Matthew Walto

Please see the attached letter.

Submitted via MPCA's Online Comment Form

September 2, 2025

Minnesota Pollution Control Agency
Stephanie Handeland – Industrial Division
Ian Babson – Environmental Analysis and Outcomes Division

Re: Variance Denials for U.S. Steel Keetac – Minnesota's 10 mg/L Sulfate Standard

Dear Ms. Handeland,
Dear Mr. Babson,

I am writing on behalf of myself and my family regarding the public notice of draft NPDES permits MN0031879 and MN0055948 for the United States Steel Keetac mining area and tailings basin. While I have previously submitted technical comments on the scientific foundation of the 10 mg/L sulfate standard, these remarks focus on the economic and family impacts of MPCA's proposed denial of variances.

1. Global Market Pressures

Iron ore pellets produced at Keetac are used domestically and internationally. While a portion of these pellets feed U.S. Steel's own blast furnaces, excess capacity must be marketed abroad. Domestic producers therefore compete directly with suppliers from Brazil, Oman, Sweden, Norway, Canada, Ukraine, and others.

In this environment, costs matter. The estimated $17.50 to $20.00 per ton increase associated with meeting the 10 mg/L sulfate limit could determine whether Minnesota pellets can compete globally—or whether that market share is lost permanently. With an existing domestic pellet oversupply, eliminating export competitiveness removes one of the few outlets available to handle excess production.

2. Family and Workforce Consequences

When market access narrows and operating costs soar, companies reduce output. For Iron Range families, this means:

- Job losses or shortened work weeks, leading to lost wages and benefits.
- Parents forced to choose between paying bills and enrolling children in youth sports.
- Vacations, dining out, and other family activities cut back—weakening small businesses across the region.
- Young adults losing access to seasonal jobs that help them buy a car, save for school, and build pride in their community.

I worry personally that if Keetac is forced to meet the 10 mg/L standard, U.S. Steel will shutdown or significantly cut back Keetac's operations, and I will be required to lay off part of my workforce. That does not just affect the individuals losing their jobs—it affects every corner of our community. The company I work for provides a generous donations match when its employees give to certain charities, and with fewer employees, those contributions will decline. We also will not have the headcount to review land access requests, market timber to local loggers, sell aggregate materials, or support other industries that depend on us. Many segments of our community will feel the loss.

3. Personal Experience

I know firsthand what it feels like when opportunity disappears. Years ago, I worked in oil exploration as a wellsite geologist in Williston, North Dakota. When the oil market collapsed, I lost my job and had to move back home with my parents. There was no money, no security, and no path forward. It was a difficult experience, one I would never want others to endure. Yet, that is exactly what many Iron Range families will face if Keetac is forced into uncompetitive conditions.

4. Broader Community Ripple Effects

The economic strain extends well beyond miners, land professionals, and lab technicians:

- Loggers, contractors, and suppliers lose work when mining operations scale back.
- Local charities and non-profits, including the United Way of Northeastern Minnesota, receive fewer donations and volunteers.
- Outdoor recreation groups lose access to trail partnerships when landowners cut back on staff and resources.
- Professional Services Companies employing architects, engineers, doctors, nurses, lawyers, etc., lose clients when benefits are cut and services are no longer deemed 'affordable'.

5. Precedent and What Comes Next

The decision to deny Keetac's variance will not end with Keetac. Once enforced here, the same standard will inevitably be applied elsewhere:

- Minntac – as the largest taconite operation in North America, the costs of compliance could dwarf even those faced by Keetac.
- Cleveland Cliffs – facilities already operating on thin margins, where added costs could put continued operation at risk.
- Local municipalities – wastewater treatment systems in towns across northern Minnesota will face new upgrade requirements, with costs pushed directly onto local taxpayers.
- Paper mills and other industrial dischargers – facilities with permitted discharges to wild rice waters will be swept into the same requirements, jeopardizing already challenged industries.
- Agricultural operations – farmers and processors with water discharges may find themselves facing compliance costs never envisioned when these rules were written.

This is not just about one mine. It is about setting a precedent that ripples through the entire Iron Range economy, local governments, and multiple sectors across Minnesota. This should be a state-wide concern.

Conclusion

Variance denials under the current sulfate standard do not exist in a vacuum. They reverberate through homes, schools, businesses, charities, and entire communities. Without a path to compliance that recognizes global market realities, Minnesota risks losing not just mining capacity, but the families, jobs, and traditions that define the Iron Range.

For these reasons, on behalf of myself and my family, I respectfully urge the MPCA to reconsider the proposed denials and to work with stakeholders to develop site-specific, science-based solutions that safeguard both wild rice and the communities that depend on mining.

Respectfully submitted,

Matthew Walto
On behalf of me and my family
Hibbing, Minnesota