

Multiple Senders

Email comments regarding variance received from multiple senders 9/5/25

Kneemueller, Ashley (MPCA)

From: annette@everyactioncustom.com on behalf of Annette Drewes
<annette@everyactioncustom.com>
Sent: Friday, September 5, 2025 12:15 PM
To: Kneemueller, Ashley (MPCA)
Subject: RE: U.S. Steel Keetac Mine and Tailings Basin Permits (MN0031879 and MN0055948) and Application for Variance

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Dear Minnesota Pollution Control Agency Staff,

Thank you for the opportunity to comment on the U.S. Steel Keetac Mine and Tailings Basin permits and U.S. Steel's application for a variance. I would like to support the Minnesota Pollution Control Agency (MPCA) and strengthen enforcement of water quality standards that protect Minnesota wild rice, fish, and human health.

For over 20 years I have been involved with wild rice management, harvest and abundance monitoring. Wild rice is simply a canary in the coal mine if you will, for water quality across northern Minnesota. Protecting wild rice waters is not just good for wild rice, but good for all the associated life that lives in, on and depends on wild rice for food. In this case, we have science and research to show what can happen when excess sulfate is released into our waters. We should not have to wait until an entire ecological disaster occurs before putting into place structures and treatments that we know can reduce sulfates, and are economically feasible even if U.S. Steel would rather not spend those dollars.

I support these MPCA actions related to the U.S. Steel Keetac Mine and Tailings Basin Permits:

- 1) I agree with MPCA that U.S. Steel permits should require compliance with Minnesota's wild rice sulfate standard of 10 parts per million (mg/L) at both the Keetac Mine and Tailings Basin. I understand that draft permit limits of 14 mg/L monthly average and 24 mg/L daily maximum are based on this standard.
- 2) I agree with MPCA that U.S. Steel should be denied a variance from compliance with the sulfate standard. A variance is a specific exception to the rules, and U.S. Steel's resistance to the expense of water quality treatment does not provide grounds to avoid the standard.
- 3) I support MPCA's requirement that U.S. Steel monitor waste streams at both the Keetac Mine and Tailings Basin for sulfate and other pollutants. It seems that this should have been required a long time ago.

However, I'm very concerned that the draft permits have some gaps. The permits should be strengthened in the following ways:

- 1) MPCA should not give U.S. Steel another five years before they actually have to meet Minnesota's wild rice sulfate standard. Sulfate limits were set in Keetac permits in 2011, and studies on treatment were done and approved by MPCA

almost a decade ago. MPCA should give U.S. Steel no more than two years to achieve full compliance with wild rice sulfate limits.

2) MPCA should revise the Keetac permits to require groundwater monitoring, especially the groundwater beneath and adjacent to the Tailings Basin. This monitoring is needed to protect groundwater and to help determine if pollutants released through groundwater are causing or adding to violations of surface water standards.

3) MPCA should require U.S. Steel to test wastewater discharge from day one to make sure it is not toxic to aquatic life, rather than waiting for three years before toxicity testing. MPCA should also require new biological assessments the first year of the permit to determine if downstream fish and macroinvertebrates are impaired.

4) In addition to monitoring for sulfate, MPCA should require monitoring for mercury in surface waters and should update testing for mercury in fish tissue downstream of Keetac. Methyl mercury has health implications for humans, something that has had very little coverage as we discuss water pollution from mining activity.

I appreciate the steps MPCA is taking to control sulfate pollution from the U.S. Steel Keetac Mine and Tailings Basin. As a former state employee I understand some of the constraints the agency may be under, however this is not a new issue and the fact that U.S. Steel has done nothing to comply with earlier permits should warrant greater urgency. I would also ask that MPCA revise the draft permits to avoid delay and to better protect groundwater, wild rice, fish, and the health of people who eat fish that are now contaminated with mercury.

Thank you for considering my comments,

Sincerely,

Dr. Annette Drewes

30571 Bluffview Ct Frontenac, MN 55026-1070 annette@annettedrewes.com

Kneemueller, Ashley (MPCA)

From: mdfreak777@everyactioncustom.com on behalf of Brenna Kolstad <mdfreak777@everyactioncustom.com>
Sent: Friday, September 5, 2025 8:24 AM
To: Kneemueller, Ashley (MPCA)
Subject: RE: U.S. Steel Keetac Mine and Tailings Basin Permits (MN0031879 and MN0055948) and Application for Variance

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Dear Minnesota Pollution Control Agency Staff,

I so appreciate the opportunity to comment on the U.S. Steel Keetac Mine and Tailings Basin permits and U.S. Steel's application for a variance. There are a few key takeaways I want to address. First and foremost, I would like to support the Minnesota Pollution Control Agency (MPCA) and strengthen enforcement of water quality standards that protect Minnesota wild rice, fish, and human health.

I support these MPCA actions related to the U.S. Steel Keetac Mine and Tailings Basin Permits:

- 1) I agree with MPCA that U.S. Steel permits should require compliance with Minnesota's wild rice sulfate standard of 10 parts per million (mg/L) at both the Keetac Mine and Tailings Basin. I understand that draft permit limits of 14 mg/L monthly average and 24 mg/L daily maximum are based on this standard.
- 2) I agree with MPCA that U.S. Steel should be denied a variance from compliance with the sulfate standard. A variance is a specific exception to the rules, and U.S. Steel's resistance to the expense of water quality treatment does not provide grounds to avoid the standard.
- 3) I support MPCA's requirement that U.S. Steel monitor waste streams at both the Keetac Mine and Tailings Basin for sulfate and other pollutants. It seems that this should have been required a long time ago.

