



September 19, 2025
Via electronic submission

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

RE: Public Comment on U.S. Steel Keetac Wastewater NPDES permits MN0055948 and MN0031879

Dear Ms. Handeland:

On behalf of the Laurentian Chamber of Commerce, I am writing to express our strong support for U.S. Steel's request for a ***site-specific variance from the sulfate water quality standard at the Keetac facility in Keewatin***. Our chamber represents hundreds of businesses with thousands of employees across the Iron Range. The health of our regional economy is closely tied to the strength of our mining industry, and the Chamber is concerned that the ***denial of this variance would create widespread economic and social harm for our communities***.

Minnesota's sulfate standard of 10 milligrams per liter is not supported by current (or updated) science. Governor Mark Dayton's Task Force on Wild Rice acknowledged this uncertainty and the variability of sulfate impacts depending on site conditions. Yet under the draft permit, Keetac would be required to meet this number through end-of-pipe treatment technologies such as reverse osmosis. This approach is neither technically nor financially feasible. The capital and operating costs would run into the hundreds of millions of dollars. ***Broad enforcement of the sulfate standard will add significant costs to mining Minnesota's vast iron resource, making it uncompetitive with iron that is available in the global market.*** The MPCA's economic analysis of enforcing this standard does not account for the availability of lower-cost iron and steel from other countries. Minnesota's Mining Tax Guide shows global production of iron ore in 2023 was 2.5 billion metric long tons. A ***mere 35 million tons*** of iron ore pellets were produced in Minnesota that same year. The global iron and steel market is closing in on domestic production and ***we are asking the state not to help the process along with a standard that is not scientifically supported.***

If Keetac were to shut down due to enforcement of this standard, the consequences would be immediate and severe. ***More than 400 direct jobs at the mine would be lost, along with thousands of additional jobs supported across the regional supply chain.*** A 2020 economic impact study by the University of Minnesota Duluth found that mining jobs have a multiplier effect of 2.25, meaning every position in mining supports more than one additional job in transportation, retail, housing, and other sectors. The loss of Keetac would ripple through our economy and devastate communities that are already facing population decline and service shortfalls.

The public revenue at stake is equally significant. In 2023, the mining industry contributed nearly \$115 million in production taxes. Keetac paid \$17 million in production tax that year. These funds are not abstract; they pay for schools, city and township budgets, county roads, and economic development across the Iron Range. If Keetac is idled, the schools and local governments that depend on this revenue will be left scrambling to provide essential services with fewer resources. There is no back-up plan for the Range. The mines are our largest employers.

Our chamber believes strongly in responsible mining and environmental regulation that is rooted in science, transparency, and fairness. ***The variance process exists for circumstances exactly like this, where strict compliance is neither technologically nor economically feasible and would cause widespread harm.*** U.S.

Steel has followed the proper process, provided the necessary documentation, and demonstrated the risks. ***To deny this variance is to ignore both the scientific uncertainty and the devastating economic consequences.***

For these reasons, we respectfully urge the Minnesota Pollution Control Agency to reconsider its preliminary denial and grant the variance request for U.S. Steel's Keetac facility. ***This decision is critical to sustaining jobs, maintaining tax revenues, and protecting the long-term vitality of the Iron Range while ensuring environmental protections are guided by sound science.***

Respectfully,

A handwritten signature in blue ink that reads "Teresa Appelwick". The signature is written in a cursive, flowing style.

Teresa Appelwick
President/CEO
Laurentian Chamber of Commerce