

Union Worker Cory Willeck (Cory Willeck)

Hello,

I am submitting comments on the draft NPDES permits MN0055948 and MN0031879 for U.S. Steel Keetac. I work in the mining industry, and like many of my union brothers and sisters, I care about protecting both the environment and the good-paying jobs that support families on the Iron Range.

I'm concerned with the MPCA's wild rice sulfate standard of 10 mg/L. This number is outdated, doesn't reflect current science, and puts thousands of Minnesota jobs at risk. The law required MPCA to update this standard back in 2011, and that still hasn't been done. Enforcing a rule that everyone knows is broken threatens our mines, local governments, small businesses, and the communities we live in.

The 10 mg/L limit is not realistic. Wild rice survival depends on many things—water depth, predators, competing plants—not just sulfate. In fact, wild rice has been shown to grow in waters with sulfate levels much higher than the current standard. Holding mines and wastewater facilities to an unattainable limit wastes time and money, hurts Minnesota workers, and doesn't guarantee better results for wild rice. Until the standard is updated using modern science and site-specific data, sulfate limits should not be included in these permits.

The current Keetac compliance schedule is also unworkable. There is no proven or cost-effective treatment for sulfate anywhere in the world right now. Forcing mines to meet this standard on a short timeline risks lost jobs and higher costs, with no clear environmental benefit. Longer schedules or variances are needed so that real, effective solutions can be developed. Rushing this process will only drive up electricity use, create more waste, and cause other negative environmental impacts.

Another issue is the compliance point. Keetac's discharges all go to the same water body, but the draft permit requires compliance at every outfall. That doesn't make sense. The company asked MPCA to combine compliance points so the measurement actually reflects what's going into the water. That's a reasonable request and should be included in the permit.

Finally, U.S. Steel has submitted site-specific standard requests for Hay Lake, where wild rice has grown for decades despite sulfate levels above 10 mg/L. The science and history clearly show a higher standard is justified, but MPCA hasn't acted on these requests. That needs to change.

In summary, I strongly urge MPCA to:

Refrain from including sulfate limits in Keetac's permits until the standard is updated.

If limits remain, modify the permits to use one downstream compliance point and allow more time for compliance.

Follow the 2011 law and finally update the 10 mg/L sulfate standard.

Minnesota can have both mining jobs and environmental protection, but that requires using up-to-date science and fair rules. Working families shouldn't have to pay the price for an outdated standard.

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