

Bud Mickelson

As someone whose livelihood is directly tied to Keetac as a supplier of technical professional services, I am deeply concerned about the draft permits. The requirement for sulfate compliance at each outfall is not only scientifically inaccurate but also threatens the operational viability of a facility that has responsibly coexisted with the local environment for decades.

The MPCA's refusal to consider a single downstream compliance point, and its rejection of two SSS applications that followed agency guidance, sends a troubling message to those of us who rely on fair and fact-based regulation. Wild rice continues to grow in Hay Lake, even after nearly 60 years of discharge, which clearly challenges the validity of the 10 mg/L standard.

I urge the MPCA to:

Refrain from including sulfate limits in Keetac's permits. If limits are imposed, they must be based on a single compliance point and allow sufficient time for compliance.

Update the sulfate standard in accordance with the 2011 law and modern scientific evidence.

Sincerely,

Bud Mickelson - TKDA