe communities, and a clean environment. I fear three of these things may be in jeopardy if Keetac is not granted a variance for the permit. Additionally, there are no guarantees that the fourth one, a clean environment, will be preserved or improved upon if Keetac is forced to treat the water discharge to reduce sulfate levels entering Hay Lake.

We all have a sense of responsibility for our community. Iron Range mining companies have significantly contributed to the favorable life quality we experience in northeastern Minnesota. For years, the mining companies have installed equipment for compliance and improvement to their processes to reduce energy, comply with BACT, MACT, NOx reduction, mercury reduction, wetland abatement, and several others. However, complying with an unattainable sulfate standard may be the economic end to mining at Keetac and eventually all mining in northeastern Minnesota.

Some people would like to see mining end. However, most of those voices come from towns and cities nowhere near Keewatin, Hibbing, or Virginia. It saddens me that others voice their displeasure with what we do and only want barriers in place to make living in northern Minnesota more difficult.

For twelve years I have managed a wear parts manufacturer in Hibbing Minnesota that builds products for mines throughout North America. We employ about 120 local people with an annual payroll of \$8,000,000 in addition to providing excellent health care and good retirement benefits. We are one of many companies that are part of the Iron Mining Association that need our local mines to remain competitive in the world market. Without the mines our companies and jobs will not exist.

Like several people at the September 3rd meeting, I too have spent time in a canoe on an autumn day harvesting wild rice from Minnesota lakes and streams. I know like countless other wild rice harvesters that there are many factors that contribute to the quality of the annual harvest. It's commonly observed that lakes that have no mine or municipality discharge have good harvests for some years and poor harvests other years. Wild rice is a resilient grass and will provide a good harvest when the environmental factors align. Sulfate cannot be blamed as the sole cause of a poor annual harvest.

During the public meeting John Arbogast, from the USW District 11, shared a quote during the comment period. "I have spoke to the last three MPCA Commissioners, who have been appointed by Minnesota's last three governors about sulfate and its effect on wild rice. I asked all three commissioners if we had sulfate levels at 10ppm or less in our wild rice waters, will wild rice flourish?" John stated that all three of the Commissioners answered, "I don't know." That statement alone should support that the State of Minnesota and the MPCA should look at a different approach than science from the 1940's.

I suggest that the MPCA and Keetac work together to complete project that can be measured and improve wild rice habitat. Consider wild rice habitat mitigation as an option for a variance requirement? Example; Currently when development occurs that impacts wetlands, developers are to aim for "no net loss" of wetlands. Realizing avoidance and minimization are preferred. Compensation or mitigation is an option. Could an alternative to treating the sulfate level be that Keetac physically improves the wild rice habitat in the Hay Lake area, improve marginal wild rice habitat, or create new wild rice habitat in an area that has been compromised? I suggest wild rice mitigation be considered as an alternative for meeting an "observation" from the 1940's.

Thank you,

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