

FLETCHER & SIPPEL LLC

ATTORNEYS AT LAW

29 North Wacker Drive
Suite 800
Chicago, Illinois 60606-3208

BRADON J. SMITH

(312) 252-1516
bsmith@fletcher-sippel.com

310480

ENTERED

Office of Chief Counsel

December 9, 2025

Part of
Public Record

Phone: (312) 252-1500

Fax: (312) 252-2400

www.fletcher-sippel.com

December 9, 2025

VIA ELECTRONIC FILING

Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
Washington, DC 20423-0001

Re: NOR 42184 *Dura-Bond Pipe, L.L.C. v. Cleveland-Cliffs Railways Inc.*

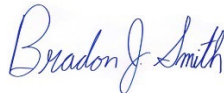
EP 346 (Sub-No. 29) *Rail General Exemption Authority — Petition of AAR to Exempt Rail Transportation of Specific Commodity Groups.*

Dear Chief of Case Administration:

Enclosed are **Dura-Bond Pipe, L.L.C.'s Complaint and Petition for Preliminary Injunction (Expedited Relief Requested) in NOR 42184; and Petition for Partial Revocation in EP 346 (Sub-No. 29)** for filing.

Filing fees in the dockets have been tendered via Pay.gov. Should any questions arise regarding this filing, please feel free to contact me. Thank you for your assistance.

Yours,



Bradon J. Smith

Attorney for Dura-Bond Pipe, L.L.C.

BJS

FEE RECEIVED

December 9, 2025

SURFACE

TRANSPORTATION BOARD

FILED

December 9, 2025

SURFACE

TRANSPORTATION BOARD

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

NOR 42184

DURA-BOND PIPE, L.L.C.
v.
CLEVELAND-CLIFFS RAILWAYS INC.

DURA-BOND PIPE, L.L.C.'S VERIFIED COMPLAINT

Bradon J. Smith
Valerie O. Quinn
Thomas J. Litwiler
Fletcher & Sippel LLC
29 North Wacker Drive
Suite 800
Chicago, Illinois 60606-3208
(312) 252-1500

**Attorneys for Dura-Bond Pipe,
L.L.C.**

Dated: December 9, 2025

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

NOR 42184

DURA-BOND PIPE, L.L.C.
v.
CLEVELAND-CLIFFS RAILWAYS INC.

DURA-BOND PIPE, L.L.C.’S VERIFIED COMPLAINT

Without authorization from the Surface Transportation Board, Cleveland-Cliffs Railways Inc. (“Railways”) has announced it will summarily discontinue all rail service on its lines in Steelton, Pennsylvania on January 13, 2026. With this Dura-Bond Pipe, L.L.C. (“Dura-Bond”) complains as follows:

1. Dura-Bond and its related companies (collectively referred to by its parent, “Dura-Bond Industries”) is owned and operated by the Norris family (father Wayne and siblings Jason, Ryan, Adam, and Sara). Dura-Bond Industries employs over 400 skilled workers across Pennsylvania, with nearly half of those employees working at its Steelton facility.

2. Steelton is an industrial hamlet south of Harrisburg on the Susquehanna River. As the name suggests, it is the site of a historic Bethlehem Steel mill now owned by a corporate entity within the Cleveland-Cliffs group of companies (together with its corporate affiliates, including Railways, “Cliffs”).

3. Dura-Bond makes large-diameter pipe with sizes ranging between 24 and 42 inches. Dura-Bond’s Steelton pipe facility (“Pipe Facility”) is one of only four

locations in the country where these pipes are made and the only one that is American owned.

4. The Pipe Facility supplies 20% of the large-diameter pipe market. Large-diameter pipe is a critical link in America's energy supply chains and the use of energy, including the development and transportation of natural gas and operation of liquified natural gas facilities.

5. Natural gas and other pipe-dependent facilities are required to support a rapidly expanding energy market. Current market pressures include the international race for Artificial Intelligence among the United States and other global actors. AI needs data centers, which needs power, which needs fuel, which needs pipeline to travel. Power demand is expected to double by 2030, and cannot be well-met without Dura-Bond's domestic pipe supply and ownership.

6. There are even more acute concerns geopolitically. U.S. natural gas is critical for nations that would otherwise require it from Russia. Pipeline is required to transfer the gas to terminals where it can be liquefied and exported to Europe.

7. Dura-Bond generates approximately up to \$250,000,000 in sales revenue yearly on a single shift operation, and a significant portion of that is continually reinvested in its facilities to meet the growing capacity demands for large-diameter piping. For example, Dura-Bond invested \$2,687,000 in 2025 in a new weld inspection system at Steelton that will enable it to meet any customer specification.

