

Multiple Senders Anonymous Anonymous

See attached document for like-email comments received 8/18/25.

From: [Andrew G](#)
To: [Handeland, Stephanie \(MPCA\)](#)
Subject: Comment on NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Monday, August 18, 2025 2:55:46 PM

You don't often get email from agregg1090@gmail.com. [Learn why this is important](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

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 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 future of Minnesota mines, local governments and other industries are critically affected by the enforcement of this outdated standard.

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 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 at risk with no guaranteed outcome. Do not waste time, money and energy on a sulfate standard that doesn't 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.

The current Keetac compliance schedule is too short and unattainable. There are currently no commercially proven and economical sulfate treatment strategies in place anywhere in the world. Time is needed to evaluate and develop treatment alternatives that are effective and achievable. Since these are some of the first permits to contain the 10 mg/L sulfate limit, other permittees will use the testing and engineering developed for compliance as a model in the future. Current treatment technologies to reduce sulfate levels result in increased solid waste that will be required to be landfilled, increased electrical usage, increased greenhouse gas emissions, and other negative environmental outcomes. Time and careful consideration are needed to develop feasible sulfate treatment that all Minnesotans can benefit from. The MPCA should allow a longer compliance schedule, or grant the variance, to provide more time to effectively find a feasible solution. The current compliance schedule does not include time for regulatory agency requirements such as environmental review, permitting and other authorizations that may be required.

The two draft permits require wild rice sulfate compliance at each of Keetac's outfalls, yet they all discharge to one water body where the MPCA has said the wild rice standard applies. The compliance point should protect that water body and be representative of the combined discharges from the Keetac facility. The permittee requested to combine sulfate compliance points to factually represent offsite discharges, however the MPCA denied that request. It is concerning that the MPCA will not consider the request, even though it is more factually accurate than what is contained in the draft permits. MPCA must modify the permits to include a single downstream compliance point as proposed by the permittee.

U. S. Steel has submitted two site-specific standard (SSS) requests for sulfate at Hay Lake near Keetac. The 2014 request was never acted upon by MPCA and the 2022 request was denied. These applications followed MPCA guidance and show that a higher sulfate standard than 10 mg/L is warranted. It is concerning that the MPCA does not take into account modern science and site-specific conditions. I urge the MPCA to reconsider the SSS applications as Keetac has been discharging to Hay Lake for almost 60 years with healthy wild rice in existence.

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.

To 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.

Andrew Gregg II

16667 Morrow Ave (PO Box 22) Pengilly, MN 55775

Cell 218-969-7830

From: [Johnson, Christopher A](#)
To: [Handeland, Stephanie \(MPCA\)](#)
Subject: Comment on NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Monday, August 18, 2025 12:57:27 PM

You don't often get email from cajohnson@uss.com. [Learn why this is important](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Stephanie

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 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 future of Minnesota mines, local governments and other industries are critically affected by the enforcement of this outdated standard.

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 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 at risk with no guaranteed outcome. Do not waste time, money and energy on a sulfate standard that doesn't 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.

The current Keetac compliance schedule is too short and unattainable. There are currently no commercially proven and economical sulfate treatment strategies in place anywhere in the world. Time is needed to evaluate and develop treatment alternatives that are effective and achievable. Since these are some of the first permits to contain the 10 mg/L sulfate limit, other permittees will use the testing and engineering developed for compliance as a model in the future. Current treatment

technologies to reduce sulfate levels result in increased solid waste that will be required to be landfilled, increased electrical usage, increased greenhouse gas emissions, and other negative environmental outcomes. Time and careful consideration are needed to develop feasible sulfate treatment that all Minnesotans can benefit from. The MPCA should allow a longer compliance schedule, or grant the variance, to provide more time to effectively find a feasible solution. The current compliance schedule does not include time for regulatory agency requirements such as environmental review, permitting and other authorizations that may be required.

The two draft permits require wild rice sulfate compliance at each of Keetac's outfalls, yet they all discharge to one water body where the MPCA has said the wild rice standard applies. The compliance point should protect that water body and be representative of the combined discharges from the Keetac facility. The permittee requested to combine sulfate compliance points to factually represent offsite discharges, however the MPCA denied that request. It is concerning that the MPCA will not consider the request, even though it is more factually accurate than what is contained in the draft permits. MPCA must modify the permits to include a single downstream compliance point as proposed by the permittee.

