

39350 Minnesota Pollution Control Agency Dual Notice of Intent to Adopt Rules

Closed Feb 14, 2025 · Discussion · 4 Participants · 1 Topics · 5 Answers · 0 Replies · 0 Votes

4

PARTICIPANTS

1

TOPICS

5

ANSWERS

0

REPLIES

0

VOTES

SUMMARY OF TOPICS

SUBMIT A COMMENT

 5 Answers · 0 Replies

Important: All comments will be made available to the public. Please only submit information that you wish to make available publicly. The Office of Administrative Hearings does not edit or delete submissions that include personal information. We reserve the right to remove any comments we deem offensive, intimidating, belligerent, harassing, or bullying, or that contain any other inappropriate or aggressive behavior without prior notification.

Lee Landstrom · Citizen · (Postal Code: unknown) · Feb 11, 2025 4:08 pm

 0 Votes

1) "A. disposed of by burial, except: ... 8.7 (3) by a person who owns or operates land used for farming, if the waste.... 8.8 treated seed is generated as part of that person's farming operation and is buried on the land..."farming in a nuisance-free, pollution-free, and aesthetic manner". This burial is not a clean practice. The neonic (or other pesticide) covering can still leach into the groundwater. Even with the restriction sighted in lines 8.10-8.23, I fear there will continue to be much more contamination. The rules about disposal must be strict and have consequences and punishments. Individuals must not be allowed to poison the environment for their neighbors and future generations.
2) " 9.11 F. used, donated, sold, or offered for oil processing or for fuel or fuel production, 9.12 except as allowed in Item B". This also sounds like a bad idea. Allowing neonics into fuel that is going to be burned and released into the air?
3) On the Factsheet, I see that treated seed is allowed for wildlife habitat and wildlife feed plantings. Neonics are poisonous to birds and harmful to mammals. They should be forbidden from planting on (leased) wildlife plots. Who cares if the wildlife crops have some insect damage? Keep these toxic pesticides away from public lands!
4) Factsheet: Packaging: rinse water from these bags should NOT be allowed to be applied onto croplands. This water is toxic, too, and will runoff into surface waters.

Laurie Schneider · Citizen · (Postal Code: unknown) · Feb 12, 2025 1:46 pm

 0 Votes

PLEASE SEE ATTACHED DOCUMENT FOR OUR COMMENTS.

Pollinator Friendly Alliance is a conservation organization involved in land restoration and

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environmental work for a healthy Minnesota. Our extensive following is keenly aware of the toxic contamination caused by pesticide-treated seed to our water, land, and plants which cause illness for wildlife and humans. We respectfully submit these comments on MPCA's proposed amendment to rules governing waste treated seed (OAH Docket No. 23-9003-39350). Thank you for developing much needed new rules for the disposal of waste treated seed.

Rosemary Malfi · Citizen · (Postal Code: unknown) · Feb 13, 2025 6:05 pm

👍 0 Votes

The Xerces Society for Invertebrate Conservation and American Bird Conservancy respectfully submit these comments on the waste treated seed rule. Please see the attached document.

Rosemary Malfi · Citizen · (Postal Code: unknown) · Feb 14, 2025 9:31 am

👍 0 Votes

I am submitting the following comment on behalf of Nancy Lee Falkum, member of White Earth Band of Ojibwe. Nancy was unable to log in to the OAH system and has not heard back from the webmaster.

February 13, 2025

The Office of Administrative Hearings
Attention: Judge Suzanne Todnem
600 Robert St. North
St. Paul MN 55101

Re: Proposed Amendment to Rules Governing Waste Treated Seed, Minnesota Rules, chapter 7035, and 7045. Revisor's ID Number R-4806. OAH Docket No. 23-9003-39350.

Dear Judge Todnem,

As a member of the White Earth Band of Ojibwe, I would like to voice my concerns regarding the governing of waste treated seeds (WTS).

MPCA must require a WTS burial setback distance that is greater than 200 feet for private wells of drinking water for animals and humans. How are wildlife creatures to find clean water if we continue to pollute the earth's water with known harmful contaminants such as neonicotinoids!

Regarding best practices for on-farm burial of WTS: The MPCA will have to be very clear about the instructions for this process as the average person must hear or read something 8-16 times before it is fully retained. Please be clear about the quantity of WTS and how thick they can be spread. This must also include plans for future well and septic locations.

MPCA should be clear about wellhead protection areas, karst geology and drain tile locations as to where WTS can be buried.

Consistent labeling of harmful contaminants, such as neonicotinoids, and correct and

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clear instructions for disposal of WTS are necessary. Package information should include the requirement that WTS be disposed of at municipal solid waste land disposal facilities.

Detailed instructions for the removal of WTS that has spilled during transportation or planting must be included. Spring is a vulnerable time for migrating birds and their use of stopover points that might be subject to contamination due to spillage could be harmful or deadly.

Thank you and the MPCA for attempting to keep humans and wildlife out of harm's way.

Sincerely,

Nancy Lee Falkum
White Earth Reservation Enrollment No.408B026986
212 Second Street East
Wabasha, Minnesota 55981
651-565-2360
Guthrie55981@gmail.com

Matthew Berger · Citizen · (Postal Code: unknown) · Feb 14, 2025 3:46 pm

 0 Votes

Please see the attached correspondence that has been sent to Daniel Gonzalez of the MPCA on February 14, 2025.

TO: The Office of Administrative Hearings
Attn: Judge Suzanne Todnem
600 Robert St N, St Paul, MN 55101

February 12, 2025

TO: Minnesota Pollution Control Agency
520 Lafayette Road North, St. Paul, MN 55155

Re: Proposed Amendment to Rules Governing Waste Treated Seed, Minnesota Rules, chapter 7035, and 7045. Revisor's ID Number R-4806. OAH Docket No. 23-9003-39350.

Dear Judge Todnem,

Pollinator Friendly Alliance is a conservation organization involved in land restoration and environmental work for a healthy Minnesota. Our extensive following is keenly aware of the toxic contamination caused by pesticide-treated seed to our water, land, and plants which cause illness for wildlife and humans. We respectfully submit these comments on MPCA's proposed amendment to rules governing waste treated seed (OAH Docket No. 23-9003-39350). Thank you for developing much needed new rules for the disposal of waste treated seed.

We recommend the following six revisions to the proposed amendment:

Definition: Waste treated seed (WTS) is pesticide-treated seed that is no longer needed and is considered industrial waste.

