Kneemueller, Ashley (MPCA)

From: juenbug29@everyactioncustom.com on behalf of Sheryl Juenemann <juenbug29@everyactioncustom.com>
Sent: Wednesday, September 3, 2025 6:31 AM
To: Kneemueller, Ashley (MPCA)
Subject: RE: U.S. Steel Keetac Mine and Tailings Basin Permits (MN0031879 and MN0055948) and Application for Variance

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Dear Minnesota Pollution Control Agency Staff,

Thank you for the opportunity to comment on the U.S. Steel Keetac Mine and Tailings Basin permits and U.S. Steel's application for a variance. I would like to support the Minnesota Pollution Control Agency (MPCA) and strengthen enforcement of water quality standards that protect Minnesota wild rice, fish, and human health.

I support these MPCA actions related to the U.S. Steel Keetac Mine and Tailings Basin Permits:

1) I agree with MPCA that U.S. Steel permits should require compliance with Minnesota's wild rice sulfate standard of 10 parts per million (mg/L) at both the Keetac Mine and Tailings Basin. I understand that draft permit limits of 14 mg/L monthly average and 24 mg/L daily maximum are based on this standard.

2) I agree with MPCA that U.S. Steel should be denied a variance from compliance with the sulfate standard. A variance is a specific exception to the rules, and U.S. Steel's resistance to the expense of water quality treatment does not provide grounds to avoid the standard.

3) I support MPCA's requirement that U.S. Steel monitor waste streams at both the Keetac Mine and Tailings Basin for sulfate and other pollutants. It seems that this should have been required a long time ago.

However, I'm concerned that the draft permits have some gaps. The permits should be strengthened in the following ways:

1) MPCA should not give U.S. Steel another five years before they actually have to meet Minnesota's wild rice sulfate standard. Sulfate limits were set in Keetac permits in 2011, and studies on treatment were done and approved by MPCA almost a decade ago. MPCA should give U.S. Steel no more than two years to achieve full compliance with wild rice sulfate limits.

2) MPCA should revise the Keetac permits to require groundwater monitoring, especially the groundwater beneath and adjacent to the Tailings Basin. This monitoring is needed to protect groundwater and to help determine if pollutants released through groundwater are causing or adding to violations of surface water standards.

3) MPCA should require U.S. Steel to test wastewater discharge from day one to make sure it is not toxic to aquatic life, rather than waiting for three years before toxicity testing. MPCA should also require new biological assessments the first year of the permit to determine if downstream fish and macroinvertebrates are impaired.

4) In addition to monitoring for sulfate, MPCA should require monitoring for mercury in surface waters and should update testing for mercury in fish tissue downstream of Keetac.

I appreciate the steps MPCA is taking to control sulfate pollution from the U.S. Steel Keetac Mine and Tailings Basin. But I would also ask that MPCA revise the draft permits to avoid delay and to better protect groundwater, wild rice, fish, and the health of people who eat fish that are now contaminated with mercury.

Thank you for considering my comments,

Sincerely,
Sheryl Juenemann
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