

Multiple Senders

Email comments received 9/5/25.

From: [Montgomery, Brandon \(MPCA\)](#)
To: [Handeland, Stephanie \(MPCA\)](#)
Subject: FW: Webform submission from: Ask MPCA online form
Date: Friday, September 5, 2025 1:01:37 PM

Steph,

Here is a comment for you.

Brandon Montgomery | Water Quality Permits Unit Supervisor

Pronouns | he/him/his

Minnesota Pollution Control Agency (MPCA)

Industrial Division

520 Lafayette Road | St. Paul, MN | 55155

651-757-2230

Brandon.Montgomery@State.MN.US | www.pca.state.mn.us



Our mission is to protect and improve the environment and human health.

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From: MN_MPCA_General-Info <Info.PCA@state.mn.us>

Sent: Friday, September 5, 2025 9:19 AM

To: Monson, Phil (MPCA) <phil.monson@state.mn.us>; Montgomery, Brandon (MPCA) <brandon.montgomery@state.mn.us>

Subject: FW: Webform submission from: Ask MPCA online form

Hello there,

For your review...

Please let me know if there are other staff that should also be sent this feedback.

Thank you!

Katie Coyne

Customer Service Specialist Int.

Facilities Support

Minnesota Pollution Control Agency (MPCA)

Operations Division – Facilities Management Section

520 Lafayette Road North | St Paul, MN | 55155

catherine.coyne@state.mn.us

Ph: (651)757-2902

Ph: (651)296-6300

From: Form submission from: Ask MPCA online form <webadmin.pca@state.mn.us>

Sent: Thursday, September 4, 2025 6:20 AM

To: MN_MPCA_General-Info <Info.PCA@state.mn.us>

Cc: bwtammi@gmail.com

Subject: Webform submission from: Ask MPCA online form

Submitted on Thu, 09/04/2025 - 06:19

Submitted by: Anonymous

Submitted values are:

Name

Brian

Email

bwtammi@gmail.com

Phone

(218) 966-1700

Question for the Minnesota Pollution Control Agency

I am writing to provide comments regarding public notice of draft NPDES permits MN0055948 and MN0031879 for the U. S. Steel Keetac tailings basin and mining area, respectively. I have interest in these draft permits because I, like most Minnesotans, care deeply about protecting the environment.

I am concerned about the Minnesota Pollution Control Agency's (MPCA) sulfate water quality standard of 10 mg/L for wild rice waters and its consequences to the Iron Range and communities across the state. MPCA was directed to review and update the wild rice sulfate standard in 2011 but has not done so to date. The future of Minnesota mines, local governments and other industries are critically affected by the enforcement of this outdated standard.

I strongly urge MPCA to update the wild rice sulfate standard considering current science and site-specific variables. The current 10 mg/L sulfate standard oversimplifies

the environmental needs of wild rice. Many other factors determine wild rice resilience, such as water depth and fluctuation, predation, and competing vegetation. Wild rice has even proven to be successful in waters with sulfate levels up to 1,600 mg/L and beyond – 160 times higher than our current standard. The current 10 mg/L standard is not proven to be effective and compliance with it is unattainable for many businesses and communities. From wastewater facilities and small businesses to mines employing thousands of Minnesotans, the cost of meeting a 10 mg/L sulfate standard puts Minnesota at risk with no guaranteed outcome. Do not waste time, money and energy on a sulfate standard that doesn't make sense. I strongly urge you to refrain from including permit limits for sulfate until the time and resources are invested to develop a sulfate standard that follows modern science, addresses site-specific variables and contains cost as required by the 2011 law.

Beyond environmental science, this issue carries significant economic implications for our region and the State of Minnesota. Mining is a cornerstone of Northeast Minnesota's economy, contributing over \$1.8 billion annually and supporting more than 4,000 family-sustaining jobs. These positions offer wages significantly above the regional average, with mining workers earning approximately \$1,708 per week, nearly \$950 more than the average across all industries. The sector also accounted for over one-third of net new jobs in the region during recent growth periods.

