



The MPCA has proposed a new wild rice sulfate standard. The IMA is concerned with the proposed changes in this rule because:

- It is uncertain if wild rice will be more abundant if the proposed rule is implemented.
 - In a March meeting in northeastern Minnesota, an MPCA official was asked if the new standard and the investments made to comply with the standard would result in more abundant rice. The MPCA official said that based on the research there may be no benefit to the wild rice species.
- There is only one real treatment option.
 - Reverse osmosis is the only treatment solution for wastewater discharging in the general vicinity of wild rice.
 - Reverse osmosis systems are costly to install and maintain.
- There are dramatic costs to local communities, residences, and businesses
 - Indianapolis complied with new wastewater treatment standards by installing a reverse osmosis system in their wastewater treatment system. This installation resulted in \$160/mo/home increase in water bills.
- This will harm our key industry in Northeast Minnesota
 - Our strongest industry in Northeast Minnesota is iron ore mining. For more than 130 years, this industry has worked in collaboration with many of our communities to build and grow Northeast Minnesota. The proposed rule will cause over \$1 billion in wastewater investments rather than investing in job growth and innovative new projects that will bring the industry into a new decade.
- The proposed standard predicts the wrong outcome up to one in five times.
 - This is unacceptably high for use in establishing a water quality standard.
 - Moreover, it is unacceptable for the MPCA to expect regulated entities and private industry to invest hundreds of millions in treatment technology based on an equation with such a high error rate.