However, I'm concerned that the draft permits have some gaps. The permits should be strengthened in the following ways:

- 1) MPCA should not give U.S. Steel another five years before they actually have to meet Minnesota's wild rice sulfate standard. Sulfate limits were set in Keetac permits in 2011, and studies on treatment were done and approved by MPCA almost a decade ago. MPCA should give U.S. Steel no more than two years to achieve full compliance with wild rice sulfate limits.
- 2) MPCA should revise the Keetac permits to require groundwater monitoring, especially the groundwater beneath and adjacent to the Tailings Basin. This monitoring is needed to protect groundwater and to help determine if pollutants released through groundwater are causing or adding to violations of surface water standards.

3) MPCA should require U.S. Steel to test wastewater discharge from day one to make sure it is not toxic to aquatic life, rather than waiting for three years before toxicity testing. MPCA should also require new biological assessments the first year of the permit to determine if downstream fish and macroinvertebrates are impaired.

4) In addition to monitoring for sulfate, MPCA should require monitoring for mercury in surface waters and should update testing for mercury in fish tissue downstream of Keetac.

I appreciate the steps MPCA is taking to control sulfate pollution from the U.S. Steel Keetac Mine and Tailings Basin. But I would also ask that MPCA revise the draft permits to avoid delay and to better protect groundwater, wild rice, fish, and the health of people who eat fish that are now contaminated with mercury.

Thank you for your time and reading my comments,

Sincerely,
Brenna Kolstad
133 E Conan St Ely, MN 55731-1237
mdfreak777@yahoo.com

Kneemueller, Ashley (MPCA)

From: waters@everyactioncustom.com on behalf of Lynn Anderson
<waters@everyactioncustom.com>
Sent: Friday, September 5, 2025 5:57 AM
To: Kneemueller, Ashley (MPCA)
Subject: RE: U.S. Steel Keetac Mine and Tailings Basin Permits (MN0031879 and MN0055948) and Application for Variance

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Dear Minnesota Pollution Control Agency Staff,

Thank you for the opportunity to comment on the U.S. Steel Keetac Mine and Tailings Basin permits and U.S. Steel's application for a variance. I would like to support the Minnesota Pollution Control Agency (MPCA) and strengthen enforcement of water quality standards that protect Minnesota wild rice, fish, and human health. Protecting Minnesota's best natural asset-it's abundant waterways matters.

I support these MPCA actions related to the U.S. Steel Keetac Mine and Tailings Basin Permits:

- 1) I agree with MPCA that U.S. Steel permits should require compliance with Minnesota's wild rice sulfate standard of 10 parts per million (mg/L) at both the Keetac Mine and Tailings Basin. I understand that draft permit limits of 14 mg/L monthly average and 24 mg/L daily maximum are based on this standard. This will also maintain a standard for protecting wild rice across the state, especially in abundant wild rice areas.
- 2) I agree with MPCA that U.S. Steel should be denied a variance from compliance with the sulfate standard. A variance is a specific exception to the rules, and U.S. Steel's resistance to the expense of water quality treatment does not provide grounds to avoid the standard. US Steel should spend the money to build a water treatment facility and garner the respect of Minnesotans for environmental stewardship.
- 3) I support MPCA's requirement that U.S. Steel monitor waste streams at both the Keetac Mine and Tailings Basin for sulfate and other pollutants. This should have been required a long time ago. A+ standards should be required to ensure water protections both now and for future generations.

The draft permits have some gaps and should be strengthened in the following ways:

- 1) MPCA should not give U.S. Steel another five years before they actually have to meet Minnesota's wild rice sulfate standard. Sulfate limits were set in Keetac permits in 2011, and studies on treatment were done and approved by MPCA almost a decade ago. MPCA should give U.S. Steel no more than two years to achieve full compliance with wild rice sulfate limits. That is responsible and accountable management.

2) MPCA should revise the Keetac permits to require groundwater monitoring, especially the groundwater beneath and adjacent to the Tailings Basin. This monitoring is needed to protect groundwater and to help determine if pollutants released through groundwater are causing or adding to violations of surface water standards.

3) MPCA should require U.S. Steel to test wastewater discharge from day one to make sure it is not toxic to aquatic life, rather than waiting for three years before toxicity testing. MPCA should also require new biological assessments the first year of the permit to determine if downstream fish and macroinvertebrates are impaired.

4) In addition to monitoring for sulfate, MPCA should require monitoring for mercury in surface waters and should update testing for mercury in fish tissue downstream of Keetac.

I appreciate the steps MPCA is taking to control sulfate pollution from the U.S. Steel Keetac Mine and Tailings Basin. I would also recommend that MPCA revise the draft permits to avoid delay and to implement high standards that protect groundwater, wild rice, fish, and the health of people who eat fish that are now contaminated with mercury.

Thank you for considering my comments,

Sincerely,

Mrs. Lynn Anderson

15621 Goshawk St Tamarack, MN 55787-4486 waters@tamarackwateralliance.org