The current Keetac compliance schedule is too short and unattainable. There are currently no commercially proven and economical sulfate treatment strategies in place anywhere in the world. Time is needed to evaluate and develop treatment alternatives that are effective and achievable. Since these are some of the first permits to contain the 10 mg/L sulfate limit, other permittees will use the testing and engineering developed for compliance as a model in the future. Current treatment technologies to reduce sulfate levels result in increased solid waste that will be required to be landfilled, increased electrical usage, increased greenhouse gas emissions, and other negative environmental outcomes. Time and careful consideration are needed to develop feasible sulfate treatment that all Minnesotans can benefit from. The MPCA should allow a longer compliance schedule, or grant the variance, to provide more time to effectively find a feasible solution. The current compliance schedule does not include time for regulatory agency requirements such as environmental review, permitting and other authorizations that may be required.

The two draft permits require wild rice sulfate compliance at each of Keetac's outfalls, yet they all discharge to one water body where the MPCA has said the wild rice standard applies. The compliance point should protect that water body and be representative of

the combined discharges from the Keetac facility. The permittee requested to combine sulfate compliance points to factually represent offsite discharges, however the MPCA denied that request. It is concerning that the MPCA will not consider the request, even though it is more factually accurate than what is contained in the draft permits. MPCA must modify the permits to include a single downstream compliance point as proposed by the permittee.

U. S. Steel has submitted two site-specific standard (SSS) requests for sulfate at Hay Lake near Keetac. The 2014 request was never acted upon by MPCA and the 2022 request was denied. These applications followed MPCA guidance and show that a higher sulfate standard than 10 mg/L is warranted. It is concerning that the MPCA does not take into account modern science and site-specific conditions. I urge the MPCA to reconsider the SSS applications as Keetac has been discharging to Hay Lake for almost 60 years with healthy wild rice in existence.

In summary, I urge the MPCA:

To refrain from including sulfate limits in Keetac's permits. If the permit limits remain as proposed, the MPCA must modify the permits to contain a single sulfate compliance point and allow more time for compliance.

To abide by the 2011 law and update the 10 mg/L sulfate standard that the state of Minnesota has recognized as being incorrect

Thank you.

From: [Larson, Kathryn \(DNR\)](#)
To: [Margaret Watkins](#)
Cc: [Remer, Sarah \(MPCA\)](#); [Engstrom, Jennifer N \(DNR\)](#); [Haugen, Theresa \(MPCA\)](#); [Handeland, Stephanie \(MPCA\)](#); [Beyeler, Jon \(DNR\)](#); [Sauter, Malory \(DNR\)](#); [Bjergo, Kathleen \(DNR\)](#)
Subject: RE: MN0055948 U.S. Steel Corporation, Minnesota Ore Operations - Keetac Tailings Basin Area Public Notice - July 8, 2025 - September 8, 2025
Date: Friday, September 5, 2025 12:00:56 PM
Attachments: [image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

Margaret,

With respect to your questions, we have reviewed the files and discussed the question with the team in LAM on the Water Appropriation as well as Dam Safety.

Here's what we have found:

Stage 2 pond was constructed as part of the Stage 2 basin construction designs (see figure 2, "Location map of permitted facility" from the Draft NPDES and SDS Permit currently on notice by the MPCA). It is not outside of the constructed basin. Initial Stage 2 construction was started in the late 1970's with a starter dam.

To the best of our knowledge, no natural basins or impoundments existed in the vicinity of Reservoirs 2, 6, and 2 North. Our sources of historic aerial photos include:

- Itasca Co Land Explorer air photos: <https://maps-test.co.itasca.mn.us/PublicApp/>
- Minnesota Geospatial Commons: <https://gisdata.mn.gov/>

Please let us know you have additional questions.

Kathryn (Katie) Larson

Reclamation Supervisor | Lands and Minerals

Minnesota Department of Natural Resources

Hibbing Office

1525 3rd Ave East

Hibbing, Minnesota 55746

Phone: 218-231-8457

Email: kathryn.larson@state.mn.us
mndnr.gov



From: Larson, Kathryn (DNR)
Sent: Monday, August 11, 2025 3:37 PM
To: Margaret Watkins <mwatkins@grandportage.com>
Cc: Remer, Sarah (MPCA) <Sarah.Remer@state.mn.us>; Engstrom, Jennifer N (DNR) <jennifer.engstrom@state.mn.us>; Haugen, Theresa (MPCA) <theresa.haugen@state.mn.us>; Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Beyeler, Jon (DNR) <Jon.Beyeler@state.mn.us>; Sauter, Malory (DNR) <Malory.Sauter@state.mn.us>; Bjergo, Kathleen (DNR) <Kathleen.Bjergo@state.mn.us>
Subject: RE: MN0055948 U.S. Steel Corporation, Minnesota Ore Operations - Keetac Tailings Basin Area Public Notice - July 8, 2025 - September 8, 2025

Theresa and Margaret,

Thanks for forwarding on this question. We are working on a response and working to coordinate with the LAM waters group and Dam Safety. Do you have a timeline on when you need the information?