U. S. Steel has submitted two site-specific standard (SSS) requests for sulfate at Hay Lake near Keetac. The 2014 request was never acted upon by MPCA and the 2022 request was denied. These applications followed MPCA guidance and show that a higher sulfate standard than 10 mg/L is warranted. It is concerning that the MPCA does not take into account modern science and site-specific conditions. I urge the MPCA to reconsider the SSS applications as Keetac has been discharging to Hay Lake for almost 60 years with healthy wild rice in existence.

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.*
- To 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.

Chris A. Johnson
Process Manager II
Keetac Lab

Ph: 218-778-8776

Cell: 218-360-2999

cjohnson@uss.com

DISCLAIMER & CONFIDENTIALITY NOTICE: This email neither constitutes an agreement to conduct transactions by electronic means nor creates any legally binding contract or enforceable obligation in the absence of a fully signed written contract. The information contained in this email and any attachments may be confidential, legally privileged and/or exempt from disclosure under applicable law. It has been sent for the sole use of the intended recipient(s). If the reader of this message is not an intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any unauthorized review, use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. Any inadvertent or accidental disclosure of confidential, legally privileged and/or exempt information contained in this email does not constitute a knowing waiver of any rights regarding such information or materials. If you have received this communication in error, please reply to the sender and destroy all copies of the message (including any attachments).

From: [Ledoux, Dawn E](#)
To: [Handeland, Stephanie \(MPCA\)](#)
Subject: Comment on NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Monday, August 18, 2025 12:55:09 PM

You don't often get email from deledoux@uss.com. [Learn why this is important](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

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 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 future of Minnesota mines, local governments and other industries are critically affected by the enforcement of this outdated standard.

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 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 at risk with no guaranteed outcome. Do not waste time, money and energy on a sulfate standard that doesn't 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.

The current Keetac compliance schedule is too short and unattainable. There are currently no commercially proven and economical sulfate treatment strategies in place anywhere in the world. Time is needed to evaluate and develop treatment alternatives that are effective and achievable. Since these are some of the first permits to contain the 10 mg/L sulfate limit, other permittees will use the testing and engineering developed for compliance as a model in the future. Current treatment technologies to reduce sulfate levels result in increased solid waste that will be required to be landfilled, increased electrical usage, increased greenhouse gas emissions, and other negative environmental outcomes. Time and careful consideration are needed to develop feasible sulfate treatment that all Minnesotans can benefit from. The MPCA

should allow a longer compliance schedule, or grant the variance, to provide more time to effectively find a feasible solution. The current compliance schedule does not include time for regulatory agency requirements such as environmental review, permitting and other authorizations that may be required.

The two draft permits require wild rice sulfate compliance at each of Keetac's outfalls, yet they all discharge to one water body where the MPCA has said the wild rice standard applies. The compliance point should protect that water body and be representative of the combined discharges from the Keetac facility. The permittee requested to combine sulfate compliance points to factually represent offsite discharges, however the MPCA denied that request. It is concerning that the MPCA will not consider the request, even though it is more factually accurate than what is contained in the draft permits. MPCA must modify the permits to include a single downstream compliance point as proposed by the permittee.

U. S. Steel has submitted two site-specific standard (SSS) requests for sulfate at Hay Lake near Keetac. The 2014 request was never acted upon by MPCA and the 2022 request was denied. These applications followed MPCA guidance and show that a higher sulfate standard than 10 mg/L is warranted. It is concerning that the MPCA does not take into account modern science and site-specific conditions. I urge the MPCA to reconsider the SSS applications as Keetac has been discharging to Hay Lake for almost 60 years with healthy wild rice in existence.

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.*
- To 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,

Dawn LeDoux
30626 West Shore Drive
Pengilly, MN 55775
218-969-8495

DISCLAIMER & CONFIDENTIALITY NOTICE: This email neither constitutes an agreement to conduct transactions by electronic means nor creates any legally binding contract or enforceable obligation in the absence of a fully signed written contract. The information contained in this email and any attachments may be confidential, legally privileged and/or exempt from disclosure under applicable law. It has been sent for the sole use of the intended recipient(s). If the reader of this message is not an intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any unauthorized review, use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. Any inadvertent or

accidental disclosure of confidential, legally privileged and/or exempt information contained in this email does not constitute a knowing waiver of any rights regarding such information or materials. If you have received this communication in error, please reply to the sender and destroy all copies of the message (including any attachments).

