

From: [Brian Hubbard](#)
To: [Handeland, Stephanie \(MPCA\)](#)
Subject: NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac
Date: Wednesday, September 17, 2025 8:22:21 AM
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Good day, I'm Brian Hubbard, President of Lakehead Constructors in Superior. For more than a century, our union crews have helped build and maintain the industrial backbone of this region—mining and steel, power generation, and water/wastewater facilities.

Since 1991, we've performed mining maintenance and capital projects for Iron Range customers, and over the course of a year we employ about 1,400 people—families whose paychecks circulate through local shops, schools, and main streets. Our work sits inside a tightly linked regional economy: natural gas suppliers keep plants running; utilities like Minnesota Power as they power those facilities; and CN and BNSF move taconite pellets through the Twin Ports and to markets beyond the region.

I'm here in support of updating Minnesota's wild-rice sulfate policy to reflect modern, site-specific science. The current **10 mg/L limit—set in the 1970s—**was never meant as a one-size-fits-all rule for thousands of different waters, and today's research shows wild rice resilience depends on local chemistry. We can protect wild rice and the livelihoods that depend on responsible industry.

This isn't just a mining issue. Municipal wastewater plants, manufacturers, agriculture, other industrial facilities and small businesses will also be drawn in as enforcement expands—and when compliance is technically unattainable or prohibitively expensive, owners delay capital projects that deliver safety upgrades, efficiency, and lower emissions.

Two practical requests:

1. Adopt a science-based, site-specific framework—because no single number fits every water body.
2. Create a predictable permitting path—with clear timelines and streamlined variances as a bridge, especially for small municipalities.

Choose a workable, affordable standard and you'll unlock private capital for modernization across the Range and the broader region—hopefully supporting good union jobs and clean water. On behalf of the crews who build here, the customers who invest here, and the families who live here, I urge you to adopt an updated standard that reflects today's science and tomorrow's opportunities. This approach supports jobs and

preserves our natural resources.

Thank you.

Brian Hubbard | President

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