Kathryn (Katie) Larson

Reclamation Supervisor | Lands and Minerals

Minnesota Department of Natural Resources

Hibbing Office

1525 3rd Ave East

Hibbing, Minnesota 55746

Phone: 218-231-8457

Email: kathryn.larson@state.mn.us
mndnr.gov



From: Haugen, Theresa (MPCA) <theresa.haugen@state.mn.us>
Sent: Thursday, August 7, 2025 4:18 PM
To: Margaret Watkins <mwatkins@grandportage.com>; Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; cholm <cholm@boisforte-nsn.gov>; Frank Villebrun JR <fvillebrun@boisforte-nsn.gov>; nancyschuldt <nancyschuldt@fdlrez.com>; Grace M Leppink-Walz <GraceLeppink-Walz@FDLBand.org>; Joshua T Schrope <joshuaschrope@fdlband.org>; Elise McKeever <EliseMcKeever@FDLBand.org>; nicolewalker@fdlrez.com; kelsyfederico@fdlrez.com; Deschampe, Robert <robertdeschampe@grandportage.com>; agatha armstrong <agathaa@grandportage.com>; AprilM@grandportage.com; Marie Spry

<mariespry@grandportage.com>; Toby Stephens <tobys@grandportage.com>; Brandy Toft <brandy.toft@llojibwe.net>; Craig Tangren <craig.tangren@llojibwe.net>; Jakob Sorenson <jakob.sorensen@llojibwe.net>; Eric Krumm <eric.krumm@llojibwe.net>; charlie.lippert <Charlie.Lippert@millelacsband.com>; perry.bunting <perry.bunting@millelacsband.com>; chad.weiss@millelacsband.com; J Leblanc <jleblanc@redlakenation.org>; Shane Bowe <SBowe@redlakenation.org>; Kayla Bowe <Kayla.Bowe@redlakenation.org>; Joshua Jones <joshua.jones@redlakenation.org>; Zoe Keezer <zoe.keezer@whiteearth-nsn.gov>; Darren Vogt <dvogt@1854treatyauthority.org>; John Coleman <jcoleman@glifwc.org>; Esteban Chiriboga <esteban@glifwc.org>; Shania Nordby <shania.nordby@redcliff-nsn.gov>; Noah Saperstein <noah.saperstein@redcliff-nsn.gov>

Cc: Kesner, Shannon (MPCA) <shannon.kesner@state.mn.us>; Wold, Amanda (She/Her/Hers) (MPCA) <amanda.wold@state.mn.us>; Vanderbosch, Dana (MPCA) <dana.vanderbosch@state.mn.us>; Ahlers, Courtney (She/Her/Hers) (MPCA) <courtney.ahlers@state.mn.us>; Remer, Sarah (MPCA) <Sarah.Remer@state.mn.us>; Pestano, Paul (MPCA) <paul.pestano@state.mn.us>; Larson, Kathryn (DNR) <Kathryn.Larson@state.mn.us>

Subject: RE: MN0055948 U.S. Steel Corporation, Minnesota Ore Operations - Keetac Tailings Basin Area Public Notice - July 8, 2025 - September 8, 2025

Hi Margaret,

Thank you for the email. Your questions below in regards to the Stage 2 pond and Reservoirs 2, 6, and 2 North can be directed to MDNR, Kathryn Larson, Mineland Reclamation Supervisor, at kathryn.larson@state.mn.us (also cc'd on this email).

