



Saint Louis County

Seventh District Commissioner • 1810 12th Avenue East, Hibbing, MN 55746
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Michael Jugovich
County Commissioner

September 22, 2025

Commissioner Katrina Kessler
Minnesota Pollution Control Agency
520 Lafayette Road N
St. Paul, MN 55155-4194
Delivered via email stephanie.handeland@state.mn.us

Re: Comment on NPDES permits MN0055948 and MN0031879 for U. S. Steel Keetac

To Whom It May Concern,

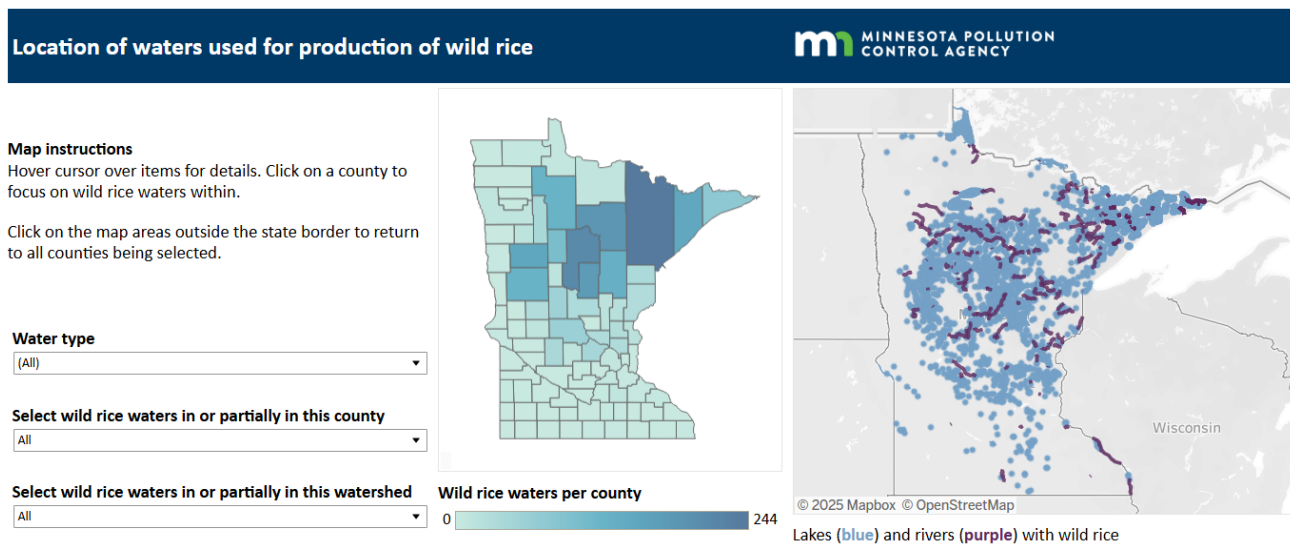
As St. Louis County Commissioner, I am writing to express my full support for U.S. Steel's Keetac Mine & Tailings Basin variance applications. I attended the public hearing in Virginia on September 3, 2025, along with an estimated 500 concerned Iron Rangers. Many in the hearing presented shortcomings in applied science, questions related to economic impact, concerns related to the timeline for compliance with many questions left unanswered. Below, I have reiterated these points for consideration.

The MPCA was directed to review and update the wild rice sulfate standard in 2011 but still has not done so. I strongly urge MPCA to work with the legislature 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. As noted by the MPCA, additional monitoring data would inform the reissuance process but was not provided as part of the permit. As a state agency, I ask the MPCA to work with the company to better understand the impact to wild rice in downstream waters and consider a reasonable timeline for compliance.

