

From: Cheryl Zgonc
To: Handeland, Stephanie (MPCA)
Subject: NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Wednesday, August 27, 2025 4:59:13 PM

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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.

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future of Minnesota mines, local governments and other industries are critically affected by the enforcement of this outdated standard.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

Beyond environmental science, this issue carries significant economic implications for our region and the State of Minnesota. Mining is a cornerstone of Northeast Minnesota's economy, contributing over \$1.8 billion annually and supporting more than 4,000 family-sustaining jobs. These positions offer wages significantly above the regional average, with mining workers earning approximately \$1,708 per week, nearly \$950 more than the average across all industries. The sector also accounted for over one-third of net new jobs in the region during recent growth periods.

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.

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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.

Robert T Zgonc

Local 1938 Steel Worker

Sent from my iPhone

From: [Andrew Rasmusson](#)
To: [Handeland, Stephanie \(MPCA\)](#)
Subject: Comment on NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Wednesday, August 27, 2025 10:26:18 AM
Attachments: [image001.png](#)
[image002.png](#)

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Thank you.

Best Regards,



Andrew Rasmusson
Account Manager – US East

www.me-elecmetal.com



arasmusson@meglobal.com

218-269-9539

Grand Rapids, Minnesota

From: [Brett Cahoon](#)
To: [Handeland, Stephanie \(MPCA\)](#)
Subject: Comment on NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Wednesday, August 27, 2025 10:12:53 AM

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Thank you.

Brett Cahoon

From: [Haines, Benjamin L](#)
To: [Handeland, Stephanie \(MPCA\)](#)
Subject: NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Wednesday, August 27, 2025 11:02:30 AM

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Thank you.

Ben Haines
610 Cleveland Street
Eveleth, MN 55734
218-410-0979

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From: [Bethany Jones](#)
To: [Handeland, Stephanie \(MPCA\)](#)
Subject: Comment on NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Wednesday, August 27, 2025 9:56:30 AM

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I vehemently urge the MPCA to update the wild rice sulfate standard. Considering the updates in science, water levels, and greater understanding of how wild rice is cultivated, and repopulates, this science is out of touch, off-base, and would fail any high school science procedure. It is concerning and highly discouraging that the MPCA, which provides guidance on public health and safety, does not take into account modern science practices and site-specific condition, and would rather watch municipalities, counties, companies, and the population suffer under financial strain because the MPCA would rather fast-track an imaginary concern without a solid basis or plan.

I have witnessed more wild rice loss under higher than normal water conditions than I have wild rice grown in water more than 80 mg/L sulfate. I have witnessed more plant loss under higher than normal water conditions than water more than 80 mg/L sulfate. I have witnessed more natural decay under higher than normal water conditions than water more than 80 mg/L sulfate. However, the MPCA does not take the time to consider these factors and instead would rather put everything on the line. This shows me that the goal of the MPCA is not to public health or control pollution, but would rather obey old practices.

In summary, I urge the MPCA to take the loss, take a step back, and take some time and careful consideration to develop a more feasible sulfate treatment from which ALL Minnesotans can benefit. Refrain from including sulfate limits in Keetac's permits. Abide by the 2011 law and update the 10 mg/L sulfate standard that the state of Minnesota has recognized as being incorrect.

Sincerely,

Bethany Jones

3873 Berg Rd

Hibbing, MN 55746

218-403-0656

From: [Jeff Pederson](#)
To: [Handeland, Stephanie \(MPCA\)](#)
Subject: Comment on NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Wednesday, August 27, 2025 10:19:28 AM
Attachments: [image001.png](#)
[image002.png](#)

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company operates a foundry in Duluth MN that will also be directly affected if this outdated law is implemented. Not only does this affect the Iron Range it will also impact the 120 positions at our Duluth facility. We have highly trained Union employees that rely directly on Minnesota Mining.

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Best Regards,



Jeff Pederson

Director of Sales- US Iron Range

jpедerson@meglobal.com

218-830-0054

Hibbing, Minnesota

From: [Voelz, Kevin M](#)
To: [Handeland, Stephanie \(MPCA\)](#)
Subject: Comment on NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Wednesday, August 27, 2025 10:49:22 AM
Attachments: [image.png](#)

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Engineer II - Resource Geologist

518 North 17th Ave East Duluth MN, 55812

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From: [Steve Wirtz](#)
To: [Handeland, Stephanie \(MPCA\)](#)
Subject: Comment on NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Wednesday, August 27, 2025 10:28:20 AM

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*Hello – First off, I am a former Environmental Engineer at the Keetac facility. I know first-hand how difficult that job is – keeping a ~60-year-old facility up to modern environmental standards. Although challenging, it's also rewarding to see the positive effects. Unfortunately, meeting the 10mg/l sulfate standard would be challenging, **but not at all rewarding**. It would be an immense expenditure of time and resources for **no benefit to wild rice**. In fact, the effects of achieving would only be negative – negative to the people and community, and negative to the environment for how many resources would be consumed to hit the arbitrary target. **Please be wise for the people and environment you serve.***

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.

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.

Beyond environmental science, this issue carries significant economic implications for our region and the State of Minnesota. Mining is a cornerstone of Northeast Minnesota's economy, contributing over \$1.8 billion annually and supporting more than 4,000 family-sustaining jobs. These positions offer wages significantly above the regional average, with mining workers earning approximately \$1,708 per week, nearly \$950 more than the average across all industries. The sector also accounted for over one-third of net new jobs in the region during recent growth periods.

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.

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