

Online Comment

Permit Portal: Air

2/26/2018

Comment:

Dear interested parties, The exhibits at the Aurora and Duluth Polymet Mining Hearings did not show any evidence of stress testing the permits as crafted by the mine sponsoring organizations. The first precaution should be a DNR certified water sample from all wells in the watersheds that could be impacted by mining operations or the disposal of mining by products. This would be a public notice period where residents through out the Minnesota Arrowhead would be able to provide well water samples for testing to be documented PRIOR to mining operations. This establishes a control data base for future comparisons. The program would be voluntary. Residents would have to comply with certain measures to meet a control standard for certification PRIOR to mining operations. Second, the "stress test" of all permits should be accomplished using Monte Carlo Simulation where variables, probabilities, and the costs in extreme events would show the likelihood of a disaster in the mining operations. This information is likely in use by the environmental insurance underwriters. These insurance measures were available at the exhibit hall. However, no stress test evidence was present. Also, the insurance underwriters were unwilling to insure the project for the extremes and probabilities of a Monte Carlo Simulation. That is because the likelihood of a mining disaster, from which no recovery is possible to achieve the pre-disaster level of environment, could occur. In summary, residents would have pre-mining data certification of their well water for post mining comparisons. A voluntary program. Monte Carlo Simulation would show, in understandable probabilities, the likelihood of a mining failure. This stress test shows due diligence rather than untested acceptance of a insufficiently bonded mining operation. Paul F. Renneisen 954-812-2674

Paul Renneisen
Schroeder, 55613
United States
flight587truth@gmail.com

Attachments: