U. S. Steel

Iron Ore Alliance

An alliance between the United Steelworkers and U. S. Steel

UNITED STEELWORKERS USW

September 22, 2025

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

Dear Ms. Handeland,

On behalf of the Iron Ore Alliance, a partnership between the United Steelworkers and U. S. Steel, we write to you regarding draft NPDES permits MN0055948 and MN0031879 for U.S. Steel's Keetac tailings basin and mining area, respectively. For more than a decade, the Iron Ore Alliance has worked collaboratively to advocate for Minnesota iron mining. Mining is not only a vital industry and economic driver for families and communities on the Iron Range, it is critical to our state.

We share the MPCA's commitment to protecting Minnesota's treasured natural resources, including our state's wild rice waters. However, we are deeply concerned that the draft permits include a sulfate standard of 10 mg/L. Enforcing such an outdated standard would impose unworkable costs without measurable benefits to wild rice.

Under the proposed permits, the cost to treat Keetac's tailings basin for sulfate would reach $800 million, an amount the MPCA determined Keetac could financially afford. Yet, this conclusion was informed by U. S. Steel's national profile rather than Keetac's specific financial reality. At the site-specific level, this expense is *not* feasible and would increase Keetac's cost per ton by $17.50, making Minnesota DR-grade pellets the least competitive product in the global market.

The result of this costly compliance would be layoffs or even the closure of Keetac, leading to widespread economic hardship. Mining supports more than 4,000 direct jobs and contributes over $1.8 billion annually to Minnesota's economy. These are high-quality, family-sustaining jobs that pay more than the regional average. If the sulfate standard were enforced as written, communities across the Iron Range would face devastation, all because of an outdated standard.

Minnesota's 10mg/L sulfate standard reflects what we knew in the 1970s, not in 2025. The MPCA itself has acknowledged that sulfate levels are not the sole determinant of wild rice health. A growing body of research reveals that many factors including iron and carbon levels, hydrology, climate conditions and more play a role in wild rice health. In fact, wild rice has proven to thrive in waters with sulfate levels above 10 mg/L, including Hay Lake downstream from Keetac, which has supported healthy wild rice for decades.

We want to be clear; we stand behind modern science to protect the environment and the waters we all enjoy. U. S. Steel has invested hundreds of millions of dollars in environmental improvements since 1960 and remains committed to finding workable sulfate solutions. U. S. Steel has partnered with researchers and technology developers, including Clearwater BioLogic and the Natural Resources Research Institute (NRRI), to explore promising sulfate technologies. More time and research are needed before such technologies can be deployed at a commercial scale. Until a

modern science-based and site-specific sulfate standard can be developed that addresses cost and the benefits of the cost, we respectfully urge the MPCA:

- To refrain from including sulfate limits in Keetac's permits. If the permit limits remain as proposed, the MPCA must modify the permits to contain a single sulfate compliance point and allow more time for compliance.
- To abide by the 2011 law and update the 10 mg/L sulfate standard that the state of Minnesota has recognized as being incorrect.

As the collective voice of more than 1,900 people who work for Minnesota Ore Operations, thank you for your consideration.

Sincerely,

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