From: [Maki, Jaron L](#)
To: [Handeland, Stephanie \(MPCA\)](#)
Subject: Comment on NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Monday, August 18, 2025 2:43:18 PM

You don't often get email from jlmaki@uss.com. [Learn why this is important](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

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 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 future of Minnesota mines, local governments and other industries are critically affected by the enforcement of this outdated standard.

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 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 at risk with no guaranteed outcome. Do not waste time, money and energy on a sulfate standard that doesn't 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.

The current Keetac compliance schedule is too short and unattainable. There are currently no commercially proven and economical sulfate treatment strategies in place anywhere in the world. Time is needed to evaluate and develop treatment alternatives that are effective and achievable. Since these are some of the first permits to contain the 10 mg/L sulfate limit, other permittees will use the testing and engineering developed for compliance as a model in the future. Current treatment technologies to reduce sulfate levels result in increased solid waste that will be required to be landfilled, increased electrical usage, increased greenhouse gas emissions, and other negative environmental outcomes. Time and careful

consideration are needed to develop feasible sulfate treatment that all Minnesotans can benefit from. The MPCA should allow a longer compliance schedule, or grant the variance, to provide more time to effectively find a feasible solution. The current compliance schedule does not include time for regulatory agency requirements such as environmental review, permitting and other authorizations that may be required.

The two draft permits require wild rice sulfate compliance at each of Keetac's outfalls, yet they all discharge to one water body where the MPCA has said the wild rice standard applies. The compliance point should protect that water body and be representative of the combined discharges from the Keetac facility. The permittee requested to combine sulfate compliance points to factually represent offsite discharges, however the MPCA denied that request. It is concerning that the MPCA will not consider the request, even though it is more factually accurate than what is contained in the draft permits. MPCA must modify the permits to include a single downstream compliance point as proposed by the permittee.

U. S. Steel has submitted two site-specific standard (SSS) requests for sulfate at Hay Lake near Keetac. The 2014 request was never acted upon by MPCA and the 2022 request was denied. These applications followed MPCA guidance and show that a higher sulfate standard than 10 mg/L is warranted. It is concerning that the MPCA does not take into account modern science and site-specific conditions. I urge the MPCA to reconsider the SSS applications as Keetac has been discharging to Hay Lake for almost 60 years with healthy wild rice in existence.

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.*
- To 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.

Jaron L. Maki

Address: 8780 Forest Dr, Mountian Iron, MN 55768

Phone: 218-749-7471

Email: JLMaki@uss.com

DISCLAIMER & CONFIDENTIALITY NOTICE: This email neither constitutes an agreement to conduct transactions by electronic means nor creates any legally binding contract or enforceable obligation in the absence of a fully signed written contract. The information contained in this email and any attachments may be confidential, legally privileged and/or exempt from disclosure under applicable law. It has been sent for the sole use of the intended recipient(s). If the reader of this message is not an intended recipient, or the employee or

agent responsible for delivering the message to the intended recipient, you are hereby notified that any unauthorized review, use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. Any inadvertent or accidental disclosure of confidential, legally privileged and/or exempt information contained in this email does not constitute a knowing waiver of any rights regarding such information or materials. If you have received this communication in error, please reply to the sender and destroy all copies of the message (including any attachments).

From: [jake friend](#)
To: [Handeland, Stephanie \(MPCA\)](#)
Subject: NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Monday, August 18, 2025 2:55:35 PM

You don't often get email from jakefriend9@yahoo.com. [Learn why this is important](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

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 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 future of Minnesota mines, local governments and other industries are critically affected by the enforcement of this outdated standard.

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 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 at risk with no guaranteed outcome. Do not waste time, money and energy on a sulfate standard that doesn't 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.

The current Keetac compliance schedule is too short and unattainable. There are currently no commercially proven and economical sulfate treatment strategies in place anywhere in the world. Time is needed to evaluate and develop treatment alternatives that are effective and achievable. Since these are some of the first permits to contain the 10 mg/L sulfate limit, other permittees will use the testing and engineering developed for compliance as a model in the future. Current treatment technologies to reduce sulfate levels result in increased solid waste that will be required to be landfilled, increased electrical usage, increased greenhouse gas emissions, and other negative environmental outcomes. Time and careful consideration are needed to develop feasible sulfate treatment that all Minnesotans can benefit from. The MPCA should allow a longer compliance schedule, or grant the variance, to provide more time to effectively find a feasible solution. The current compliance schedule does not include time for regulatory agency requirements such as environmental review, permitting and other authorizations that may be required.

