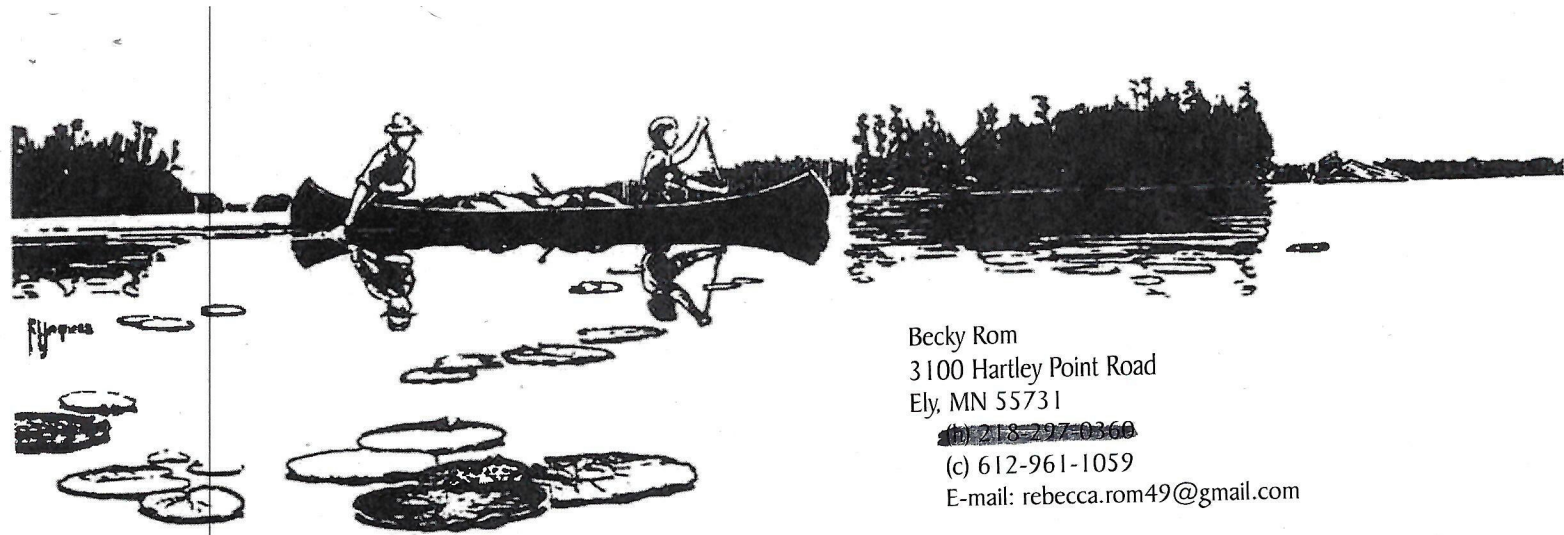




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September 3, 2025

Minnesota Pollution Control Agency (MPCA)

Re: Reissuance of Wastewater (NPDES/SDS) permits for the Keetac Mine Area (MN0331879) and Tailings Basin Area (MN0055948) (Keetac Permits)

Dear MPCA:

I support the Keetac Permits to the extent that they require compliance with Minnesota's wild rice sulfate standard and I support the decision by the MPCA to deny U.S. Steel's variance request from the wild rice sulfate standard on the basis of cost.

1. The wild rice standard of 10 parts per million (mg/L) is based on sound science. The standard is based on the long-standing empirical observation that wild rice is largely restricted in Minnesota to surface waters of less than 10 mg/L (Moyle 1944, 1945, DNR 2008). In 2017, the State of Minnesota completed a six-year scientific investigation using a combination of experimental and empirical approaches to better understand the mechanisms by which sulfate might affect the growth and survival of wild rice. These studies demonstrated clearly the toxic nature of sediment sulfide to rooted aquatic plants like wild rice. (Both sulfate and organic matter stimulate microbial reduction of sulfate to sulfide.) See, *Increase in Nutrients, Mercury, and Methylmercury as a Consequence of Elevated Sulfate Reduction to Sulfide in Experimental Wetland Mesocosms*, Myrbo et al, *Journal of Geophysical Research: Biogeosciences*, 2017; *Sulfide Generated by Sulfate Reduction Is a Primary Controller of the Occurrence of Wild Rice (Zizania palustris) in Shallow Aquatic Ecosystems*, Myrbo et al, *Journal of Geophysical Research: Biogeosciences*, 2017; *Effects of sulfate and sulfide on the life cycle of Zizania palustris in hydroponic and mesocosm experiments*, Pastor et al, *Ecological Applications*, 2017; *The Evolution of Sulfide in Shallow Aquatic Ecosystem Sediments: An Analysis of the Roles of Sulfate, Organic Carbon, and Iron and Feedback Constraints Using Structural Equation Modeling*, Pollman et al, *Journal of Geophysical Research: Biogeosciences*, 2017. The evidence represented in these studies is reflected in the MPCA's assessment that the existing 10 mg/L standard is well justified. See, *MPCA Final Technical Support*

"So I would have no man-made sounds but the simplest - the dip of the paddle, the scrape of a canoe on a sandy beach, the crackle of a campfire." (Florence Page Jaques)

Document : Refinements to Minnesota's Sulfate Water Quality Standard to Protect Wild Rice.

2. Technology for controlling sulfate pollution exists and is in use today in mines in the United States. Reverse Osmosis is technology appropriate for sulfate removal. The Eagle Mine in Michigan deploys reverse osmosis. See, Eagle Mine Groundwater Discharge Permit issued by the Michigan Department of Environmental Quality.
3. U.S. Steel has known since 2011 that it must comply with the wild rice standard; the proposed Keetac Permits do not require compliance until 2030, 19 years after U.S. Steel was first informed of the requirement. Clearly, U.S. Steel has had sufficient time to plan for compliance.
4. Nippon has acquired U.S. Steel and committed to invest \$11 billion in U.S. Steel facilities and operations by 2028. *Nippon Steel Completes Its Acquisition of U.S. Steel, New York Times*, June 18, 2025. Keetac Mine is a critically important taconite mine in the U.S. Steel portfolio and produces desirable DRI pellets as a result of U.S. Steel investment in this technology. Adding pollution control technology would accomplish two objectives. One, it would create jobs in Minnesota, both in installation and in operation. Two, it would fulfill the commitment by U.S. Steel to comply with Minnesota's environmental laws. See, *U.S. Steel's 2024 U.S. Security Exchange Commission Form 10-K (Annual Report pursuant to the Securities Exchange Act of 1934 for the fiscal year ending 12/31/2024)*, which includes statements about how the company is a good corporate citizen and regularly spends money to comply with environmental requirements, that it must comply with environmental requirements, and that it earmarks substantial monies to cover compliance costs related to environmental compliance, including Clean Water Act requirements and permit-related requirements.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Becky Rom", with a stylized flourish at the end.

Becky Rom

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