

Robert Youngman

To Whom It May Concern:

This letter is intended 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. My interests include protecting our environment as well as retaining and expanding mining opportunities.

The Minnesota Pollution Control Agency (MPCA) sulfate water quality standard of 10 mg/L for wild rice waters raises concerns about 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 yet completed this task. The future of Minnesota mines, local governments and other industries are critically affected by the enforcement of the current outdated standard.

I strongly urge MPCA to update the wild rice sulfate standard using 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, water fluctuation, predation, and competing vegetation. 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 citizens at risk with no guaranteed outcome.

Please do not waste time, money and energy on a sulfate standard that does not 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.

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.)
- 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 J. Youngman
605 South 6th Avenue
Virginia, MN 55792
218-741-2557