



David McCall
International President

September 19, 2025

Submitted via: <https://mpca.commentinput.com/>

Minnesota Pollution Control Agency
Stephanie Handeland
520 Lafayette Road North
St. Paul, MN 55155

RE: United Steelworkers comments on U.S. Steel Corp – Keetac – Wastewater Permit.

Dear Ms. Handeland:

These comments are submitted on behalf of the 850,000 members of the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union (United Steelworkers or USW).

Additionally, oral testimony was delivered by a wide representation of miners at the public hearing held on September 3, including USW Local Union Presidents Chad Daniels, Jake Friend, Steve Bonach, Cliff Tobey, and Al King.

We proudly represent thousands of hardworking, highly skilled men and women across a wide range of industries — including Minnesota's iron mining sector. Our members take great pride in their vital contributions to America's economy and national security, all while safeguarding the environment in the communities where they live, work, and raise their families. United Steelworkers supports the requested variance by U.S. Steel for sulfate levels for water used for the production of wild rice and opposes the Minnesota Pollution Control Agency's (MPCA) preliminary decision to deny the variance request.

USW is committed to upholding strong environmental standards and advocating for family-sustaining wages. As a co-founder of the BlueGreen Alliance (BGA) and an active board member of the Initiative for Responsible Mining Assurance (IRMA), USW continues to lead in promoting responsible mining practices.

In collaboration with the Keetac mine in Minnesota, we believe the current sulfate standard of 10 milligrams per liter (mg/L) is not realistically achievable by 2030. We respectfully urge that further scientific research be conducted before implementing this standard to ensure both environmental protection and economic viability. We request

MPCA to re-evaluate the variance request and grant it. These are the reasons listed below.

Keetac Community Impact

U.S. Steel's Minnesota Ore Operations play a significant role in the state's economy, directly employing approximately 1,938 individuals. In 2023, the company hired 161 new employees. The company's annual payroll totals around \$200 million, with approximately \$41 million allocated to health care benefits and \$20 million to pension benefits, including \$13 million contributed to the Steelworkers Pension Trust.

Beyond employment, U.S. Steel contributes significantly to public funding and community support. In 2023, the company paid \$59 million in taconite production taxes. It also provides roughly 90 percent of the royalty payments to the Minnesota School Trust, which can range from \$10 million to over \$50 million annually depending on production levels. Halting Keetac's operations would put hundreds of good jobs at risk and cut off key funding that local communities and schools depend on — threatening Minnesota's economic future.

Keetac's Action

U.S. Steel has actively engaged in efforts to address sulfate standards and protect wild rice waters in Minnesota over the past decade. In 2011, the company participated in the MPCA Citizens Advisory Group, followed by collaboration with the Minnesota Chamber on wild rice research in 2012 and 2013. In 2014, U.S. Steel submitted a Site-Specific Standard (SSS) request for Hay Lake, seeking an alternative sulfate limit, but it was ultimately denied. The company also conducted sulfate treatment pilot testing at its Keetac facility in 2016 and took part in MPCA's wild rice rulemaking process in 2017. From 2018 to 2019, U.S. Steel was represented on Governor Dayton's Wild Rice Task Force, contributing to broader policy discussions.

History of Sulfate Standard

Minnesota's legislative involvement with wild rice sulfate standards began in 1973 when the MPCA adopted a rule limiting sulfate concentrations to 10 mg/L in waters designated for wild rice production. This rule was based on early research by John Moyle and was approved by the U.S. Environmental Protection Agency (EPA) under the Clean Water Act. The standard aimed to protect wild rice, a culturally and ecologically significant plant, especially for Indigenous communities in the state.

Over time, enforcement of the standard became inconsistent, and beginning in 2011, the Minnesota Legislature passed several laws that delayed or weakened its implementation. These included directives for MPCA to conduct further research, revise the rule, and temporarily halt enforcement and spending requirements for sulfate control. In 2017, MPCA proposed a new rule using a formula that considered other water chemistry factors, but it was rejected in 2018 by an Administrative Law Judge for failing to adequately protect

wild rice and violating federal standards. That same year, legislative attempts to repeal the standard were vetoed by Governor Mark Dayton.

Sulfate Standard

Minnesota is currently the only state in the United States with a sulfate water quality standard specifically designed to protect wild rice. Other states with significant water resources and mining activity, including Michigan, Wisconsin, and California, do not enforce a similar regulation. Likewise, neighboring Canadian provinces such as Manitoba and Ontario have not adopted sulfate standards tailored to wild rice ecosystems. This makes Minnesota's approach unique and has prompted ongoing discussion about the scientific foundation and practical implications of the 10 mg/L sulfate limit.

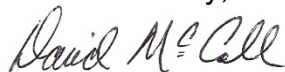
To provide perspective, the U.S. EPA recommends that sulfate levels in drinking water remain below 250 mg/L to avoid taste and potential health concerns. However, many bottled waters meet or exceed this guideline. For example, San Pellegrino mineral water contains approximately 445 mg/L of sulfate, nearly double the EPA's recommended limit. This comparison highlights the wide variation in sulfate concentrations across different water sources and underscores the importance of considering context when applying sulfate standards, particularly in environmental versus human consumption scenarios.

United Steelworkers proudly represent thousands of highly skilled men and women working across Minnesota's iron mining industry. These workers contribute significantly to the state's economy and national security, while also demonstrating a deep commitment to environmental stewardship in the communities where they live and work. We're deeply concerned about Minnesota's plan to enforce the 10 mg/L sulfate water quality standard. Requiring U.S. Steel's Keetac mine to meet full compliance by 2030 could have serious consequences — while the environmental benefits remain unclear, the risks to future mining investment and union jobs are very real. Sulfate impacts are complex, and Minnesota's approach is unlike any other.

We ask you to reject the MPCA's preliminary decision to deny this variance request, and to support the requested variance by U.S. Steel for sulfate levels in water used for the production of wild rice. This action is critical to protecting good union jobs and ensuring a fair, science-based approach to environmental regulation.

United Steelworkers appreciates the opportunity to share these comments.

Sincerely,



David McCall
International President