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The draft Keetac wastewater permit is a good start to finally bring U.S. Steel into compliance with the 10 mg/L sulfate standard, but after 15 years of delay since the water treatment study, it needs to be implemented now, not after another unnecessary 5 year delay.

From 2011 through 2016 MPCA already went through a planning, study, and testing process for Keetac sulfate reduction water quality treatment. There is no need to start over. The new owner of U.S. Steel, Nippon Steel, has promised \$11 billion in capital upgrades in order to increase U.S. Steel profits to \$1.7 billion per year. Keetac sulfate treatment should be included in those upgrades.

The draft permit also does not include protection of groundwater which is required under state law. The permits have no groundwater monitoring locations and don't disclose how much polluted wastewater is seeping into groundwater, particularly from the tailings basin.

While I appreciate the steps MPCA is taking to enforce the state sulfate pollution limit for the U.S. Steel Keetac Mine and Tailings Basin, the agency must also revise the wastewater permit to avoid delay and to better protect groundwater, aquatic ecosystems, and manoomin.