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July 29, 2008

Mary Jean Fenske
PE Program Coordinator
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520 Lafayette Road North
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Ms. Fenske,

Thank you for the opportunity to comment on the Minnesota Pollution Control Agency's (MPCA) proposed State Disposal System (SDS) Permit MNG3000000—Ballast Water Discharge General Permit. The Iron Mining Association of Minnesota (IMA) is the taconite industry's trade association consisting of the six iron ore mines and almost 200 vendors that supply products and services to the mines. These industries make up much of the economy of many of the communities in Northeast Minnesota employing approximately 15,000 people directly and thousands more in the trades that build new facilities. In some cases Iron Mining is the primary economic foundation of these communities. The production of iron ore is also essential to the United State's security. Minnesota's iron ore makes about 80% of ore within the United States.

Since the only means the mines have to transport and deliver their product to the steel mills in the eastern United States is by the ore boats known as "Lakers" we have a great concern whenever there are challenges to that transportation mode. While there are studies that suggest that rail could be used we think the study is extremely short sighted in the knowledge of the steel facility receiving equipment and of rail service availability. Other considerations such as emissions were not taken into account in those studies as well. Shipping by the Great Lakes is the most economical and possibly environmentally sound method available. That said we also believe protecting the waters of Minnesota is important. Therefore, there must be a balance between environmental protection, economic considerations and review of international and interstate commerce laws to assure competitive disadvantages are not created for industries of Minnesota with other states and countries. To that end there has to be complete and accurate analysis of the information developed; and permit based on sound science and peer reviewed studies rather than theoretical scenarios.

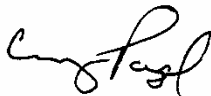
Specific comments to the permit:**Ballast Treatment Systems**

- Requiring ballast water treatment systems by January 1, 2016 does not take into account availability of dry docks. The date of requiring installation has to be based on ability to install equipment.
- To date no treatment technology systems are available to meet IMO Standards.
- Difference in ballast requirements and treatment system technology between ocean going ships (Salties) and Lakers must be accounted for in the permit.
- Difference in the ship designs and operating parameters (Salties/Lakers) must be considered within the permit.

Other Considerations

- The permit must recognize and allow for conflicting requirements of the International Maritime Organization (IMO), US Coast, other states and provinces and other agencies having over-site of shipping.
- Remove duplicative reporting requirements. I.e. both Coast Guard and state. Such requirements from all the Great Lake States and Provinces will be cumbersome and allow for legal mischief while delivering no environmental benefit.

In closing we want to thank you for considering our concerns. We continue to recommend a federal solution to vessel discharge regulations with identical permit requirements across all the Great Lake States and Provinces of Canada to assure economic disparity will not occur.



Craig Pagel
President
Iron Mining Association of Minnesota