

From: [Joss, Donna](#)
To: [DEP, MiningComments2016](#)
Subject: Comments Concerning Proposed Revision to Chapter 200 Rules on Metallic Mining
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Comments concerning proposed revision to Chapter 200 rules on metallic mining

- **Section 20 Performance Standards.** Section 20(B)(3) has been revised to prohibit the removal of ore, preparation, washing cleaning or other treatment of metallic minerals in or on great ponds, rivers, brooks and streams and coastal wetlands. The prohibition against mining under these resources has been deleted.

As a Maine resident, a mother and grandmother as well as a health-care professional, I am particularly concerned with the last sentence in the above Section (Section 20 Performance Standards) in which it is stated that "The prohibition against mining under these resources has been deleted".

If I am reading this section correctly this means that mining under great ponds, drivers, brooks and streams, and coastal wetlands would be permitted. This is totally unacceptable for several reasons:

 1. It would lead to pollution of these valuable natural water resources with the by-products of the mining processes, which in turn would threaten the health of humans living in Maine.
 2. It would lead to disruption of the natural lives of wildlife creatures who live in and depend on these water resources.
 3. It would lead to visual corruption of the primary natural treasures of the State of Maine.
 4. This in turn would lead to losses of property values, disruption of tourism and loss of income of the many Mainers who depend on tourism for a livelihood. It would also disrupt the quality of life and the health of citizens who have chosen to live in Maine because of the natural beauty of its lakes, ponds and waterways.

I have additional concerns:

Section 1 Definitions: Wet Mine Waste Units: There should be a clear and complete prohibition of wet mine waste units and tailings impoundments. This waste, comprised of arsenic, lead and mercury, is highly toxic and dangerous. Current storage technology does not guarantee safety from the increase in precipitation which will accompany climate change.

Sections 17 (C) (1) and 17 (H): Financial Assurance and Insurance Requirements:

These must include increases for inflation over the entire active life, and post-closure life of any mining operations. Therefore 'may' should be replaced with 'shall' in all wording for these sections, making the ruling independent of any future departmental biases or political influences and interests.

Section 20 Performance Standards Section 20 (L). There must be requirements for the lowest achievable emission rate. Anything more lax than this is unacceptable. Air emissions from mining operations are extremely toxic and can be carried for many miles by winds. They are huge health hazards for humans and animals who breathe the toxic particulates directly, and are known pollutants of water and soil, perpetuating their toxicity for years and years even after mines have been closed.

Submitted by:
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