



**CLEVELAND-CLIFFS INC.**

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To: Whom it May Concern

Minnesota Pollution Control Agency

Thank you for the opportunity to provide feedback on MPCA's *PFAS in Biosolids Strategy* fact sheet and strategy documents released for public comment. As a land applicator of biosolids produced at WWTFs, Cleveland-Cliffs is interested in the strategy and how the guidance will be implemented. Biosolids application has been beneficial in establishing vegetation on reclamation sites and bare tailings, as well as allowing us to produce hay which has been used in fugitive dust mitigation for some of our sites.

Please consider the following comments when finalizing the Biosolids PFAS Strategy for land application of biosolids.

1. To reduce overlap between state and federal regulatory programs, please ensure that the Minnesota PFAS Strategy requirements sunset when EPA announces limits for PFAS in biosolids applied to land, as noted in MPCA's 'PFAS in biosolids strategy fact sheet'.
2. After a municipal wastewater treatment facility (WWTF) conducts PFAS testing, the results of such testing should be communicated to landowners and farmers that receive biosolids for land application if different than the WWTF, regardless of the PFOA or PFOS concentration tier.
3. Upon request by landowners and farmers that have or will potentially receive biosolids for land application, WWTFs must provide a summary of all historical PFOA or PFOA analysis conducted on biosolids at the WWTF.
4. To continue encouraging the beneficial reuse of biosolids in a manner that protects human health and the environment, the State of Minnesota and MPCA should consider developing legislation that protects landowners and farmers from future potential liability if PFAS contamination is discovered at land application sites that have historically complied with and followed MPCA's biosolids land application program and permitting requirements.

Sincerely,

*Brooke Lund*

Brooke Lund, Program Manager – Environmental Permitting & Regulatory