MPCA should require a WTS burial setback distance that is greater than 200 ft for private wells that supply drinking water to humans or animals. As MPCA acknowledges, burial of WTS is the least preferred option for disposal because this can further contribute to surface and groundwater contamination. Neonicotinoids, which are applied as seed treatments to some of Minnesota's most abundant crops (corn, soy, wheat) often end up in waterways. Most of the neonics applied to seeds are *not* absorbed by the growing plants, leaving 80–98% of the pesticides in the soil, where they can then move into surface or groundwater. Neonicotinoids are a pesticide of concern in Minnesota. Given the high solubility of neonicotinoids, and in the absence of good data showing how seed burial (vs. planting) may affect pesticide infiltration of waterways, It is therefore reasonable to assume that seeds buried en masse at a single location only 200 ft away from a water well is not sufficiently protective. MPCA should operate under the precautionary principle and increase this distance; we recommend 1000 ft, which MPCA uses for other water sources. In Minnesota, neonics are a "surface water pesticide of concern".

<https://www.mda.state.mn.us/surface-water-pesticides-concern>

MPCA should prohibit WTS burial on wellhead protection areas. The proposed amendment requires a setback distance of 1000 feet from public water supplies. We would like MPCA to clarify where the setback begins and ends.

MPCA must better define best practices for WTS burial on-farm. If there is a large quantity of WTS that a generator is permitted to bury on-farm, that generator needs information about best practices for minimizing harm to waterways and wildlife. MPCA discusses burial depth and setbacks, but it does not discuss appropriate concentrations of seed per area.

We ask MPCA to track WTS quantities entering the waste stream. If the facility must determine how much waste treated seed it can accept, we presume the facility has to track how much seed they receive in order to know if they are approaching an established cap. It therefore seems reasonable for MPCA to collect information on the amount of seed coming into waste facilities. This information is important for understanding the scale of WTS disposal in MN and whether additional policies are needed to address this waste stream.

We ask MPCA to work with MDA to develop consistent labeling for treated seed in MN as it relates to disposal requirements. As MPCA describes, currently there is no enforceable label for treated seeds and the labels that do exist are often vague and inconsistent. We strongly support the creation of consistent labels for treated seed in MN that convey the state's disposal requirements.

Spilled seed not recovered for planting should be defined as WTS. Observational studies on Minnesota farmland have found that growers are not properly mitigating spilled neonicotinoid-coated seed during the course of planting, directly exposing wildlife to toxic chemicals and underscoring the need for regulations. We recommend classifying spilled seed that is not recovered for subsequent planting as WTS, subject to the disposal regulations developed by MPCA.

We support the following proposed changes in the amendment:

Leaching mitigation. It is declared that waste treated seed (WTS) is classified as industrial solid waste. This means that generators must send WTS to disposal facilities that are equipped with a liner and leachate management to avoid soil and groundwater contamination.

Covering seed immediately. We strongly support the new requirement for mixed municipal solid waste land disposal facilities to place immediate cover on WTS to prevent harm to wildlife, such as birds and deer, that might forage on pesticide-coated seeds.

Composting prohibition. We support the added provisions that clearly state that WTS is categorically excluded from all composting operations, including at mixed municipal solid waste disposal sites.

Prohibited uses and reuses. We support provisions stating that WTS may not be used, donated, sold, or offered for animal feed, and we appreciate the clarification that this applies to wildlife. We support provisions that explicitly prohibit the use of WTS for oil processing, fuel, or fuel production. These regulations are essential for preventing the disastrous consequences witnessed in Mead, Nebraska when WTS was used for ethanol production resulting in byproducts with astronomical levels of pesticides. The byproducts were then spread on local fields as soil conditioners or via irrigation, contaminating the surrounding area and its waterways with harmful levels of pesticides. Community members, pets and wildlife became ill. Cleanup has been costly, and it is taking years to complete.

Open burning prohibition. We support provisions that prohibit open burning of WTS.

Burial prohibition. We generally support the provisions that prohibit burial of treated seed. We find the provision exempting “a person who owns or operates land used for farming, if the waste treated seed is generated as part of... [the farming operation]” to be reasonable because the regulations specifically state that this exemption does not apply if there is reasonable access to “regularly scheduled pickup of solid waste.” However, **MPCS needs to work with municipalities to determine which areas in the state have “reasonable access” and to educate those generators about proper disposal.**

Prohibited burial locations. We support provisions that prohibit WTS burial on karst, wetlands, floodplains, and shorelands. We support the regulations that specify some required best practices for burial (e.g. contouring of the burial site), which help to prevent wildlife poisoning, contamination from runoff, and groundwater infiltration.

We hope you will consider these important rules to keep our water, land, communities, people and wildlife healthy and safe. Thank you for your work.

Respectfully,

Laurie Schneider, Executive Director, Pollinator Friendly Alliance

laurie@pollinatorfriendly.org, 651-503-9904

Attn: Judge Suzanne Todnem
The Office of Administrative Hearings
600 Robert St N, St Paul, MN 55101

Re: Proposed Amendment to Rules Governing Waste Treated Seed, Minnesota Rules, chapter 7035, and 7045. Revisor's ID Number R-4806. OAH Docket No. 23-9003-39350.

Feb 14, 2025

Dear Judge Todnem,

The Xerces Society for Invertebrate Conservation, American Bird Conservancy, and Pollinator Friendly Alliance respectfully submit these comments on MPCA's proposed amendment to rules governing waste treated seed (OAH Docket No. 23-9003-39350). **The Xerces Society** is an international nonprofit that uses science-driven methods to protect invertebrate wildlife and their habitat; we work directly with farmers across Minnesota to safeguard pollinator populations. **American Bird Conservancy** is an international non-profit that seeks to conserve birds and habitats across the Americas. ABC staff work actively with Minnesota agencies and residents to advance bird conservation practices and issues.

First, we want to thank MPCA for the time and effort that went into developing new rules and language that clarifies existing or implied rules governing the proper disposal of waste treated seed in the state of Minnesota. We also appreciate the thoroughness of the explanations for changes laid out in the "Statement of Need and Reasonableness" (hereafter "SNR"). We are largely in agreement with the regulations as proposed and we support how MPCA has defined its regulatory authority to create and enforce the proposed rules (*Justification for Minn. R. 7035.3700, Subp. 5 & Subp. 6, SNR pgs. 34-35*).

- I. We wish to expressly convey our support for the following changes or language clarifications in the proposed amendment:
 - Leaching mitigation. It is declared that waste treated seed (WTS) is classified as industrial solid waste (Minn. R. 7035.3700 Subp. 2, SNR pg. 23). Excluding some generators who may bury WTS on their own farmland, this means that generators must send WTS to disposal facilities that are equipped with a liner and leachate management system (see SNR pg. 27, Minn R. 7035.3700, Subp. 4, Item A, Subi. (1)). This reasonably addresses the concern we raised in our initial public comment about soil and groundwater contamination.
 - Covering seed immediately. We strongly support the new requirement for mixed municipal solid waste land disposal facilities to place immediate cover on WTS (Minn. R. 7035.2815, Subp. 6, Item A, SNR pg. 21) to prevent harm to wildlife, such as birds and deer, that might forage on pesticide-coated seeds. This was a priority concern in our initial comments to MPCA, and we are glad to see this addressed in statute.