If you have other comments or questions on either of the two Keetac permits currently on public notice, or the variance preliminary determination, please submit them to the public comment portal which can be found here:

- Mine permit and variance preliminary determination documents:
<https://mpca.commentinput.com/?id=BsGkbZQAt>
- Tailings permit and variance preliminary determination documents:
<https://mpca.commentinput.com/?id=UbmfvhJ6D>

Other information in relation to the USS Keetac permits, including the upcoming Sept. 3 public meeting, is also available on our webpage here: <https://www.pca.state.mn.us/news-and-stories/mpca-includes-greater-protection-for-wild-rice-waters-in-keetac-mining-water-permits>

Thanks again,
Theresa

Theresa Haugen, Manager
Water and Mining Section
Industrial Division
218-316-3920

From: Margaret Watkins <mwatkins@grandportage.com>
Sent: Wednesday, July 30, 2025 11:03 AM
To: Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; cholm <cholm@boisforte-nsn.gov>; Frank Villebrun JR <fvillebrun@boisforte-nsn.gov>; nancyschuldt <nancyschuldt@fdlrez.com>; Grace M Leppink-Walz <GraceLeppink-Walz@FDLBand.org>; Joshua T Schrope <joshuaschrope@fdlband.org>; Elise McKeever <EliseMcKeever@FDLBand.org>; nicolewalker@fdlrez.com; kelsyfederico@fdlrez.com; Deschampe, Robert <robertdeschampe@grandportage.com>; agathaa <agathaa@grandportage.com>; Aprilm@grandportage.com; Marie Spry <mariespry@grandportage.com>; Toby Stephens <tobys@grandportage.com>; Brandy Toft <brandy.toft@llojibwe.net>; Craig Tangren <craig.tangren@llojibwe.net>; Jakob Sorenson <jakob.sorensen@llojibwe.net>; Eric Krumm <eric.krumm@llojibwe.net>; charlie.lippert <Charlie.Lippert@millelacsband.com>; perry.bunting <perry.bunting@millelacsband.com>; chad.weiss@millelacsband.com; J Leblanc <jleblanc@redlakenation.org>; Shane Bowe <SBowe@redlakenation.org>; Kayla Bowe <Kayla.Bowe@redlakenation.org>; Joshua Jones <joshua.jones@redlakenation.org>; Zoe Keezer <zoe.keezer@whiteearth-nsn.gov>; Darren Vogt <dvogt@1854treatyauthority.org>; John Coleman <jcoleman@glifwc.org>; Esteban Chiriboga <esteban@glifwc.org>; Shania Nordby <shania.nordby@redcliff-nsn.gov>; Noah Saperstein <noah.saperstein@redcliff-nsn.gov>
Cc: Kesner, Shannon (MPCA) <shannon.kesner@state.mn.us>; Wold, Amanda (She/Her/Hers) (MPCA) <amanda.wold@state.mn.us>; Vanderbosch, Dana (MPCA) <dana.vanderbosch@state.mn.us>; Ahlers, Courtney (She/Her/Hers) (MPCA) <courtney.ahlers@state.mn.us>; Haugen, Theresa (MPCA) <theresa.haugen@state.mn.us>; Remer, Sarah (MPCA) <Sarah.Remer@state.mn.us>; Pestano, Paul (MPCA) <paul.pestano@state.mn.us>
Subject: Re: MN0055948 U.S. Steel Corporation, Minnesota Ore Operations - Keetac Tailings Basin Area Public Notice - July 8, 2025 - September 8, 2025

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Good morning, Stephanie:

I realized looking at the maps and figures for Keetac that the Stage 2 pond is outside the tailings basin. Can you tell me how that pond was constructed, when, and why it is outside the constructed basin? Also, I was wondering if the Reservoirs 2, 6, and 2 North were constructed, or if they were at one time natural waters that had water control structures installed?

Any clarifications would be greatly appreciated.