8. Dura-Bond currently has orders through 2028 and is negotiating to supply up to 320,000 tons of pipe through 2030. That equates to about 3 million feet

of pipe for 570 miles of pipeline that rely on Dura-Bond. With these new orders, Dura-Bond plans to grow its Steelton operations and add over 200 new skilled jobs—including a second shift. Dura-Bond’s customers depend on it as a necessary supplier to support American energy independence, and Dura-Bond stands ready to respond.

9. To produce the pipe, the Pipe Facility receives steel plates from Cliffs’s steel mill located in Burns Harbor, Indiana. This year, Dura-Bond ordered more than 100,000 tons of steel plates from Cliffs to support its current production commitments in Steelton. Currently, Cliffs supplies 85% of Dura-Bond’s demand for steel plates.

10. Dura-Bond buys the steel plates from Cliffs on a “delivered” pricing basis, meaning the cost of rail delivery of the plates to Steelton is included in the price that Dura-Bond pays Cliffs for the steel plates.

11. The Pipe Facility produces pipe in 80-foot lengths and will produce more than 1.2 million feet this year—all of which will be shipped to pipeline companies via rail at Dura-Bond’s cost. Rail is paramount for pipe delivery as it is not practicable to move significant amounts of 80-foot large diameter steel pipe via motor carriers.

12. Dura-Bond was founded by JM “Buster” Norris. In the 1950s, Buster started coating pipe fittings and small runs of pipe by hand in his backyard. By 1960, after some success, Buster formed Dura-Bond Protective Coating. In 1968, Buster’s son, Wayne, quit his teaching job and began working full-time marketing Dura-Bond’s products, quoting jobs, and working in the field.

13. In 1993, Dura-Bond took over a protective coating facility in Steelton. Another company had been operating that facility on the premises of Bethlehem Steel's large-diameter pipe facility, but closed as it became fearful that Bethlehem Steel would soon go out of business. Undeterred, the Norris family "bet" the entire Dura-Bond company and significant personal assets to purchase the coating facility.

14. In 2001, Bethlehem Steel went bankrupt. Dura-Bond "bet the company" again and, by 2007, purchased the old Bethlehem Steel Pipe Facility. The equipment and buildings were in very poor condition; Dura-Bond invested tens of millions of dollars and human capital to retool the facility into a Tier 1 supplier of high-pressure, large-diameter pipe.

15. The steel plate input and pipe output production at Steelton exclusively rely on rail service for transportation; the combined use this year will be 3,000 carloads. Norfolk Southern Railway Company ("Norfolk Southern") is the linehaul carrier, picking up rail cars from the interchange as tendered or received from the local rail carrier then-serving Steelton.

16. Common carrier rail operations at Steelton were previously provided by the Steelton & Highspire Railroad Company LLC ("S&H Company"), a Bethlehem Steel subsidiary. In 2003, ISG Railways, Inc. ("ISG Railways") acquired the rail lines and other assets of S&H Company and seven other Bethlehem Steel Class III rail carrier subsidiaries. *See Verified Notice of Exemption in ISG Rys.—Acquis. & Control Exemption—Assets of Keystone R.R., et al.*, FD 34344 (filed Apr. 22, 2003). At the same time, an affiliate of ISG Railways acquired Bethlehem Steel's Steelton steel mill (located adjacent to the Pipe Facility).

17. The S&H Company (Bethlehem Steel carrier) incorporation authority has been withdrawn. *See* Exhibit A.

18. On or about July 19, 2006, ISG Railways changed its name to Mittal Steel USA – Railways Inc. (“Mittal Railways”). *See* Exhibit B.

19. On or about January 22, 2021, Mittal Railways changed its name to Cleveland-Cliffs Railways Inc. *See* Exhibit C.

20. Cliffs took possession of the legacy steel mill and rail assets in 2020.

21. Railways characterized its interest at the Steelton facility as one in which it obtained “control” of the S&H Company. *See, e.g.,* Verified Notice of Exemption in *Cleveland Cliffs-Inc. — Acquis. of Control Exemption — Brandywine Valley R.R., Steelton & Highspire Railroad Company et al.*, FD 36449 (filed Oct. 23, 2020).

22. From 2020 onward, Railways has held itself out as a common carrier offering rail service at Steelton under the name Steelton & Highspire. It delivers inbound cars from, and receives outbound cars Dura-Bond tenders for, transportation on Norfolk Southern.

23. On information and belief, Norfolk Southern absorbs Railways’s switching charges in the transportation rates it charges Cliffs for the delivery of steel plates to Dura-Bond at Steelton.

24. On May 2, 2025, Cliffs announced that it would “idle” the Steelton steel mill. *See* Exhibit D. Later that month, Cliffs told Jason Norris of Dura-Bond

that this idling would end Railways's rail service at Steelton unless Dura-Bond paid Cliffs its full costs of operation at the Steelton mill (including electrical supply and rail service).

