

Stacy Oltmanns

Hello,

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 also a community member who understands and values the importance of the mining industry to our region. Mining supports families, schools, local businesses, and entire communities across the Iron Range, and its future is directly tied to the decisions being made in these permits.

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 The enforcement of this outdated standard could jeopardize not only the mining industry, but also the stability of local governments and the livelihoods of people who call this region home.

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 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 this arbitrary standard would put Minnesota at risk with no guaranteed outcome.

The current Keetac compliance schedule is also too short and unattainable. There are no commercially proven or economical sulfate treatment strategies available anywhere in the world. Rushing compliance will only lead to costly, ineffective solutions that could cause new environmental harms, such as increased solid waste, energy use, and greenhouse gas emissions. More time is needed to allow for proper evaluation and development of feasible treatment strategies that could benefit all Minnesotans.

In addition, requiring wild rice sulfate compliance at each of Keetac's outfalls does not make scientific sense when they all discharge to the same water body. A single downstream compliance point would be the most accurate and protective measure. MPCA must modify the permits accordingly.

Finally, U.S. Steel's site-specific standard (SSS) requests in 2014 and 2022 followed MPCA's own guidance and provided strong evidence that a higher sulfate standard is appropriate for Hay Lake, where wild rice has thrived for nearly 60 years despite discharges. It is concerning that MPCA has disregarded these applications and failed to take site-specific conditions and modern science into account.

In summary, I urge the MPCA to:

Refrain from including sulfate limits in Keetac's permits. If limits remain, they must be based on a single, scientifically valid compliance point and allow more time for compliance.

Abide by the 2011 law and update the outdated 10 mg/L sulfate standard, which the state has already acknowledged is incorrect.

As a community member who cares about both the environment and the mining industry, I ask the MPCA to make balanced, science-based decisions that protect natural resources while also ensuring the economic stability and future of the Iron Range.

Stacy Oltmanns
Community Member of Gilbert