- Composting prohibition. We support the added provisions that clearly state that WTS is categorically excluded from all composting operations, including at mixed municipal solid waste disposal sites. (SNR pgs 20-21, Minn R. 7035.2525, Subp.2, Items A &L)
- Prohibited uses and reuses. We appreciate the thought that MPCA put into the need for explicitly stating prohibited uses in the regulations in a manner that is clear to readers (*Justification for Minn. R. 7035.3700, Subp. 4, Items D, E, and F*, SNR pg. 31). We support provisions stating that WTS may not be used, donated, sold, or offered for animal feed, and we appreciate the clarification that this applied for wildlife. We support provisions that explicitly prohibit the use of WTS for oil processing, fuel, or fuel production. These regulations are essential for preventing the disastrous consequences witnessed in Mead, Nebraska when WTS was used for ethanol production resulting in byproducts with astronomical levels of pesticides. The byproducts were then spread on local fields as soil conditioners or via irrigation, contaminating the surrounding area and its waterways with harmful levels of pesticides. Clean up has been costly and it is taking years to complete.
- Open burning prohibition. We support provisions that prohibit open burning of WTS. **We request that MPCA further clarify that waste generated from farms are covered by the prohibition in the statutory language** (Minn R. 7035.3700, Subp. 4, Item B). This restriction is clear in the justification (SNR), but it is less clear in the regulations themselves.
- Burial prohibition. We generally support the provisions that prohibit burial of treated seed (Minn R. 7035.3700, Subp. 4, Item A). We find the provision exempting “a person who owns or operates land used for farming, if the waste treated seed is generated as part of... [the farming operation]” to be reasonable because the regulations specifically state that this exemption does not apply if there is reasonable access to “regularly scheduled pickup of solid waste.” (Minn R. 7035.3700, Subp. 4, Item A (3), SNR pg. 30). **We encourage MPCA to work with municipalities to determine which areas in the state have “reasonable access” and to educate those generators about proper disposal.**
- Prohibited burial locations. We support provisions that prohibit WTS burial on karst, wetlands, floodplains, and shorelands. We support the regulations within Minn R. 7035.3700, Subp. 4, Item A (3) that specify some required best practices for burial (e.g. contouring of the burial site), which help to prevent wildlife poisoning, contamination from runoff, and groundwater infiltration.

II. Below we outline recommended revisions or additions to the proposed amendment for MPCA’s consideration for incorporation into the final rules. These are as follows:

- **MPCA should require a WTS burial setback distance that is greater than 200 ft for private wells that supply drinking water to humans or animals. As**

MPCA acknowledges, burial of WTS is the least preferred option for disposal because this can further contribute to surface and groundwater contamination. Neonicotinoids, which are applied as seed treatments to some of Minnesota's most abundant crops (corn, soy, wheat) often end up in waterways. Most of the neonics applied to seeds are *not* absorbed by the growing plants, leaving 80–98% of the pesticides in the soil, where they can then move into surface or groundwater¹. As a result, neonicotinoids are present in Midwestern waterways throughout the year, often at levels that pose risk to aquatic species^{2,3}. Broader studies across the Midwest have noted elevated pulses of neonics in waterways during crop planting, attributed to seed treatments (Hladik et al. 2014, Berens et al. 2021). Given the high solubility of neonicotinoids, and in the absence of good data showing how seed burial (vs. planting) may affect pesticide infiltration of waterways, it is reasonable to assume that seeds buried en masse at a single location only 200 ft away from a water well is not sufficiently protective. MPCA should operate under the precautionary principle and increase this distance; we recommend 1000 ft, which MPCA uses for other water sources.

- **MPCA should prohibit WTS burial on wellhead protection areas.** The proposed amendment requires a setback distance of 1000 feet from public water supplies. We would like MPCA to clarify where the setback begins and ends. For example, MN Department of Public health [has mapped well protection areas and drinking water supply management areas](#). It is reasonable to prohibit burial of seeds in these areas, especially in areas where the underlying aquifer is at “moderate” to “high” risk of contamination from overlying land use. We ask MPCA to strengthen this aspect of the amended rules.
- **MPCA must better define best practices for WTS burial on-farm.** If there is a large quantity of WTS that a generator is permitted to bury on-farm, that generator needs information about best practices for minimizing harm to waterways and wildlife. MPCA discusses burial depth and setbacks, but it does not discuss appropriate concentrations of seed per area. *Throughout the SNR, the assumption is made that buried seed present no greater risk than seeds planted on the farm. We argue that the level of risk is dependent on the quantity of seed that is being buried, the size of the area over which that seed is buried, and how that seed is distributed.* These aspects of disposal for eligible generators need to be addressed in the final rules.
- **We ask MPCA to track WTS quantities entering the waste stream.** We appreciate the clarification that disposal facility operators accepting WTS must

¹ Alford & Krupke 2017. Translocation of the neonicotinoid seed treatment clothianidin in maize. PLoS One, 12(3):e0173836. doi: 10.1371/journal.pone.0173836.

² Hladik et al. 2018. Year-round presence of neonicotinoid insecticides in tributaries to the Great Lakes, USA. Environmental Pollution 235:1022–1029, doi: 10.1016/j.envpol.2018.01.013

³ Schepker et al.. 2020. Neonicotinoid insecticide concentrations in agricultural wetlands and associations with aquatic invertebrate communities. Agriculture, Ecosystems & Environment 287:106678, doi: 10.1016/j.agee.2019.106678

determine the maximum volume of waste treated seed the facility can accept daily (see SNR pg. 21, Minn. R. 7035.2815, Subp. 11, Item F, (2)). If the facility has to determine how much waste treated seed it can accept, we presume the facility has to track how much seed they receive in order to know if they are approaching an established cap. It therefore seems reasonable for MPCA to collect information on the amount of seed coming into waste facilities. This information is important for understanding the scale of WTS disposal in MN and whether additional policies are needed to address this waste stream.

- **We ask MPCA to work with MDA to develop consistent labelling for treated seed in MN as it relates to disposal requirements.** We fully concur with MPCA's description of the status of treated seed labelling in the U.S. starting SNR pg. 34. The Xerces Society and American Bird Conservancy responded to EPA's Advanced Notice of Public Rule-Making regarding treated seed (Docket EPA-HQ-OPP-2023-0420-0001) and [made several recommendations for label requirements enforceable under FIFRA](#). As MPCA describes, currently there is no enforceable label for treated seeds and the labels that do exist are often vague and inconsistent. They may also be in conflict with the rules established by MPCA. We appreciate MPCA's efforts to get the word out as described on SNR pg. 40 *and* we strongly support the creation of consistent labels for treated seed in MN that convey the state's disposal requirements.
- **Spilled seed not recovered for planting should be defined as WTS.** Observational studies on Minnesota farmland have found that growers are not properly mitigating spilled neonicotinoid-coated seed during the course of planting, directly exposing local wildlife to toxic chemicals and underscoring the need for regulations⁴. We recommend classifying spilled seed that is not recovered for subsequent planting as WTS, subject to the disposal regulations developed by MPCA.