25. From this date onward, the threat of cessation has continued with no apparent regard to Railways's common carrier service obligations and the authority of the Surface Transportation Board.

26. If Railways were to receive authority from the Surface Transportation Board for its planned cessation of service, it would have to provide up to 6 years of labor protection payments to its workers. *Oregon Short Line Railroad — Abandonment — in Bingham and Bonneville Counties, Idaho*, 360 I.C.C. 91, 98 (1979).

27. Since Cliffs's May announcement Dura-Bond has made attempts to purchase various rail assets at Steelton (real property interests, track assets, and operating rights) sufficient to preserve rail service for itself and another customer, Atlantic Track—a rail track manufacturer and servicer. Cliffs showed no interest in such discussions until Jason Norris reminded Cliffs's management that Dura-Bond was a significant customer of Cliffs. Subsequent negotiations are memorialized in draft exchanges of unsigned "Transition Services" or similar documents exchanged between Cliffs and Dura-Bond throughout the summer.

28. As a condition of continued rail service from July 2025 onward, Cliffs and Railways have demanded that Dura-Bond reimburse Railways for what Cliffs and Railways claim are Railways's costs of operation. Cliffs sends monthly "provisional" invoices for these asserted amounts, that it later revises upward. *See* Exhibit E, 4 (revising July 2025 invoice in September 2025).

29. Paul Finan, an executive within Cliffs, told Jason Norris that Cliffs “would continue providing rail service as long as you [Dura-Bond] pay us” the amounts invoiced per ¶28.

30. The provisional invoices from July onward are \$339,500 each, payment of which Cliffs requires for rail service to continue in that month. Then, at the end of the month (sometimes later), Cliffs revises the invoices to account for what its claims are actual costs—just as it issues a new provisional invoice for the following month. *See* Exhibit F, 2.

31. The amounts attributable to rail service are lumped in with other services—including utility service costs that do not always exist. *See* Exhibit G, 1 (“There is still no actual water charge for October- so we stayed with the provisional amount.”). Cliffs has never provided Dura-Bond its formula for calculating the provisional or final invoices or provided a breakdown of the individual cost items.

32. The later revised invoice always results in an upward adjustment of amounts due to Cliffs, often with no less than a 50% increase. *See, e.g.,* Exhibit E, 2 (noting increase in labor charges over the provisional amount).

33. Dura-Bond has told Cliffs it was making any reimbursement payments for rail service “under protest.” *See* Exhibit E, 2. It has made provisional and final payments for rail service for July through October 2025, and a provisional payment for November.

34. Railways has continued to provide rail transportation to and from Dura-Bond under threat that Railways would cease rail transportation should Dura-Bond fail to make these payments.

35. The payments to Railways for rail service since July 2025 represent a duplicative, second carriage arrangement. Railways is selling the same rail service twice: first to Cliffs (via the Norfolk Southern absorbed switch charge) and second to Dura-Bond by conditioning rail service on the payments described above.

36. There is no contract between Dura-Bond and Railways for this second carriage arrangement.

37. Since September 25, 2025, Dura-Bond has asked to meet with Cliffs to discuss the invoices.

38. Cliffs has declined to meet and instead asserted the duplicative arrangement was an attempt to “help” Dura-Bond in a “fair way.” *See Exhibit E, 1.*

39. Meanwhile, on October 30, 2025, Cliffs announced that it would permanently close the mill no later than January 13, 2026. One week later on November 6, 2025, Railways informed Dura-Bond it would cease all rail service at Steelton on January 13, 2026. *See Exhibit H.*

40. On receiving this information, Dura-Bond renewed its interest in lawfully taking over the Steelton rail operations and made a purchase offer of \$2 million.

41. Until December 8, 2025, Cliffs declined to discuss the future of rail operations with Dura-Bond any further. And even on that day Railways had no further information that it could provide. *See Exhibit I.*

42. Dura-Bond is currently committed and negotiating orders through 2030 with a potential value of \$650 million that would require more than 200 new skilled jobs.

43. Without rail service, Dura-Bond cannot receive steel plates—including from Cliffs’s competitors—and deliver pipe to customers. Simply put, without rail service, Dura-Bond cannot meet America’s energy needs.

Count I Unauthorized Cessation of Service

44. Dura-Bond incorporates ¶¶1–43.

45. Railways is a rail carrier under the Interstate Commerce Act as amended and codified at 49 U.S.C. Subtitle IV.

46. Railways provides service to Dura-Bond at Steelton as a regulated common carrier on one or more lines of railroad.

47. As a rail common carrier Railways is required to provide service upon reasonable request. 49 U.S.C. § 11101(a).

48. The Interstate Commerce Act requires the Board to authorize a rail carrier’s cessation of service on a line of railroad. 49 U.S.C. § 10903(a)(1).