The two draft permits require wild rice sulfate compliance at each of Keetac's outfalls, yet they all discharge to one water body where the MPCA has said the wild rice standard applies. The compliance point should protect that water body and be representative of the combined discharges from the Keetac facility. The permittee requested to combine sulfate compliance points to factually represent offsite discharges, however the MPCA denied that request. It is concerning that the MPCA will not consider the request, even though it is more factually accurate than what is contained in the draft permits. MPCA must modify the permits to include a single downstream compliance point as proposed by the permittee.

U. S. Steel has submitted two site-specific standard (SSS) requests for sulfate at Hay Lake near Keetac. The 2014 request was never acted upon by MPCA and the 2022 request was denied. These applications followed MPCA guidance and show that a higher sulfate standard than 10 mg/L is warranted. It is concerning that the MPCA does not take into account modern science and site-specific conditions. I urge the MPCA to reconsider the SSS applications as Keetac has been discharging to Hay Lake for almost 60 years with healthy wild rice in existence.

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.

To 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.

Jacob Friend
President Local 2660 (Keetac)

3668 Rainey Rd.
Hibbing, MN 55746

jakefriend9@yahoo.com
(218) 966-6271

[Yahoo Mail: Search, Organize, Conquer](#)

From: [Jarvi, James P](#)
To: [Handeland, Stephanie \(MPCA\)](#)
Subject: Comment on NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Monday, August 18, 2025 2:14:32 PM

You don't often get email from jpjarvi@uss.com. [Learn why this is important](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

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 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 future of Minnesota mines, local governments and other industries are critically affected by the enforcement of this outdated standard.

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 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 at risk with no guaranteed outcome. Do not waste time, money and energy on a sulfate standard that doesn't 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.

The current Keetac compliance schedule is too short and unattainable. There are currently no commercially proven and economical sulfate treatment strategies in place anywhere in the world. Time is needed to evaluate and develop treatment alternatives that are effective and achievable. Since these are some of the first permits to contain the 10 mg/L sulfate limit, other permittees will use the testing and engineering developed for compliance as a model in the future. Current treatment technologies to reduce sulfate levels result in increased solid waste that will be required to be landfilled, increased electrical usage, increased greenhouse gas emissions, and other negative environmental outcomes. Time and careful

consideration are needed to develop feasible sulfate treatment that all Minnesotans can benefit from. The MPCA should allow a longer compliance schedule, or grant the variance, to provide more time to effectively find a feasible solution. The current compliance schedule does not include time for regulatory agency requirements such as environmental review, permitting and other authorizations that may be required.

The two draft permits require wild rice sulfate compliance at each of Keetac's outfalls, yet they all discharge to one water body where the MPCA has said the wild rice standard applies. The compliance point should protect that water body and be representative of the combined discharges from the Keetac facility. The permittee requested to combine sulfate compliance points to factually represent offsite discharges, however the MPCA denied that request. It is concerning that the MPCA will not consider the request, even though it is more factually accurate than what is contained in the draft permits. MPCA must modify the permits to include a single downstream compliance point as proposed by the permittee.

U. S. Steel has submitted two site-specific standard (SSS) requests for sulfate at Hay Lake near Keetac. The 2014 request was never acted upon by MPCA and the 2022 request was denied. These applications followed MPCA guidance and show that a higher sulfate standard than 10 mg/L is warranted. It is concerning that the MPCA does not take into account modern science and site-specific conditions. I urge the MPCA to reconsider the SSS applications as Keetac has been discharging to Hay Lake for almost 60 years with healthy wild rice in existence.

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.*
- To 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.

James Jarvi

James P. Jarvi
Director of Customer Quality, Pellet Movement & Technology
United States Steel
Minnesota Ore Operations
8771 Park Ridge Drive
Mt Iron, MN 55768

Office (218) 749-7237

Cell (218) 929-2651

DISCLAIMER & CONFIDENTIALITY NOTICE: This email neither constitutes an agreement to conduct transactions by electronic means nor creates any legally binding contract or enforceable obligation in the absence of a fully signed written contract. The information contained in this email and any attachments may be confidential, legally privileged and/or exempt from disclosure under applicable law. It has been sent for the sole use of the intended recipient(s). If the reader of this message is not an intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any unauthorized review, use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. Any inadvertent or accidental disclosure of confidential, legally privileged and/or exempt information contained in this email does not constitute a knowing waiver of any rights regarding such information or materials. If you have received this communication in error, please reply to the sender and destroy all copies of the message (including any attachments).