Sincerely,

Margaret Watkins

From: Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>

Sent: Tuesday, July 8, 2025 3:10 PM

To: holm@boisforte-nsn.gov <holm@boisforte-nsn.gov>; fvillebrun@boisforte-nsn.gov <fvillebrun@boisforte-nsn.gov>; Nancy Schuldt <nancyschuldt@fdlrez.com>; graceleppink-walz@fdlband.org <graceleppink-walz@fdlband.org>; Joshua T Schrope <joshuaschrope@fdlband.org>; Elise McKeever <elisemckeever@fdlband.org>; nicolewalker@fdlrez.com <nicolewalker@fdlrez.com>; kelsyfederico@fdlrez.com <kelsyfederico@fdlrez.com>; Bobby Deschampe <robertdeschampe@grandportage.com>; agatha armstrong <agathaa@grandportage.com>; April McCormick <aprilmc@grandportage.com>; Marie Spry <mariespry@grandportage.com>; Toby Stephens <tobys@grandportage.com>; Margaret Watkins <mwatkins@grandportage.com>; brandy.toft@llojibwe.net <brandy.toft@llojibwe.net>; craig.tangren@llojibwe.net <craig.tangren@llojibwe.net>; jakob.sorensen@llojibwe.net <jakob.sorensen@llojibwe.net>; eric.krumm@llojibwe.net <eric.krumm@llojibwe.net>; charlie.lippert@millelacsband.com <charlie.lippert@millelacsband.com>; perry.bunting@millelacsband.com <perry.bunting@millelacsband.com>; chad.weiss@millelacsband.com <chad.weiss@millelacsband.com>; jleblanc@redlakenation.org <jleblanc@redlakenation.org>; sbowe@redlakenation.org <sbowe@redlakenation.org>; kayla.bowe@redlakenation.org <kayla.bowe@redlakenation.org>; Joshua Jones <joshua.jones@redlakenation.org>; Zoe Keezer <zoe.keezer@whiteearth-nsn.gov>; dvogt@1854treatyauthority.org <dvogt@1854treatyauthority.org>; John Coleman <jcoleman@glifwc.org>; Esteban Chiriboga <esteban@glifwc.org>; Shania Nordby <shania.nordby@redcliff-nsn.gov>; Noah Saperstein <noah.saperstein@redcliff-nsn.gov>
Cc: shannon.kesner@state.mn.us <shannon.kesner@state.mn.us>; amanda.wold@state.mn.us <amanda.wold@state.mn.us>; Vanderbosch, Dana (MPCA) <dana.vanderbosch@state.mn.us>; Ahlers, Courtney (She/Her/Hers) (MPCA) <courtney.ahlers@state.mn.us>; Haugen, Theresa (MPCA) <theresa.haugen@state.mn.us>; Remer, Sarah (MPCA) <Sarah.Remer@state.mn.us>; Pestano, Paul (MPCA) <paul.pestano@state.mn.us>

Subject: MN0055948 U.S. Steel Corporation, Minnesota Ore Operations - Keetac Tailings Basin Area Public Notice - July 8, 2025 - September 8, 2025

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The Minnesota Pollution Control Agency is requesting a public notice review for the U.S. Steel Corporation – Keetac Tailings Basin Area NPDES/SDS permit (MN0055948). The draft permit and fact sheet which were sent out for pre-public notice review in July 2024 and January 2025 have been revised.

The revised draft permit, fact sheet and other supporting documentation can be found in the ShareBase Link: <https://app.sharebase.com/#/folder/160953/share/185-XUROI4pZLsZpNbHxpF-7ajeJV8>

Minor changes were made to the draft permit based on comments received during the pre-public notice period which ended on February 28, 2025. Changes were made to the compliance schedule in the draft permit. These changes can be found in the “Compliance Schedule” section on Pages 21-23 of the draft permit.

The Permittee submitted a variance request from Minnesota Rules Ch. 7050.0224 Subp. 2 for effluent limits based on the Class 4A sulfate water quality standard for waters used for the production of wild rice on May 30, 2025. Upon review of the documents, the MPCA has made a draft preliminary decision on the variance request. Documentation regarding the variance can be found attached to the Fact Sheet.

This message provides notification of the public notice period for the US Steel – Keetac Tailngs Basin Area draft permit and variance. The public notice period is open from July 8, 2025 – September 8, 2025 with a public meeting slated for the last week in August or first week in September in Virginia, MN (more details on date and time will be shared on our website soon here: <https://www.pca.state.mn.us/local-sites-and-projects/keewatin-us-steel-keetac>).

If you have any questions regarding the draft permit, please contact me at stephanie.handeland@state.mn.us or at (651) 757-2405 prior to **September 8, 2025**.

Thank you,

Stephanie Handeland

Minnesota Pollution Control Agency

Industrial Division

520 Lafayette Road North | St. Paul, MN | 55155

Phone | (651) 757-2405

E-mail | stephanie.handeland@state.mn.us



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