

Barb Kalmi

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. I have interest in these draft permits because I, like most Minnesotans, care deeply about protecting our environment, and because I serve both as a community member from Keewatin and as the vice chair of our local school district. In these roles, I see firsthand how decisions surrounding industry and environmental regulation directly impact families, students, and the future of our region.

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of Minnesota mines, local governments, schools, and industries are critically affected by the enforcement of this outdated standard. As a school district leader, I know how much our communities depend on stable employment and tax revenue from the mining industry to fund classrooms, extracurricular activities, and essential services for our children. Without mining, the ripple effect on schools, families, and community well-being would be devastating.

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 proven to thrive in waters with sulfate levels far beyond 10 mg/L, and yet our state continues to hold communities and industries to an unattainable and unproven threshold. This misplaced requirement threatens not only businesses and municipalities but also the livelihood of working families and the sustainability of our schools.

The current Keetac compliance schedule is also 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. As a community member, I worry about rushing into costly, ineffective technologies that bring new environmental harms while draining the financial resources of companies that employ our neighbors. As a school district leader, I worry about the long-term consequences this has on our local economy, the tax base, and ultimately the opportunities we are able to provide our students.

Additionally, the two draft permits require wild rice sulfate compliance at each of Keetac's outfalls, even though they all discharge into a single water body where the wild rice standard applies. The compliance point should protect that water body and be representative of the combined discharges. MPCA must modify the permits to include a single downstream compliance point as proposed by the permittee, which is both factually accurate and more reasonable.

U.S. Steel has also submitted two site-specific standard (SSS) requests for sulfate at Hay Lake near Keetac. The 2014 request was never acted upon, and the 2022 request was denied, despite following MPCA guidance and demonstrating that a higher sulfate standard is warranted. It is concerning that the MPCA continues to disregard modern science and site-specific conditions when

the health of our environment, economy, and communities are all at stake.

In summary, I urge the MPCA:

To refrain from including sulfate limits in Keetac's permits.

If limits remain, to modify the permits to include a single sulfate compliance point and allow a longer compliance schedule.

To abide by the 2011 law and update the 10 mg/L sulfate standard, which the state itself has recognized as outdated and incorrect.

As both a community member from Keewatin and a school district vice chair, I cannot stress enough that these decisions do not occur in isolation. They affect families, children, and the sustainability of the Iron Range. Our environment and economy must be balanced through science-based, site-specific standards that protect wild rice while also ensuring the long-term viability of our communities and schools.

Barb Kalmi
RAMS President and ISD 319 Vice Chair