We again thank MPCA for the time and effort invested in developing reasonable WTS disposal rules that can be clearly understood in statute. We appreciate what you have produced and hope the agency will take our recommended improvements under consideration.

Sincerely,

Rosemary Malfi, Ph.D., Policy Director, on behalf of the Xerces Society for Invertebrate Conservation. rosemary.malfi@xerces.org

E. Hardy Kern III, MPA, Director of Government Relations, Pesticides and Birds Campaign, on behalf of the American Bird Conservancy. ehardykern@abcbirds.org

⁴ Roy CL, Coy PL, Chen D, Ponder J, Jankowski M. Multi-scale availability of neonicotinoid-treated seed for wildlife in an agricultural landscape during spring planting. *Sci Total Environ*. 2019 Sep 10;682:271-281. doi: 10.1016/j.scitotenv.2019.05.010.

Rules Governing Waste Treated Seed

Feb 14, 2025

To: The Office of Administrative Hearings

Attn: Judge Suzanne Todnem

600 Robert St No

St Paul, MN 55101

Re: Proposed Amendment to Rules Governing Waste Treated Seed, MN Rules, Chapter 7065 and 7045. Revisor's ID Number R-4806. OAH Docket No.23-9003-39350.

Dear Judge Todnem:

I am an entomologist whose research has involved studying aquatic insects that are bioindicators of water quality. Currently I am also a board member of Pollinator Friendly Alliance, a conservation organization that works on using native plants to restore land, creating healthy habitats for invertebrates, birds, and other wildlife.

Research has reported that some species of pollinators and birds have been declining as the ubiquitous use of pesticides has increased in the last 2 decades. The use of pesticide treated seeds in rural landscapes has led to chemical contamination of soils, drinking water and aquatic habitats as well as causing illness in humans and wildlife.

Wildlife and human health effects associated with neonicotinoid pesticides:

https://ntp.niehs.nih.gov/ntp/results/pubs/rr/reports/rr15_508.pdf

Effects of neonicotinoid insecticides on white-tailed deer:

<http://www.pbs.org/newshour/health/safety-concerns-mount-over-neonicotinoid-pesticides-in-unexpected-places>

I wish to address some portions of the MPCA Proposed Amendment to Rules Governing Waste Treated Seeds(WTS).

Prohibitions for burial of WTS.

If WTS is buried on private property it may contaminate the soil, ground or surface water or be carried to adjacent waterways or properties. The neonicotinoids (neonics) are the most commonly used chemicals used to coat corn, soybeans and wheat seeds, but as much as 90% are not absorbed by the plants and have been frequently documented ending up in the soil and water.

MPCA acknowledges that burial of WTS is the least preferred option, and in MN, neonics are a “surface water pesticide of concern”.

<https://www.mda.state.us/surface-water-pesticide-concern>

Since MPCA uses 1000 ft as the distance required to prevent the spread of neonics used near water, therefore WTS must be buried at least 1000’ from any private wells used for drinking water for humans or animals. In addition, there should be specific clarification of where setback begins and ends for burial on wellhead protection areas.

WTS should never be buried or disposed of in geologically sensitive karst or aquatic habitats such as wetlands, floodplains, or shorelands to prevent any wildlife poisoning, contamination from runoff, or groundwater infiltration.

Kuechle, K.J. et al. Seed treatments containing neonicotinoids and fungicides reduce aquatic insect richness and abundance in midwestern USA-managed floodplain wetlands. Environ Sci Pollut Res 29, 45261-45275 (2022).

<https://doi.org/10.1007/s11356-022-18991-9>

Due to unregulated dumping of WTS on the grounds of at the AltEn Ethanol Plant in Mead, NB in 2021, there were gaseous explosions causing major contamination of the soil, water and air for miles around the plant. In addition, 20 honey bee research hives within 1 mile of the ethanol plant was destroyed. Although mitigation began, there was a 2nd incident that year, and after 4 years of mitigation the plant closed. **MN cannot risk such degradation of our soil, water and wildlife.**

Ethanol from treated seed pollutes Mead, Nebraska:

<https://www.theguardian.com/us-news/2021/jan/10/mead-nebraska-ethanol-plant-pollution-danger>

Therefore, there must be specific allowances for concentrations of seed per acre in order to determine the appropriate scale for WTS disposal in any given facility, and WTS should not be legally used as management options in ethanol production or other fermentation.

There are no current requirements for the labeling of bags of treated seed. The MDA and MPCA should develop clear and consistent labels for proper disposal requirements.

If water is used to rinse out the seed packages, it should not be applied to crops because the rinse water is also potentially toxic to wildlife.

In typical planting operations, there are often leftover and/or spilled seeds, which if eaten by birds or other wildlife may be toxic.

Roy CL,et al. Multi-scale availability of neonicotinoid-treated seed for wildlife in an agricultural landscape during spring planting. Sci Total Environ.2019 Sep 10; 682:271-281.doi:10.1016/j.scitotenv.2019.05.010

Any leftover or spilled treated seeds should be defined as WTS and never be allowed to remain in place, nor be scattered in Wildlife Management Areas as has frequently been done as food for deer. Research in 2019 discovered neonics in 61 % of 799 deer spleens turned in by hunters from across MN.

As long as WTS is classified as industrial solid waste, it must be only be sent to facilities designed with liners for leachate management in order to prevent soil and groundwater contamination.

If there are scheduled pickups of solid waste, with “reasonable access for farm operations”, it seems reasonable that WTS could be safely disposed of in this manner.

All WTS delivered to solid waste disposal facilities must be immediately and securely covered to prevent foraging by wildlife.

In addition, and due to the fact that the neonics and other chemicals may remain the soil for years, WTS should never be permitted in any composting facilities, including mixed municipal solid waste disposal sites.

Open burning of WTS should be prohibited on all public or private landscapes.

Thank you for your important work on this serious topic.

Sincerely,

Margot Monson, entomologist, beekeeper

22 Ludlow Ave

St. Paul, MN 55108

Matthew C. Berger
Also admitted in Iowa
507-354-3111
mberger@gislason.com

February 14, 2025

VIA EMAIL ONLY

daniel.gonzalez@state.mn.us

Daniel Gonzalez
Minnesota Pollution Control Agency
520 Lafayette Road
St. Paul, MN 55155

Re: Waste Treated Seeds – Public Data Request Under the Minnesota Data Practices Act, Minnesota Statutes §§ 13.01 *et seq.*
Our File No. 30970-10

I represent several organizations comprised of agricultural producers throughout Minnesota. On July 19, 2024, I submitted a request to the Minnesota Pollution Control Agency on behalf of these organizations requesting public data under the Minnesota Data Practices Act, Minnesota Statutes §§ 13.01 *et seq.*, related to the agency's regulation of waste treated seeds. After months of delay, the MPCA finally contacted my office (after multiple attempts from our office to contact the agency and get an update on the status of our request) with a request to discuss the scope of the requests. That discussion has occurred. But despite assurances that the MPCA was processing our requests and would be producing responsive data "soon," we have not yet received any data responsive to our request.