From: [Jodi Pohto](#)
To: [Handeland, Stephanie \(MPCA\)](#)
Subject: Comment on NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Monday, August 18, 2025 12:55:48 PM

You don't often get email from jpohto@icloud.com. [Learn why this is important](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

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 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 future of Minnesota mines, local governments and other industries are critically affected by the enforcement of this outdated standard.

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 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 at risk with no guaranteed outcome. Do not waste time, money and energy on a sulfate standard that doesn't 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.

The current Keetac compliance schedule is too short and unattainable. There are currently no commercially proven and economical sulfate treatment strategies in place anywhere in the world. Time is needed to evaluate and develop treatment alternatives that are effective and achievable. Since these are some of the first permits to contain the 10 mg/L sulfate limit, other permittees will use the testing and engineering developed for compliance as a model in the future. Current treatment technologies to reduce sulfate levels result in increased solid waste that will be required to be landfilled, increased electrical usage, increased greenhouse gas emissions, and other negative environmental outcomes. Time and careful consideration are needed to develop feasible sulfate treatment that all Minnesotans can benefit from. The MPCA should allow a longer compliance schedule, or grant the variance, to provide more time to effectively find a feasible solution. The current compliance schedule does not include time for regulatory agency requirements such as environmental review, permitting and other authorizations that may be required.

The two draft permits require wild rice sulfate compliance at each of Keetac's outfalls, yet they all discharge to one water body where the MPCA has said the wild rice standard applies. The compliance point should protect that water body and be representative of the combined discharges from the Keetac facility. The permittee requested to combine sulfate compliance points to factually represent offsite discharges, however the MPCA denied that request. It is concerning that the MPCA will not consider the request, even though it is more factually accurate than what is contained in the draft permits. MPCA must modify the permits to include a single downstream compliance point as proposed by the permittee.

U. S. Steel has submitted two site-specific standard (SSS) requests for sulfate at Hay Lake near Keetac. The 2014 request was never acted upon by MPCA and the 2022 request was denied. These applications followed MPCA guidance and show that a higher sulfate standard than 10 mg/L is warranted. It is concerning that the MPCA does not take into account modern science and site-specific conditions. I urge the MPCA to reconsider the SSS applications as Keetac has been discharging to Hay Lake for almost 60 years with healthy wild rice in existence.

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.*
- To 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.

Jodi Pohto

9001 Highway 53

Angora, MN 55703

218-780-1704

Sent from my iPhone

From: [Justin Savaloja](#)
To: [Handeland, Stephanie \(MPCA\)](#)
Subject: Comment on NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Monday, August 18, 2025 2:55:54 PM

You don't often get email from jutsavi@yahoo.com. [Learn why this is important](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

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 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 future of Minnesota mines, local governments and other industries are critically affected by the enforcement of this outdated standard.

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 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 at risk with no guaranteed outcome. Do not waste time, money and energy on a sulfate standard that doesn't 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.

The current Keetac compliance schedule is too short and unattainable. There are currently no commercially proven and economical sulfate treatment strategies in place anywhere in the world. Time is needed to evaluate and develop treatment alternatives that are effective and achievable. Since these are some of the first permits to contain the 10 mg/L sulfate limit, other permittees will use the testing and engineering developed for compliance as a model in the future. Current treatment technologies to reduce sulfate levels result in increased solid waste that will be required to be landfilled, increased electrical usage, increased greenhouse gas emissions, and other negative environmental outcomes. Time and careful consideration are needed to develop feasible sulfate treatment that all Minnesotans can benefit from. The MPCA should allow a longer compliance schedule, or grant the variance, to provide more time to effectively find a feasible solution. The current compliance schedule does not include time for regulatory agency requirements such as environmental review, permitting and other authorizations that may be required.

The two draft permits require wild rice sulfate compliance at each of Keetac's outfalls, yet they all discharge to one water body where the MPCA has said the wild rice standard applies. The compliance point should protect that water body and be representative of the combined

discharges from the Keetac facility. The permittee requested to combine sulfate compliance points to factually represent offsite discharges, however the MPCA denied that request. It is concerning that the MPCA will not consider the request, even though it is more factually accurate than what is contained in the draft permits. MPCA must modify the permits to include a single downstream compliance point as proposed by the permittee.

U. S. Steel has submitted two site-specific standard (SSS) requests for sulfate at Hay Lake near Keetac. The 2014 request was never acted upon by MPCA and the 2022 request was denied. These applications followed MPCA guidance and show that a higher sulfate standard than 10 mg/L is warranted. It is concerning that the MPCA does not take into account modern science and site-specific conditions. I urge the MPCA to reconsider the SSS applications as Keetac has been discharging to Hay Lake for almost 60 years with healthy wild rice in existence.

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.*
- To 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.

Justin Savaloja
19794 County Road 70
Bovey, MN 55709
jutsavi@yahoo.com
Sent from my iPhone

From: [Kathy Spolarich](#)
To: [Handeland, Stephanie \(MPCA\)](#)
Subject: : Comment on NPDES permits MN0055948 and MN
Date: Monday, August 18, 2025 2:55:44 PM

You don't often get email from cassi1962@yahoo.com. [Learn why this is important](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

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 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 future of Minnesota mines, local governments and other industries are critically affected by the enforcement of this outdated standard.

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 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 at risk with no guaranteed outcome. Do not waste time, money and energy on a sulfate standard that doesn't 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.

The current Keetac compliance schedule is too short and unattainable. There are currently no commercially proven and economical sulfate treatment strategies in place anywhere in the world. Time is needed to evaluate and develop treatment alternatives that are effective and achievable. Since these are some of the first permits to contain the 10 mg/L sulfate limit, other permittees will use the testing and engineering developed for compliance as a model in the future. Current treatment technologies to reduce sulfate levels result in increased solid waste that will be required to be landfilled, increased electrical usage, increased greenhouse gas emissions, and other negative environmental outcomes. Time and careful consideration are needed to develop feasible sulfate treatment that all Minnesotans can benefit from. The MPCA should allow a longer compliance schedule, or grant the variance, to provide more time to effectively find a feasible solution. The current compliance schedule does not include time for regulatory agency requirements such as environmental review, permitting and other authorizations that may be required.

The two draft permits require wild rice sulfate compliance at each of Keetac's outfalls, yet they all

discharge to one water body where the MPCA has said the wild rice standard applies. The compliance point should protect that water body and be representative of the combined discharges from the Keetac facility. The permittee requested to combine sulfate compliance points to factually represent offsite discharges, however the MPCA denied that request. It is concerning that the MPCA will not consider the request, even though it is more factually accurate than what is contained in the draft permits. MPCA must modify the permits to include a single downstream compliance point as proposed by the permittee.

U. S. Steel has submitted two site-specific standard (SSS) requests for sulfate at Hay Lake near Keetac. The 2014 request was never acted upon by MPCA and the 2022 request was denied. These applications followed MPCA guidance and show that a higher sulfate standard than 10 mg/L is warranted. It is concerning that the MPCA does not take into account modern science and site-specific conditions. I urge the MPCA to reconsider the SSS applications as Keetac has been discharging to Hay Lake for almost 60 years with healthy wild rice in existence.

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.*
- To 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.

Kathy Spolarich

PO Box 291

Keewatin MN 55753

Sent from my iPhone

From: millwrightmike84@gmail.com
To: [Handeland, Stephanie \(MPCA\)](#)
Subject: Comment on NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Monday, August 18, 2025 2:55:52 PM

You don't often get email from millwrightmike84@gmail.com. [Learn why this is important](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Sent from my iPhone 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 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 future of Minnesota mines, local governments and other industries are critically affected by the enforcement of this outdated standard.

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 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 at risk with no guaranteed outcome. Do not waste time, money and energy on a sulfate standard that doesn't 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.

The current Keetac compliance schedule is too short and unattainable. There are currently no commercially proven and economical sulfate treatment strategies in place anywhere in the world. Time is needed to evaluate and develop treatment alternatives that are effective and achievable. Since these are some of the first permits to contain the 10 mg/L sulfate limit, other permittees will use the testing and engineering developed for compliance as a model in the future. Current treatment technologies to reduce sulfate levels result in increased solid waste that will be required to be landfilled, increased electrical usage, increased greenhouse gas emissions, and other negative environmental outcomes. Time and careful consideration are needed to develop feasible sulfate treatment that all Minnesotans can benefit from. The MPCA should allow a longer compliance schedule, or grant the variance, to provide more time to effectively find a feasible solution. The current compliance schedule does not include time for regulatory agency requirements such as environmental review, permitting and other authorizations that may be required.

The two draft permits require wild rice sulfate compliance at each of Keetac's outfalls, yet they all

discharge to one water body where the MPCA has said the wild rice standard applies. The compliance point should protect that water body and be representative of the combined discharges from the Keetac facility. The permittee requested to combine sulfate compliance points to factually represent offsite discharges, however the MPCA denied that request. It is concerning that the MPCA will not consider the request, even though it is more factually accurate than what is contained in the draft permits. MPCA must modify the permits to include a single downstream compliance point as proposed by the permittee.

U. S. Steel has submitted two site-specific standard (SSS) requests for sulfate at Hay Lake near Keetac. The 2014 request was never acted upon by MPCA and the 2022 request was denied. These applications followed MPCA guidance and show that a higher sulfate standard than 10 mg/L is warranted. It is concerning that the MPCA does not take into account modern science and site-specific conditions. I urge the MPCA to reconsider the SSS applications as Keetac has been discharging to Hay Lake for almost 60 years with healthy wild rice in existence.

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.*
- To abide by the 2011 law and update the 10 mg/L sulfate standard that the state of Minnesota has recognized as being incorrect.*

Micheal Wilson
109 5th ave s Biwabik MN
2182485687

From: [Tilander, Russell M](#)
To: [Handeland, Stephanie \(MPCA\)](#)
Cc: [Bakk, Michael T](#)
Subject: Comment on NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Monday, August 18, 2025 3:16:34 PM

You don't often get email from rmtilander@uss.com. [Learn why this is important](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

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 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 future of Minnesota mines, local governments and other industries are critically affected by the enforcement of this outdated standard.

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 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 at risk with no guaranteed outcome. Do not waste time, money and energy on a sulfate standard that doesn't 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.

The current Keetac compliance schedule is too short and unattainable. There are currently no commercially proven and economical sulfate treatment strategies in place anywhere in the world. Time is needed to evaluate and develop treatment alternatives that are effective and achievable. Since these are some of the first permits to contain the 10 mg/L sulfate limit, other permittees will use the testing and engineering developed for compliance as a model in the future. Current treatment technologies to reduce sulfate levels result in increased solid waste that will be required to be landfilled, increased electrical usage, increased greenhouse gas emissions, and other negative environmental outcomes. Time and careful

consideration are needed to develop feasible sulfate treatment that all Minnesotans can benefit from. The MPCA should allow a longer compliance schedule, or grant the variance, to provide more time to effectively find a feasible solution. The current compliance schedule does not include time for regulatory agency requirements such as environmental review, permitting and other authorizations that may be required.

The two draft permits require wild rice sulfate compliance at each of Keetac's outfalls, yet they all discharge to one water body where the MPCA has said the wild rice standard applies. The compliance point should protect that water body and be representative of the combined discharges from the Keetac facility. The permittee requested to combine sulfate compliance points to factually represent offsite discharges, however the MPCA denied that request. It is concerning that the MPCA will not consider the request, even though it is more factually accurate than what is contained in the draft permits. MPCA must modify the permits to include a single downstream compliance point as proposed by the permittee.

U. S. Steel has submitted two site-specific standard (SSS) requests for sulfate at Hay Lake near Keetac. The 2014 request was never acted upon by MPCA and the 2022 request was denied. These applications followed MPCA guidance and show that a higher sulfate standard than 10 mg/L is warranted. It is concerning that the MPCA does not take into account modern science and site-specific conditions. I urge the MPCA to reconsider the SSS applications as Keetac has been discharging to Hay Lake for almost 60 years with healthy wild rice in existence.

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.*
- To 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,

Russ Tilander - 933 2nd Ave PO Box 302 Littlefork, MN 56653 Cell: 518-338-9582

contained in this email and any attachments may be confidential, legally privileged and/or exempt from disclosure under applicable law. It has been sent for the sole use of the intended recipient(s). If the reader of this message is not an intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any unauthorized review, use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. Any inadvertent or accidental disclosure of confidential, legally privileged and/or exempt information contained in this email does not constitute a knowing waiver of any rights regarding such information or materials. If you have received this communication in error, please reply to the sender and destroy all copies of the message (including any attachments).

From: [Terry Craven](#)
To: [Handeland, Stephanie \(MPCA\)](#)
Subject: Comment on NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Monday, August 18, 2025 2:55:56 PM

You don't often get email from tercra124@gmail.com. [Learn why this is important](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

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 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 future of Minnesota mines, local governments and other industries are critically affected by the enforcement of this outdated standard.

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 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 at risk with no guaranteed outcome. Do not waste time, money and energy on a sulfate standard that doesn't 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.

The current Keetac compliance schedule is too short and unattainable. There are currently no commercially proven and economical sulfate treatment strategies in place anywhere in the world. Time is needed to evaluate and develop treatment alternatives that are effective and achievable. Since these are some of the first permits to contain the 10 mg/L sulfate limit, other permittees will use the testing and engineering developed for compliance as a model in the future. Current treatment technologies to reduce sulfate levels result in increased solid waste that will be required to be landfilled, increased electrical usage, increased greenhouse gas emissions, and other negative environmental outcomes. Time and careful consideration are needed to develop feasible sulfate treatment that all Minnesotans can benefit from. The MPCA should allow a longer compliance schedule, or grant the variance, to provide more time to effectively find a feasible solution. The current compliance schedule does not include time for regulatory agency requirements such as environmental review, permitting and other authorizations that may be required.

The two draft permits require wild rice sulfate compliance at each of Keetac's outfalls, yet they all

discharge to one water body where the MPCA has said the wild rice standard applies. The compliance point should protect that water body and be representative of the combined discharges from the Keetac facility. The permittee requested to combine sulfate compliance points to factually represent offsite discharges, however the MPCA denied that request. It is concerning that the MPCA will not consider the request, even though it is more factually accurate than what is contained in the draft permits. MPCA must modify the permits to include a single downstream compliance point as proposed by the permittee.

U. S. Steel has submitted two site-specific standard (SSS) requests for sulfate at Hay Lake near Keetac. The 2014 request was never acted upon by MPCA and the 2022 request was denied. These applications followed MPCA guidance and show that a higher sulfate standard than 10 mg/L is warranted. It is concerning that the MPCA does not take into account modern science and site-specific conditions. I urge the MPCA to reconsider the SSS applications as Keetac has been discharging to Hay Lake for almost 60 years with healthy wild rice in existence.

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.*
- To 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.

Terry Craven
Gilbert, MN 55741

From: [Tawnya Gustafson](#)
To: [Handeland, Stephanie \(MPCA\)](#)
Subject: Sulfate
Date: Monday, August 18, 2025 2:55:49 PM

You don't often get email from tawnyagustafson@yahoo.com. [Learn why this is important](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

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 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 future of Minnesota mines, local governments and other industries are critically affected by the enforcement of this outdated standard.

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 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 at risk with no guaranteed outcome. Do not waste time, money and energy on a sulfate standard that doesn't 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.

The current Keetac compliance schedule is too short and unattainable. There are currently no commercially proven and economical sulfate treatment strategies in place anywhere in the world. Time is needed to evaluate and develop treatment alternatives that are effective and achievable. Since these are some of the first permits to contain the 10 mg/L sulfate limit, other permittees will use the testing and engineering developed for compliance as a model in the future. Current treatment technologies to reduce sulfate levels result in increased solid waste that will be required to be landfilled, increased electrical usage, increased greenhouse gas emissions, and other negative environmental outcomes. Time and careful consideration are needed to develop feasible sulfate treatment that all Minnesotans can benefit from. The MPCA should allow a longer compliance schedule, or grant the variance, to provide more time to effectively find a feasible solution. The current compliance schedule does not include time for regulatory agency requirements such as environmental review, permitting and other authorizations that may be required.

The two draft permits require wild rice sulfate compliance at each of Keetac's outfalls, yet they all

discharge to one water body where the MPCA has said the wild rice standard applies. The compliance point should protect that water body and be representative of the combined discharges from the Keetac facility. The permittee requested to combine sulfate compliance points to factually represent offsite discharges, however the MPCA denied that request. It is concerning that the MPCA will not consider the request, even though it is more factually accurate than what is contained in the draft permits. MPCA must modify the permits to include a single downstream compliance point as proposed by the permittee.

U. S. Steel has submitted two site-specific standard (SSS) requests for sulfate at Hay Lake near Keetac. The 2014 request was never acted upon by MPCA and the 2022 request was denied. These applications followed MPCA guidance and show that a higher sulfate standard than 10 mg/L is warranted. It is concerning that the MPCA does not take into account modern science and site-specific conditions. I urge the MPCA to reconsider the SSS applications as Keetac has been discharging to Hay Lake for almost 60 years with healthy wild rice in existence.

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.*
- To 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,
Tawnya Gustafson
403 Rainey Rd
Kelly Lake,
MN
55746
218-966-0701
Sent from my iPhone