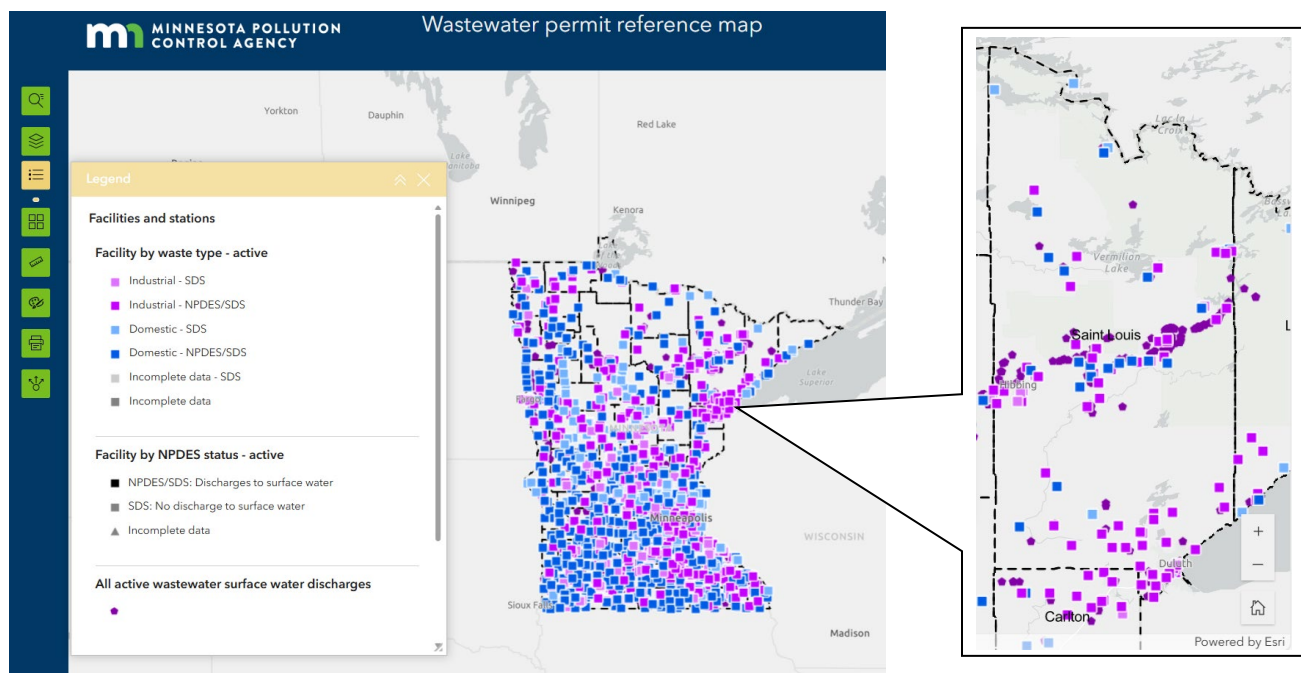
MPCA has offered a preliminary determination to deny the variance stating in part that U.S. Steel would not sustain substantial economic impacts from compliance with water quality standards. The preliminary determination states that substantial economic impacts on U.S. Steel cannot be established, and therefor "an analysis of widespread impacts on the surrounding community is not essential[.]" During the public meeting, MPCA indicated that U.S. Steel could afford the treatment technology. It is my understanding this evaluation was based on overall company performance. The reality is each mine site must compete internally to supply the iron units needed to make steel. Keetac is not only competing with Minntac but also with international pellet markets feeding the many steel mills in the U.S. Steel portfolio. Evaluating economic impact in Minnesota must consider that consolidation of Iron Range mines would have a profound impact on the region. Pellet

production from each individual mine impacts the local community, schools and county causing significant shifts in production tax distribution among other impacts.

During the hearing, a question was asked related to the MPCA's work to estimate the state-wide impact of enforcing the sulfate standard. This question was not answered. The MPCA has identified almost 2,400 waterbodies where the sulfate standard applies, with St. Louis County home to highest number of wild rice waters. St. Louis County is also home to most of the mining activity in the state, as well as many industrial and municipal permit holders. It is imperative that the MPCA review the regional impact associated with compliance. Inconsistency in mandating compliance between industry (including but not limited to mining) and municipal wastewater is both unfair and indicates we cannot realistically and feasibly meet these standards across the state.



[Workbook: Protecting wild rice waters](#)



[MPCA wastewater permit reference map](#)

Given that there are 600 people on the Iron Range currently out of work due to the idling of Minorca and Hibtac, *all* impacts on Permittees should mandate an analysis of widespread impacts on surrounding communities. Steelmakers operate globally and weigh costs accordingly. Investing hundreds of millions of dollars to meet questionable standards would push any industry to find places other than Minnesota to operate.

Minnesota's Mining Industry – an economic backbone of our state – is on a knife's edge, and mandating remediation investments that are based on antiquated and incomplete science is indefensible. I implore the MPCA to grant the requested variances and then work to update standards and permitting processes that wholistically ensure the protection of wild rice.

Sincerely,

A handwritten signature in blue ink that reads "Michael A. Jugovich". The signature is fluid and cursive, with the first name "Michael" being the most prominent part.

Michael A. Jugovich
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