Our request was specifically prepared and submitted to obtain information that the organizations I represent intend to use in providing comments during this rulemaking process. And the request was submitted well in advance of the MPCA's publication of the proposed rules and this comment period in an effort to ensure that my clients would have the necessary information at the appropriate time. The agency's failure to timely respond to our request for public data hinders my clients' ability to fully evaluate and comment on the proposed rule. It is not appropriate for the MPCA to push forward with this rulemaking while, at the same time, continuing to withhold public data that is directly related to this rulemaking and that should have been provided to us months ago.

GISLASON & HUNTER LLP

Page 2

Daniel Gonzalez
Minnesota Pollution Control Agency
February 14, 2025

In light of the MPCA's failure to provide a meaningful and timely response to our request under the Minnesota Data Practices Act, I hereby request that the public comment period be extended, or that any public hearing on the proposed rules be delayed or extended, until after the agency fully responds to our information request. Public participation in this process is extremely important, and the agency's failure to timely provide the requested information is directly and negatively affecting the ability of my clients and their members to fully participate in the public comment and hearing process.

If the MPCA is not willing to voluntarily take these actions, we will consider alternative legal or administrative remedies to ensure that my clients and their members are able to exercise their legal rights to fully participate in this rulemaking process.

Thank you for your attention concerning this matter.

Very truly yours,



Matthew C. Berger

MCB:elm

cc: Office of Administrative Proceedings (*via the Rulemaking eComments website*)

RECEIVED

By: OAH on 1/29/2025

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature: _____



Name: _____

Ross Hamre

Address: _____

24100 430th St SW

Beltrami, MN 56517

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature:



Name:

Lane Schwitter

Address:

4040 160th Ave SE

Raymond, MN 56282

RECEIVED
FEB 14 2025
Office of Administrative Hearings

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature: EW

Name: Eric Wilson

Address: 85257 220TH ST
Renville MN 56284

Office of Administrative Hearings

RECEIVED
FEB 14 2025

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature:

Ryan Carlson

Name:

Ryan Carlson

Address:

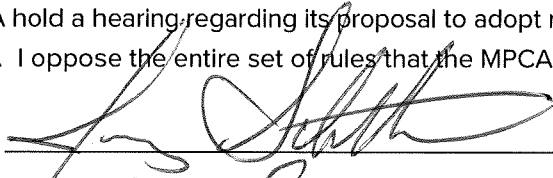
1010 HWY 12 SE

Murdock MN, 56271

RECEIVED
FEB 14 2025
Office of Administrative Hearings

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Signature:



Name:

TERRY SCHWITTERS

Address:

8065 120TH AVE SE

CLARA CITY, MN 56222

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FEB 14 2025

Office of Administrative Hearings

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Signature: Drew Keeler

Name: Drew Keeler

Address: 380 Nathan LN
Chaplin, MN 55310

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Office of Administrative Hearings

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Signature:



Name:

Ben Storm

Address:

1608 Co Rd 142 SE

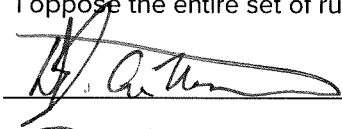
Dover, MN 55939

RECEIVED
FEB 14 2025

Office of Administrative Hearings

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Signature:



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Name:

Doug Manson

FEB 14 2025

Address:

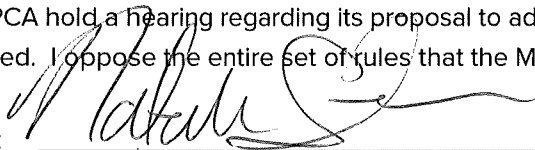
1020 Innovation Lane

Mankato, MN 56001

Office of Administrative Hearings

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Signature:



Name:

Natalie Storm

Address:

1608 Co Rd 142 S

Dover, MN 55929

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FEB 14 2025

Administrative Hearings

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Signature:



Name:

BRIAN WERNER

Address:

200 UNIVERSITY Ave

#901

Minneapolis, MN 55414

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FEB 14 2025

Office of Administrative Hearings

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Signature: 

Name: Joe

Address: Clare City, MN

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FEB 14 2025

Office of Administrative Hearings

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Signature: _____

Name: _____

Address: _____

Jim Kellogg

Jim Kellogg

17353 710th Ave

Isapi MN 55977

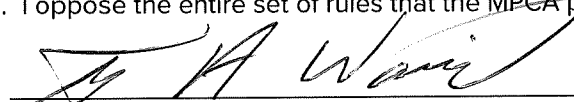
RECEIVED

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Office of Administrative Hearings

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Signature:



Name:

Tim A Warbel

Address:

45438 541 5th Ave
Courtland, MN
56021

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FEB 14 2025

Office of Administrative Hearings

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Signature: Lauren E. Smith

Name: Lauren Senouk

Address: 50415 150th Street
Ostrander, MN 55964

Office of Administrative Hearings

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FEB 14 2025

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Signature: Donna Nelson
Name: Donna Nelson
Address: Grove City, MN

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FEB 14 2025
Office of Administrative Hearings

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Signature: _____

Name: _____

Address: _____

Dale Prokosch
Dale Prokosch
81985 380th Street
Bird Island, MN 55310

RECEIVED
FEB 14 2025
Office of Administrative Hearings

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Signature: _____

Name: _____

Address: _____

JS O'Connor

Jim O'CONNOR

15880 SE 74th AVE

Bloomington, MN 55917

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FEB 14 2025

Office of Administrative Hearings

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Signature: _____

Name: _____

Address: _____

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FEB 14 2025
Office of Administrative Hearings

Chad Willis

Chad Willis

5231 Hwy 12 NE

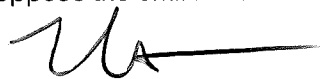
Willmar, MN 56201

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Signature: _____

Name: _____

Address: _____



Nathaniel Hultgren

11996 15th Ave SW

Raymond MN 56282

Office of Administrative Hearings

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FEB 14 2025

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Signature: _____

Name: _____

Address: _____

John H.

