Multiple Senders

Email comments submitted by multiple senders on 8-21-25

From: Bridget Marsh
To: Handeland, Stephanie (MPCA)
Subject: Comment on NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Thursday, August 21, 2025 11:27:59 AM

Hello,

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.

My biggest question is what was the 10 milligrams per liter standard of sulfate based on for wild rice, when wild rice has been successful in waters with sulfate levels of 1,600 milligrams per liter?

According to MNDNR, wild rice has been historically documented in 45 of Minnesota's 87 counties. How does the sulfate level vary from lakes in these counties?
The federal sulfate level in drinking water is set at 250 milligrams per liter, based on taste and odor.

There are nearly one thousand facilities statewide with high sulfate levels in their wastewater treatment, yet the MPCA is going after taconite plants that provide jobs for our communities. Taconite plants and municipalities would have to invest millions of dollars to meet the 10 milligrams per liter standard of sulfate in wastewater. **This would greatly impact property taxes and our economy.**

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future of Minnesota mines, local governments and other industries are critically affected by the enforcement of this outdated standard.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.

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,

BRIDGET MARSH
Field Service Dispatch Supervisor - Mining

10081 East Highway 169, Buhl, MN 55713
Office 218-258-2998
Mobile 218-343-3535

FACEBOOK INSTAGRAM YOUTUBE LINKEDIN

From: Blaine Rinell
To: Handeland, Stephanie (MPCA)
Subject: Comment on NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Thursday, August 21, 2025 10:02:55 PM

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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.

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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.

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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.

Blaine Rinell
4387 Golf Course Road
Eveleth, MN 55734
bmrinell@mediacombb.net

From: Craig Whitman
To: Handeland, Stephanie (MPCA)
Subject: sulfate
Date: Thursday, August 21, 2025 12:24:16 PM

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.

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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.

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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.

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In summary, I urge the MPCA:

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- *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: Christian J. Witzel
To: Handeland, Stephanie (MPCA)
Subject: Comment on NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Thursday, August 21, 2025 10:11:59 AM

Greetings,

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Thank you.

CHRIS WITZEL
Mining Sales Manager

10081 East Highway 169, Buhl, MN 55713
Office 218-258-2955
Mobile 507-227-8864

FACEBOOK INSTAGRAM YOUTUBE LINKEDIN

ZIEGLER CAT

From: Dan Ostrander
To: Handeland, Stephanie (MPCA)
Subject: Comment on NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Thursday, August 21, 2025 9:35:21 AM

Stephanie,

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- *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.

Dan Ostrander

420 E Hawkins Ave

Nashwauk MN 55769

(218l 969 9904

August 21, 2025

Dear Reader,

My name is Frank Pezzutto and I am writing to express my concerns regarding the controversial wild-rice/sulfate standard issue. As a local resident, I enjoy many outdoor activities here on the Iron Range and wild rice harvesting is especially important to me.

I spent 30 years at US Steel as their geologist (Minntac) and I closed out my career at the Keetac facility. I am proud to say that I was employed by such a fine and iconic company. My oldest son (a fourth-generation steelworker) is employed by US Steel at their Keetac facility. My youngest son works with me at Northeast Technical Services (NTS) where we continue to interact with local mines regarding environmental issues. I am on a part-time basis at NTS (as I am winding down my career), but nevertheless, our livelihoods and many of our friends and neighbors are intertwined with the mines or in mining related activities.

I am a wild-rice harvester and have been for decades. I was introduced to this wonderful adventure by an Anishinaabe elder long ago and I, in turn, have introduced well over 20 people to the traditional manoomin harvest. I am cognizant of the cultural and spiritual importance of wild rice to our indigenous people and recognize that it is important to protect this sacred resource. When you spend as much time as I have in a wild-rice paddy, you learn a lot from observing the interplay of nature. You'll see that wild rice is cyclical and is greatly influenced by wind storms, water levels (think June 2024 flood) and by predation. Trumpeter Swans, although beautiful, are now plentiful to the area and can wipe out a wild rice stand in several days.

When you're pushing or paddling your canoe through an especially thick wild rice stand, you're disturbing the mucky substrate that anchors the wild rice plants and you'll notice a very distinct odor of sulfur emanating from the water. A rational thinking earth scientist such as myself can easily compute that wild rice can and does thrive in water that has far more than 10 mg/L sulfates. Sulfur is important in many natural processes. Sulfur is a vital element in amino acids, proteins and enzymes in all plants. Without sulfur, plants cannot produce chlorophyll and die. Humans need sulfur as well!

A wild-rice stand is a very dynamic and integrated biotic realm. To accept that this dynamic can be replicated in a sterile test-tube and to dictate at what level sulfate damages living plants is not sound science. As a geologist, my peers in earth-related sciences would agree that applying a broad and subjective decision is unfounded and not credible. The sulfate standard in Minnesota is based on flawed research and should be eliminated. Thank you for taking the time to read my thoughts.

Respectfully submitted,

Frank Pezzutto, M.Sc. Geology, M.S. Management

From: Jason E. Strahan
To: Handeland, Stephanie (MPCA)
Subject: NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Thursday, August 21, 2025 10:58:39 AM

I am writing to you not just as a Minnesota resident, but as a husband, father, and community member who is deeply worried about the impact of our state's outdated sulfate standard on families like mine.

I work at Ziegler CAT, and my wife is a teacher at Mountain Iron. Our family depends on the stability of the mining industry and the schools that are funded by the strength of our local economy. The 10 mg/L sulfate standard, which is based on science from the 1940s and no longer reflects current research, threatens all of that.

This "one-size-fits-all" rule is putting real people in danger of losing their livelihoods. If mines and other industries can't operate under a fair and realistic standard, the ripple effects will devastate our towns—lost jobs, struggling schools, shrinking communities, and families forced to move away. For my wife and her students, it means fewer resources in the classroom. For me and my coworkers, it means uncertainty about whether we can provide for our families.

We all want to protect Minnesota's natural resources, including wild rice. But we can do that while also protecting the people who live and work here. A modern sulfate standard should be based on today's science, account for site-specific conditions, and be realistic enough to keep good jobs in Minnesota.

Please don't let an outdated rule cost our children their schools, our families their futures, and our communities their stability. We need a balanced solution that protects both the environment and the people who

call Minnesota home.

Thank you for listening to the voices of families like mine.

Jason strahan.

From: Sumner, Kevin J
To: Handeland, Stephanie (MPCA)
Subject: Sulfate Standard
Date: Thursday, August 21, 2025 9:28:33 AM

Stephanie,

I believe the sulfate standard as it applies to mining in Northern Minnesota is outdated. We should follow the science!! But the science needs to be accurate and current. There is obviously not a consensus in the scientific community with respect to this standard and therefore should not be enforced until the issue is resolved satisfactorily by all involved.

Thank You,

Kevin Sumner