

Multiple Senders

Written comments submitted at 9/3/25 public meeting.

COMMENTS

on the **Keetac** water permits and variance request

My comments relate to: Mine site ☐ Tailings basin ☐ Variance ☒

To receive a response to your
comments, please list your name
and email and/or mailing address:

The MN Pollution Control Agency's mission
is to protect and improve the environment and
human health.

The company has the responsibility to
the community and our water. This
permit gives the company the legal
right to pollute the air and the water.

**3 ways to submit
your comments:**

Hand this card to an
MPCA staff member

Send via mail to:
MPCA

Attn: Stephanie Handeland
520 Lafayette Road North
St. Paul, MN 55155

**Scan the
QR code**
to submit
comments
online



Deadline: Comments must be submitted online
or postmarked by **Sept. 22, 2025 at 11:59pm**

Your mission and our rights
are for clean water and air.

~~Water~~ The company needs to
be responsible for ALL the
costs of polluting my air
and water. Do your job
MPCA - enforce the laws!

Use the back if you need more room.

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With chemicals emitted
How will it effect the
workers and those living
nearby.

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Lise Abazs
lise@round-river.com

MN is the right place to mine BECAUSE we
have strong regulations. MPCA should
hold to those regulations. The company
should pay the cost of doing its business,
not the water + ^{wild-}rice + health of the local
community. There was a billboard
on the way into town that says

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"Welcome to MN's Mining
District - Taconite,
Critical Minerals, +
Clean Water." Keep
that sign honest.
Keep our water clean.
Prioritize health,
not profit.
Thank you!

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I'm 71 and have eaten wild rice since
a very young child. Wild rice is considered
medicine in my family based on make up
of rice. Next our water is in trouble.
It is important that we do all we can
for the water. In my family it means to
think of 7 generations. I expect great
great grandchildren in my
life time. We were not
drinking out of plastic
bottles in my mothers
lifetime. She died in
2009.

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Denise Estey Lundquist
enrolled in White Earth removal
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Linnea Swenson Tellekson
70 E. Saint Marie St. #224
Duluth, MN 55803

I support the preliminary decision to deny
the variance request. I support the
sulfate limits and MPCA's enforcement to
protect wild rice. The sulfates in the
wastewater are one factor we can control,
while some we cannot. Keetac (US Steel)
has the financial means to build
water treatment facilities.
This will create jobs and
economic stability to the
community.

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Wild rice is critical
to Anishinaabe and Dakota
economies, culture and
spirituality. We
must honor the treaties.

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The leaking tailing basins
should be cleaned up.
Delay isn't an option.
Good jobs can be created
in cleaning up the problems
& finding cleaner
technologies.

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Continuing to do things
the old industrial way
isn't going to solve
the problems of
providing a good quality
of life for the future.

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I am a Minnesota resident currently
visiting the area for a week with a
group of friends to harvest wild
rice on public waters. Ricing is
an activity that is very important
to us + that we do every year. We
have rented out a full resort of
cabins for a week, some members
have hired local fishing
guide + we have

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later + bought food +
gas in the area. Good
science is important to
me so the standard
needs to be sound + effective
+ enforced. We need to
protect our precious
wild resources - rice +
fish + traditional activities.

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I've been coming to the north country to
harvest wild rice for decades and contribute
to the local economy. I am also an
attorney who believes that corporations must
be responsible for mitigating environmental
damage caused by their profit-making
enterprises. I support enforcement of the

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Environment/sulfate
standard to preserve the
precious environment for
future generations,

Bail Lewellan
glewellan@comcast.net

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- The 10 mg/L sulfate standard for wild rice waters has been law in Minnesota since 1973.
- It was approved by the EPA in 1975.
- In 2011, the Minnesota legislature directed the MPCA to re-evaluate the 10 mg/L standard, and appropriated state funds for a multi-year high-quality scientific study.
- In February, 2014, **the MPCA, based on research conducted by U of M and state research scientists, concluded that the 10 mg/L standard was reasonable and necessary to protect wild rice from sulfate-driven sulfide toxicity, and that the 10 mg/L standard should continue to apply to Minnesota wild rice lakes and streams.**
- One day before release of the findings, political blowback caused MPCA to pause release of its findings, and in June, 2014 the MPCA agreed to investigate an equation-based sulfate standard.
- After conducting extensive research, in 2017 the MPCA proposed replacing the 10 mg/L standard with an equation-based standard. Per the equation, about half of newly calculated water-by-water standards would be below 10 mg/L, and about half would be above 10 mg/L, depending on how much extractable iron was found to be in the sediment of each wild rice water, on the basis of evidence that iron in the sediment scavenged sulfide and in some cases kept it from causing harm to wild rice roots, though that conclusion is contested. Waters with low extractable iron in the sediment thus would have a water-specific sulfate standard below 10 mg/L, and waters with high extractable iron would have a standard above 10 mg/L.
- The best existing statistical analysis of surface water data – sulfate, DOC, Hg, and MeHg - shows that in waters where sediment has high extractable iron, methyl-mercury formation increases linearly with increases in sulfate, meaning that while high iron might protect wild rice, it would lead to more mercury in fish tissue. Many of the wild rice waters are listed as impaired for mercury in fish tissue. Two such receiving waters are O'Brien Lake (WID 31-0032-02), and Swan Lake (WID 31-0067-02). MPCA is in a box with respect to sediment extractable iron. Low iron means low sulfate standard under the equation-based rule, and high iron means high sulfate leads to higher methyl-mercury formation.
- Virtually every party that commented during the rulemaking process opposed the proposed equation-based standard. That includes the mining companies, unions, Iron Range legislators, and mayors of Iron Range cities.
- The ALJ who presided over the contested case hearing on the proposed rule recommended that the proposed rule not be adopted, and left the current existing standard of 10 mg/L in place. The State's Chief ALJ reviewed the ALJ's findings and supported them. The MPCA dropped the equation-based standard. The 10 mg/L standard remains federal and state law today.
- Minnesota likes to think of itself as a law-abiding state, and US Steel likes to say that it is a law-abiding company.
- As the MPCA has pointed out, the company rightly does not qualify for a variance from the standard. The standard must be enforced because it is backed by science as reasonable and necessary to protect wild rice, and the company does not qualify for a variance. It is time to abide by the law.
- I support denial of the US Steel Keetac variance request, and the issuance of the NPDES/SDS permits for the mine/mill facilities and the tailings impoundment.