



CLEVELAND-CLIFFS INC.

Cliffs Mining Company

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To: Whom it May Concern

Minnesota Pollution Control Agency

Thank you for the opportunity to provide feedback on MPCA's *Industrial Stormwater General Permit* fact sheet and draft permit documents released for public comment. As a current permit host of an Industrial Stormwater General Permit, Cleveland-Cliffs is interested in the strategy and how the guidance will be implemented.

Please consider the following comments when finalizing the Industrial Stormwater General Permit.

1. Will the new EPA PFAS limits and rules be considered, as noted in MPCA's NPDES/SDS Permit Program fact sheet? EPA 833-B-96-003
2. In reference to section 18.4 of the Draft Permit; mobilization through 'subsurface solids' does not seem to be within scope of a stormwater permit. Definition of 'subsurface solids' needed.
3. In reference to section 36.2 B of the Draft Permit; the added 30 day requirement for SWPPP modification is problematic. Prior expectations were that the list be checked annually.
4. In reference to section 49.4; as this is a new requirement of the draft permit, how was *four times or greater* selected? Existing language was sufficient, new requirement seems unfounded.

Sincerely,

Brooke Lund, Program Manager – Environmental Permitting & Regulatory