

Online Comment

Permit Portal: Air

2/8/2018

Comment:

Dear Commissioners Landwehr and Linc Stine, Today, I write in support of the NorthMet project's major draft permits under review, and urge DNR and MPCA to move forward with their issuance. As the elected Member of Congress representing the proposed NorthMet project site and its surrounding communities, I have a longstanding interest and involvement in its development and progress. I also wish to commend both of you and your agencies on the extensive work and open process that has led to the ongoing comment period and public meetings being held in northeastern Minnesota. As both of you are well aware, these draft permits follow a decade of extensive and thorough environmental review that successfully determined the NorthMet project could move forward to this next stage. Under public review and comment today is the "fine print" spanning thousands of pages outlining how PolyMet will comply with strict state and federal laws that protect and ensure the quality of our region's precious waters and air. Below are my specific views on these permits and why I believe they should be issued to help power the next generation of mining on the Iron Range. The Draft Permit to Mine (PTM) contains a comprehensive summary of the project, the mining and reclamation plan, environmental and natural resource management and protection, and PolyMet's proposed approach to financial assurance. It also describes in detail specific regulatory standards governing various aspects of the project and the basis of design and/or operational protocols that PolyMet will use to meet these requirements. The issuance of a PTM will bolster Minnesota's efforts to diversify its mineral economy through long-term support of mineral development, production, and commercialization as set forth in Minnesota Statutes. Additionally, consistent with the policies set forth in Minnesota Rules, the project will promote the orderly development of nonferrous metallic mineral mining by using mining and reclamation best practices to minimize and mitigate adverse environmental effects and to preserve and protect natural resources through each phase of the project. The NorthMet Draft Air Permit (13700345-101) contains the specific parameters PolyMet will comply with to ensure operations from mining and processing comply with the Clean Air Act and additional state-specific air requirements. The draft permit demonstrates that adjacent National Parks and Wilderness Areas – which are subject to more stringent air quality requirements – will not be negatively affected by the operation of the project. The NorthMet Draft Water Quality Permit (MN0071013) is a draft National Pollutant Discharge Elimination System /State Disposal System (NPDES/SDS) permit to construct and/or operate wastewater treatment facilities and to discharge into waters of the State of Minnesota. It contains the specific parameters PolyMet will comply with to reduce pollutant levels in point source discharges and protect water quality in accordance with the federal Clean Water Act (CWA), Minnesota statutes and rules, and additional federal laws and regulations. After years of modeling and engineering work, PolyMet has shown it will be able to utilize its Wastewater Treatment System to treat and release certain water back into the surrounding environment even cleaner than it was received by using a combination of membrane separation treatment technologies (such as reverse osmosis). This engineering technology is vital to protecting downstream water quality and the Great Lakes Basin. The NorthMet Draft 401 Certification

(MVP-1999-05528-JKA) contains the conditions and monitoring regime PolyMet will comply with in accordance with Sec. 401 the Clean Water Act, which is closely interrelated with protecting wetlands under Sec. 404 of the CWA. To receive this certification, PolyMet has proposed to purchase wetland credits from the Superior Mitigation Bank, which is located in the St. Louis River watershed. PolyMet will also be required by the 401 Certification to monitor surrounding wetlands to determine whether indirect impacts will result from the Project. Collectively, the 401 Certification, individual NPDES, general NPDES, and other permits (including the CWA 404 permit) for the NorthMet project will ensure compliance with state and federal surface water pollution control statutes and regulations. In fact, these draft permits are proof that we have the brains, science and technology to create good paying jobs and protect the environment on the Iron Range for generations to come. Our Nation requires these strategic Minnesota minerals to strengthen our national security and economy, but perhaps one of their most critical uses will be to propel the next generation of “green” technologies in our society. For example, new hybrid cars contain more than 1 ton of iron, steel, copper, nickel, and nickel-based aluminum. Wind turbines contain hundreds of tons of steel and copper – and reduce our air pollution and dependency on fossil fuels. And practically every one of the appliances and devices that power our modern way of life rely on iron ore and precious metals. We have limited choices on how we get these strategic minerals. Though we can recycle a certain percentage, recycling will never be able to take the place of mining – not even by half. Therefore, we are left with two options. Either we can primarily import our strategic minerals from foreign countries with terrible environmental standards and worker protections. Or we can mine them right here at home, where we control the process, create good paying American jobs, and follow the toughest environmental rules and regulations in the world. In my judgement, the latter choice makes the most ethical, moral, and economic common sense. I therefore urge you to finalize these permits and continue the progress we have made to date. Thank you for your review and consideration of my views, and again, for all of your own individual work and that of your agencies on this project. Sincerely, Richard M. Nolan Member of Congress

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Attachments: