

# **EXHIBIT 228A**

**Handeland, Stephanie (MPCA)**

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**From:** Christie Kearney <ckearney@polymetminning.com>  
**Sent:** Monday, December 11, 2017 1:05 PM  
**To:** Clark, Richard (MPCA); Handeland, Stephanie (MPCA)  
**Cc:** Greg Fontaine; Keith Hanson  
**Subject:** RE: PolyMet's Comments on Draft Permit and Draft Fact Sheet  
**Attachments:** 000-DRAFT WQ Permit (draft 11-29-17) with PolyMet comments 12-10-2017 monitoring.docx

Richard and Stephanie,

I am resubmitting our comments on the draft permit due to formatting issues with Table 1 and the tables on the Monitoring Section (which starts on Page 75 of 112). The formatting of these tables were messed up in our submittal last night.

Christie

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**From:** Clark, Richard (MPCA) [mailto:richard.clark@state.mn.us]  
**Sent:** Monday, December 11, 2017 11:46 AM  
**To:** Christie Kearney <ckearney@polymetminning.com>  
**Subject:** RE: PolyMet's Comments on Draft Permit and Draft Fact Sheet

Yes, please send an updated version of the permit without the unintended revisions. That will make our internal considerations on what monitoring reductions we can do a lot quicker and easier. Thanks.

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**From:** Christie Kearney [mailto:ckearney@polymetminning.com]  
**Sent:** Monday, December 11, 2017 10:19 AM  
**To:** Clark, Richard (MPCA) <richard.clark@state.mn.us>  
**Subject:** RE: PolyMet's Comments on Draft Permit and Draft Fact Sheet

Richard, just an FYI. I'm looking through what I submitted last night and realized that for some reason, it deleted some of the tables from the monitoring section (which starts on Page 75 of 112) and then reinserted them. I had not intended to make any changes to the tables in that section with the exception of highlighting the constituents that are discussed in our separate memo. I apologize for this oversight. Let me know if you want me to fix that and resend.

Christie

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**From:** Clark, Richard (MPCA) [mailto:richard.clark@state.mn.us]  
**Sent:** Monday, December 11, 2017 8:09 AM  
**To:** Christie Kearney <ckearney@polymetminning.com>  
**Subject:** RE: PolyMet's Comments on Draft Permit and Draft Fact Sheet

Good morning,

There appears to be a lot of comments for us to consider – many of them look to be relatively straight forward but also several areas that may be more difficult or time consuming. To aid tomorrow's discussion, it would help if you could identify and prioritize the top 'subject areas' for PolyMet, considering (a) the relative importance of the issue to PolyMet and (b) your perspective on the degree of Agency management 'decision making' that may need to be involved. We should try to focus on those areas tomorrow.

If we could get that list today, that would be helpful.

Thanks!

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**From:** Christie Kearney [<mailto:ckearney@polymetmining.com>]  
**Sent:** Sunday, December 10, 2017 10:06 PM  
**To:** Clark, Richard (MPCA) <[richard.clark@state.mn.us](mailto:richard.clark@state.mn.us)>; Handeland, Stephanie (MPCA) <[stephanie.handeland@state.mn.us](mailto:stephanie.handeland@state.mn.us)>  
**Cc:** Greg Fontaine <[greg.fontaine@stoel.com](mailto:greg.fontaine@stoel.com)>; Keith Hanson <[khanson@barr.com](mailto:khanson@barr.com)>  
**Subject:** Re: PolyMet's Comments on Draft Permit and Draft Fact Sheet

Due to the size of this submittal, please confirm receipt. Thank you!

Christie

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**From:** Christie Kearney  
**Sent:** Sunday, December 10, 2017 10:05:04 PM  
**To:** Richard Clark; Stephanie Handeland  
**Cc:** Greg Fontaine; Keith Hanson  
**Subject:** PolyMet's Comments on Draft Permit and Draft Fact Sheet

Richard and Stephanie,

Attached are PolyMet's comments on the following items:

- NorthMet draft permit
- NorthMet draft fact sheet
- NorthMet draft HRF permit section (provided separately)

I am also attaching a technical memorandum associated with our position on the proposed monitoring, including a request for changes on the proposed monitoring and the technical justification for these requested changes.

Give me a call if you have questions. Thank you!

Christie