John Himle

13908 Emerald Ridge

Mtka, MN

Office of Administrative Hearings

FEB 14 2025

RECEIVED

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Signature: DUNG EPLAND

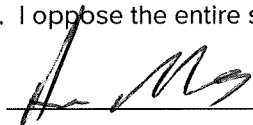
Name: DUNG EPLAND

Address: 107 MAIN ST. W
TWIN LAKES MN

RECEIVED
FEB 14 2025
Office of Administrative Hearings

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Signature:



Name:

Andrew Mages

Address:

4411 17th St S

Moorhead MN 56560

Office of Administrative Hearings

FEB 14 2025

RECEIVED

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Signature:

Krisa Willis

Name:

Krisa Willis

Address:

5231 Hwy 12 NE

Willmar MN 56201

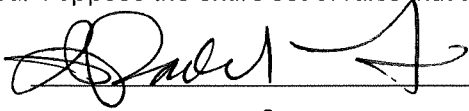
Office of Administrative Hearings

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Signature:



Name:

Rachel Arneson

Address:

505 4th Ave E

Halstad MN 56548

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FEB 14 2025
Office of Administrative Hearings

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Signature: _____

Name: _____

Address: _____



Nathan Green

15162 Highway 66

St. Thomas, ND 58276

Office of Administrative Hearings

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FEB 14 2025

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Signature:

Yape

Name:

Ross Pape

Address:

13285 State Hwy 220 NW
East Grand Forks MN 56721

RECEIVED
FEB 14 2025
Office of Administrative Hearings

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Signature:

Jared Kover

Name:

Jared Kover

Address:

29 Galen Ct NW

East Grand Forks MN 56726

Office of Administrative Hearings

FEB 14 2025

RECEIVED

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Signature:

James C. Nelson

Name:

James C. Nelson

Address:

4567 70th Ave S

Moorehead, MN 56560

RECEIVED
FEB 14 2025

Office of Administrative Hearings

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Signature: Greg Cotton Greg Cotton

Name: Greg Cotton

Address: 304 163rd Ave SE
Hillsboro, ND 58045

RECEIVED
FEB 14 2025
Office of Administrative Hearings

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Signature:

Harrison Weber

Name:

Harrison Weber

Address:

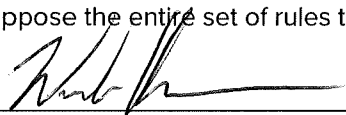
1401 32nd Street SW
Fargo, ND 58103

Office of Administrative Hearings

RECEIVED
FEB 14 2025

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Signature:



Name:

Wade Hanson

Address:

24274 280th St SW
Crookston, MN 56716

RECEIVED
FEB 14 2025
Office of Administrative Hearings

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Signature: _____



Name: _____

Chad Larson

Address: _____

1302 22ND ST NW


East Grand Forks, MN 56721

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature: 

Name: Austin Lessard

Address: 6668 148th Ave NE

Grafton, ND 58237

RECEIVED
FEB 14 2025
Office of Administrative Hearings

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RECEIVED

Signature:

Judy Haag

FEB 14 2025

Name:

Judy Haag

Office of Administrative Hearings

Address:

Eden Valley

55329

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Signature:

Dwight Dahlgren

Name:

Dwight Dahlgren

Address:

73328 190th Street

Dassel, MN 55325

cell

612 201 7751

RECEIVED
FEB 14 2025

Office of Administrative Hearings

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Signature: Robert Hoss
Name: Robert Hoss
Address: 11111 11th
Office of Administrative Hearings

RECEIVED
FEB 14 2025

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Signature: _____

Name: _____

Address: _____

John Adelopp
John Adelopp
8484 135th ST
Kimball MN 55353

Office of Administrative Hearings

RECEIVED
FEB 14 2025

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Signature: Dean E. Nelson

Name: Dean E. Nelson

Address: Grove City Mn. 56243

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature:

Brian Ryberg

Name:

Brian Ryberg

Address:

16659 667th Ave

Buffalo Lake, MN 55314

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature: John F. Gruenes

Name: Jack Gruenes

Address: _____

Watkins, MN

Office of Administrative Hearings

RECEIVED

FEB 14 2025

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Signature: Bradley Minnick

Name: BRADLEY MINNICK

Address: COSMOS MN

Meeker County

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature:

Russell M. Peterson

RECEIVED

Name:

Russ Peterson

FEB 14 2025

Address:

Grove City

Office of Administrative Hearings

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Signature: Brandon

Name: BRANDON FAST

Address: 600 2ND AVENUE

MT. LAKE MN 56159

Office of Administrative Hearings

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FEB 14 2025

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Signature: Bruce Peterson

Name: Bruce Peterson

Address: Northfield MN

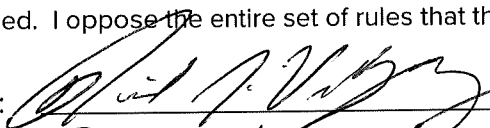
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Administrative Hearings

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Signature:



Name:

David J. VanKloppersburg

Address:

2045 20th Ave SE

Montevideo, MN 56265

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature:

John Maggs

Name:

John Maggs

Address:

38268 Co Rd 175

Belgrade MN 56312

320 248 1908

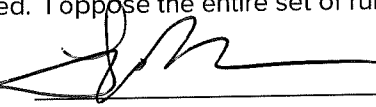
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Signature:



Name:

Les Anderson

Address:

2700 26051
Cannon Falls MN

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature: _____

Angela Guentzel

Name: _____

Angela Guentzel

Address: _____

32172 490th St

Kassota MN 56050

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature: James Kanten
Name: James Kanten
Address: 6070 110th Ave NW
Milan, MN 56242

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature: _____

Name: _____

Address: _____

Dana Allen-Tully
Dana Allen-Tully
1007 Bush Court SW
Evota, MN 55934

RECEIVED
FEB 14 2025
Office of Administrative Hearings

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Signature:

Rob Tate

Name:

Rob Tate

Address:

4325 County 24 Blvd.

Cannon Falls, MN 55009

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature:

Bryan Biegler

Name:

Bryan Biegler

Address:

718 151st St.

Lake Wilson, MN 56151

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature: Wesley A. Bedt

Name: Wesley A. Bedt

Address: 73780 270th Street
St. James MN 56081

Office of Administrative Hearings
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FEB 14 2025

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Signature: _____

Name: _____

Address: _____



Jordan Geblish

30427 Cty Hwy 10

Vesta, MN 56292

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FEB 14 2025

Office of Administrative Hearings

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Signature: _____

Name: _____

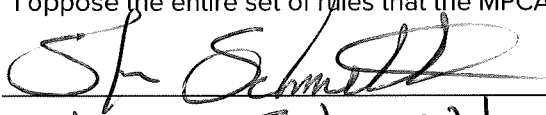
Address: _____

Douglas Scheibe
Douglas Scheibe
76904 US Hwy 71
Olivia MN 56277
dscheibe/66@gmail.com
320 295-6040

RECEIVED
FEB 14 2025
Office of Administrative Hearings

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Signature:



Name:

Steve Schmitt

Address:

PO BOX 240
Eden Valley Mn 55329

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature: Janice Peterson

Name: Janice Peterson

Address: 82641 130th St

Sacred Heart

MN 56285

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature: _____

Gregg Muehler

Name: _____

Gregg Muehler

Address: _____

4403 Blue Stem Way

Moorhead, MN 56560

RECEIVED
FEB 14 2025
Office of Administrative Hearings

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Signature: Tom Haag
Name: TOM HAAG
Address: 16849 Camelot Ln
Elk Valley MN 55329

RECEIVED
FEB 14 2025
Office of Administrative Hearings

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Signature:

Myron D. Petru

Name:

Myron D. Petru

Address:

82641 130th St

Sacred Heart MN 56285

RECEIVED

FEB 14 2025

Office of Administrative Hearings

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature:

Brad Neumann

Name:

Brad Neumann

Address:

29175 230th Street

Wabasso, MN 56293

RECEIVED
FEB 14 2025
Office of Administrative Hearings

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature:

Ed Markowitz

Name:

Ed Markowitz Jr

Address:

Litchfield, Mn

RECEIVED

FEB 14 2025

Office of Administrative Hearings

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature: _____



Name: _____

Brent Baldwin

Address: _____

8244 144th Ave NE

St. Thomas ND 58274

RECEIVED

FEB 14 2025

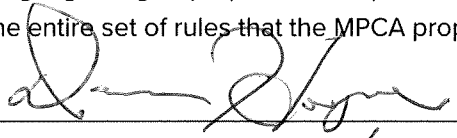
Office of Administrative Hearings

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Signature: _____

Name: _____

Address: _____



DARREN Hognme

321 Elm St.

KONDRED

RECEIVED

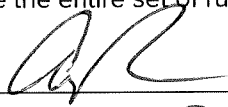
2051

FEB 14 2025

Office of Administrative Hearings

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature: _____



Name: _____

Andrew Ruden

Address: _____

81570 County Road 22

Hector, MN 55342

RECEIVED

FEB 14 2025

Public Hearings

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature: _____

Name: _____

Address: _____

Grant Ascherman

640 Hwy 59 NW

Holloway, MN 56249

RECEIVED

FEB 14 2025

Office of Administrative Hearings

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature: Ben Larson

Name: Ben Larson

Address: 35781 State Hwy 220 S
Climax, MN 56523

RECEIVED
FEB 14 2025

Office of Administrative Hearings

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature:



Name:

Bill LaPlante

Address:

Litchfield MN

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature: 

Name: Pat Sullivan

Address: 66561 Co Rd 5

Franklin mn 55337

Office of Administrative Hearings

RECEIVED

FEB 14 2025

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature: Yuan Adams RECEIVED

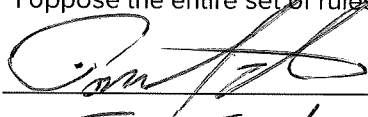
Name: Guan Donkers FEB 14 2025

Address: 8384 230th STE Office of Administrative Hearings

FARIBAULT MN 55021

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature:



RECEIVED

Name:

Tom Frisch

FEB 14 2025

Address:

P.O. Box 145

Administrative Hearings

Dumont, mn 56236

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature: Robert Lindeman RECEIVED
Name: Robert Lindeman FEB 14 2025
Address: 15172 30th St Office of Administrative Hearings
Brownston Mn 55312

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature: _____

Name: _____

Address: _____

RECEIVED

RECEIVED

FEB 14 2025

FEB 14 2025

Office of Administrative Hearings

Administrative Hearings

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RECEIVED

Signature: _____

FEB 14 2025

Name: _____

Kyle Jore

Address: _____

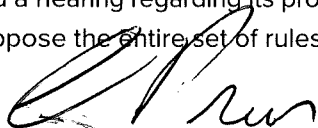
15452 140th St NE

Office of Administrative Hearings

Thief River Falls, MN 56701

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature: _____



RECEIVED

Name: _____

Corey Prins

FEB 14 2025

Address: _____

227 Savannah Heights Blvd
Lynd, MN 56157

City of Minneapolis Administrative Hearings

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature:

Rodd Beyer

RECEIVED

Name:

Rodd Beyer

FEB 14 2025

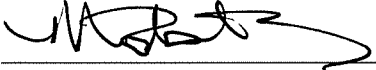
Address:

406 10th St N

Wheaton, MN 56296

Office of Administrative Hearings

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature:  RECEIVED

Name: Mark Roberts FEB 14 2025

Address: 1020 Innovation Lane ~~Room 201~~ Administrative Hearings

Marketo M. 56001

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature: Rose Wendinger

Name: Rose Wendinger

Address: 36399 720th Ave

St. James, MN

56091

RECEIVED

FEB 14 2025

ative Hearings

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature: Andrew Karan RECEIVED
Name: Andrew Karan FEB 14 2025
Address: 36399 720th Ave
Saint James, MN 56081

Minnesota Administrative Hearings

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature:

Theresa D Gillie

Name:

THERESIA GILLIE

Address:

2573 290th Ave

Hallock MN 56728

RECEIVED

FEB 14 2025

Office of Administrative Hearings

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature: Scott Miller

Name: Scott Miller

Address: 46226 Jefferson Shore Dr.

Cleveland, MN 55017

RECEIVED

FEB 14 2025

Office of Administrative Hearings

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature: Rebecca Sip RECEIVED

Name: Rebecca Sip

Address: 2718 Co. Hwy. 19 FEB 14 2025

Ada, MN 56510 Office of Administrative Hearings

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature: Richard Lambert

Name: Richard Lambert

Address: 2926 300th Ave

Hollock, MN 56228

Office
Administrative Hearings

RECEIVED

FEB 14 2025

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature: _____

Drew Lyon

RECEIVED

Name: _____

DREW LYON

FEB 14 2025

Address: _____

1112 N. 4th St

MAKATO, MN 56001

Office of Administrative Hearings

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Signature: Tom Donnay

Name: Tom Donnay

Address: Watkins

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature: Karen Kohl

Name: Karen Kohl

Address: Litchfield

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature: Frank F Marshall

Name: Frank F Marshall

Address: Grove City, MN

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature:



Name:

Lance Piepenburg

Address:

29856 CSAH 31

Litchfield 55355

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature: John Hultersturm

Name: John Hultersturm

Address: 22366 640th Ave

Litchfield, MN 55355

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature: _____

Name: _____

Address: _____

RECEIVED

FEB 14 2025

Administrative Hearings

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Signature: Roland A. Heid

Name: Roland HEID

Address: DASSEL

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature: Tamilee Adolph

Name: Tamilee Adolph

Address: Kimball, MN 55353

RECEIVED
FEB 14 2025
Office of Administrative Hearings

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Signature: _____

Name: _____

Address: _____

RECEIVED
FEB 14 2025
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Signature: _____

Name: _____

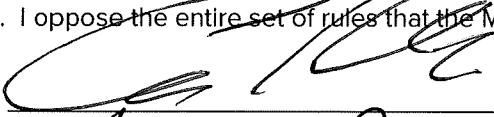
Address: _____

Jim Kurowski
Jim Kurowski
17485 Co Rd. 6
Strathcona MN 56759
218 689 3663

RECEIVED
FEB 14 2025
Office of Administrative Hearings

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature:



Name:

Andrew Palk

Address:

11827 220th Ave

Strathcona MN

56259

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature: Joel Schreurs

Name: Joel Schreurs RECEIVED

Address: 2157 City Hwy 8 FEB 14 2025

Tyler Mn. 56178
Office of Administrative Hearings

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Signature: Mike Skang RECEIVED

Name: Mike Skang FEB 14 2025

Address: 21498 420th St. SW
Office of Administrative Hearings


Beltrami Mn
56517

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature: _____

Name: _____

Address: _____


Ryan Mackenthun
11564 Nickel Ave
Brownton, MN 55312

RECEIVED
FEB 14 2025
Office of Administrative Hearings

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Signature: _____

Name: _____

Address: _____

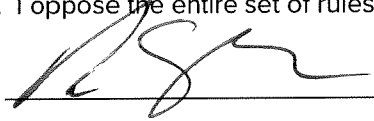
Darin Johnson
14412 550th Ave
Wells, MN 56097

Office of Administrative Hearings

RECEIVED
FEB 14 2025

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Signature:



Name:

Tom Slonecka

Address:

29240 General Trail
Madison Lake MN

Office of Administrative Hearings

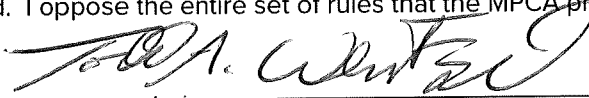
FEB 14 2025

RECEIVED

6

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Signature:



Name:

Todd A. Wentzel

Address:

1150 30th St SE

Murdock, MN 562

Office of Administrative Hearings

FEB 14 2025

REC

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature: _____

Name: _____

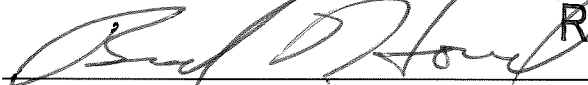
Address: _____

Justin Remus

26240 205th Ave
New Ulm, MN 56073

RECEIVED
FEB 14 2025
Office of Administrative Hearings

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature:  RECEIVED

Name: Brad Hovel FEB 14 2025

Address: 34440 Co 25th Office of Administrative Hearings
Cannon Falls, MN 55809

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature:

Robert Worth

Name:

Robert Worth

Address:

408 So Fremont St

Lake Benton mn 56149

Office of Administrative Hearings

FEB 14 2025

RECEIVED

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Signature: _____

Name: _____

Address: _____

Joseph Smerka

105 Eginton Rd

Mankato MN

56001

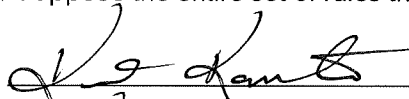
RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature:



Name:

Kent Rander

Address:

10025 Hwy 40 NW

MilAn MN 56262

RECEIVED

FEB 14 2025

Initiative Hearings

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature: Robert E. Wehse

Name: Robert E. Wehse

Address: 1173 28th Ave

Westbrook Inn 56187

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature: _____

Name: _____

Address: _____

RECEIVED

FEB 14 2025

of Administrative Hearings

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Signature: _____

Name: _____

Address: _____

John Swanson
John Swanson
13818 Elmer Harris Dr
Mentor Mn 56736

RECEIVED
FEB 14 2025
Office of Administrative Hearings

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature:



RECEIVED

Name:

James Johstad

FEB 14 2025

Address:

24529 440th ST SE
Belknap MN 56517

Office of Administrative Hearings

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Signature: Sara Wynn

Name: Sara Wynn

Address: 1850 121st St

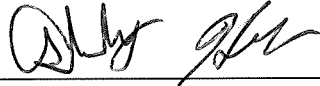
Stacyton, MN 56172

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature: 

Name: Ashley Hahn

Address: 65679 24th St
Litchfield MN 55355

RECEIVED

FEB 14 2025

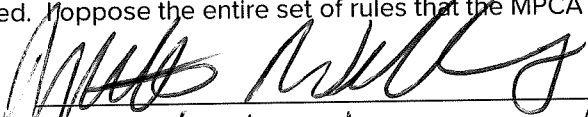
Office of Administrative Hearings

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Signature:

Name:

Address:


Matt Welling
39342 CSAH 25
Paynesville, MN 56362

RECEIVED
FEB 14 2025
Office of Administrative Hearings

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Signature:

Gary Prescher

Name:

Gary Prescher

Address:

56924 108th Street
Wells, MN 56097

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature: Ruby Moe
Name: Rodney Moe
Address: 58292 330 St.
WALTTAM, MN 55982

RECEIVED

FEB 14 2025

Office of Administrative Hearings

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Signature:  RECEIVED

Name: Daniel Gerlach FEB 14 2025

Address: 15241 540th Ave Office of Administrative Hearings

Austin MN 55912

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature: Alan G Adams RECEIVED

Name: Alan G Adams FEB 14 2025

Address: 57772 110 TH ST Office of Administrative Hearings
Cosmos MN 56228

Pursuant to the Dual Notice of Intent to Adopt Rules that the Minnesota Pollution Control Agency published in the *State Register* on December 30, 2024, I request that the MPCA hold a hearing regarding its proposal to adopt rules governing Waste Treated Seed. I oppose the entire set of rules that the MPCA proposes to adopt.

Signature: Douglas Adams

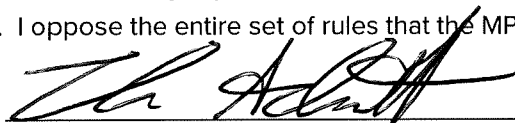
Name: _____

Address: Cosmos

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FEB 14 2025
Office of Administrative Hearings

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Signature:



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Name:

Thomas Schmitt

FEB 14 2025

Address:

37238 MN Hwy 22

Eden Valley, MN 55329

Office of Administrative Hearings

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Signature: 

Name: Kevin Libbesmeier

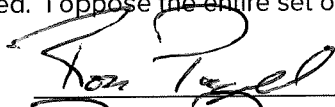
Address: 2567 140TH ST
WATKINS MN 55389

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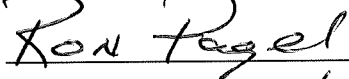
ive Hearings

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Signature:



Name:



Address:



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Signature: Eliot A. Brenick

Name: Eliot A. Brenick

Address: Litchfield, MN

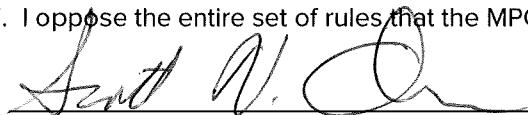
RECEIVED

FEB 14 2025

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Signature:



Name:

Scott V. Olson

Address:

Litchfield, MN

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FEB 14 2025

Office of Administrative Hearings

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By: OAH on 1/29/2025

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Signature: _____



Name: _____

Ross Hamre

Address: _____

24100 430th St SW

Beltrami, MN 56517