49. Railways must obtain authority from the Board under the Interstate Commerce Act to cease operations at Steelton. *Id.*

50. Ceasing rail service without authorization from the Board is unlawful under the Interstate Commerce Act.

51. Without rail service Dura-Bond would be required to halt production at Steelton and could not supply its customers or take future orders.

52. Such cessation of service would result in damages to Dura-Bond and otherwise harm Dura-Bond such that money damages would be an insufficient remedy.

53. This cessation of service is not in the public interest and would be a national security risk, impairing the sole available domestic-based supplier of large-diameter pipe at a critical moment for the future of energy and technology.

Count II

Unreasonable Practice — Double Recovery

54. Dura-Bond incorporates ¶¶1–43.

55. The Interstate Commerce Act prohibits rail carriers from imposing conditions on rail service to the extent the conditions constitute an unreasonable practice. 49 U.S.C. § 10702(2).

56. Railways's requiring Dura-Bond to pay for rail service—that Cliffs has already paid for and charged Dura-Bond for in the delivery price—is an unreasonable practice in that Railways receives a double recovery by extracting two payments for carriage for a single transportation obligation.

57. Railways has effected this condition since July 2025.

Prayer

Wherefore, for all these reasons the Surface Transportation Board should:

1. Declare that Railways cannot cease rail service to Dura-Bond without appropriate authority from the Board;
2. Order Railways to continue rail service to Dura-Bond until Railways seeks, obtains, and consummates such authority;
3. Declare Railways's additional invoicing and collection efforts to be an unreasonable practice;
4. Order such invoicing and collection efforts to cease;
5. Award all available damages to Dura-Bond, including, but not limited to, all monies paid in response to the additional invoicing since July 2025; and
6. Provide for any other relief the Board finds just.

Dated: December 9, 2025



Bradon J. Smith
Valerie O. Quinn
Thomas J. Litwiler
Fletcher & Sippel LLC
29 North Wacker Drive
Suite 800
Chicago, Illinois 60606-3208
(312) 252-1500

**Attorneys for Dura-Bond Pipe,
L.L.C.**

PA

An Official **Pennsylvania** Government Website

pennsylvania
DEPARTMENT OF STATE

Business

UCC

Trademark

CROP

Home

Search

Initial Forms

My Work Queue

My Records

Data Requests

Dashboard

Help

Business Search

As of 12/08/2025 we have processed all business filings received in our office through 12/04/2025.

Business Search Info:

Steelton & Highspire

Advanced

Results: 8

Filing Information	Initial Filing Date	Status	Entity Type	Formed In	Address
STEELTON AND HIGHSPIRE RAILROAD COMPANY (342701)	11/14/1916	Inactive - Withdrawn - Consolidated Inactive	Domestic Business Corporation	PENNSYLVANIA	
STEELTON AND HIGHSPIRE RAILROAD COMPANY LLC (3042151)	12/20/2001	Inactive - Withdrawn - Consolidated Inactive	Domestic Limited Liability Company	PENNSYLVANIA	CT Corporation System
Steelton Highspire United LLC (13542462)	08/02/2023	Active	Domestic Limited Liability Company	PENNSYLVANIA	253 S FRONT STREET, STEELTON, PA 17113
STEELTON-HIGHSPIRE HIGH SCHOOL ALUMNI ASSOCIATION (2588224)	06/30/1994	Active	Domestic Nonprofit Corporation	PENNSYLVANIA	PO BOX 588 SWATARA, STEELTON, PA 17113-588
Steelton-Highspire Midget Football Association (6440610)	08/11/2016	Active	Domestic Nonprofit Corporation	PENNSYLVANIA	United States Corporation Agents, Inc.
Steelton Highspire United Youth Services (14015543)	11/21/2024	Active	Domestic Nonprofit Corporation	PENNSYLVANIA	253 S FRONT ST, STEELTON, PA 17113-2528
Steelton & Highspire Railroad (4170270)	03/01/2013	Active	Fictitious Name	PENNSYLVANIA	ONE SOUTH DEARBORN, SUITE 1900, CHICAGO, IL 60603
Steelton-Highspire SD Solar Partners LLC (6656679)	01/20/2018	Active	Fictitious Name	PENNSYLVANIA	4550 LENA DRIVE, MECHANICSBURG, PA 17055

STEELTON AND HIGHSPIRE RAILROAD COMPANY LLC (3042151)

Request Certificate

Initial Filing Date

12/20/2001

Status

Inactive - Withdrawn - Consolidated Inactive

Formed In

PENNSYLVANIA

Filing Type

Domestic Limited Liability Company

Filing Subtype

Limited Liability Company

Registered Office

CT Corporation System

County

Lehigh

View History

Manage Notifications

Request Access

ACCESSIBILITY | PRIVACY & DISCLAIMERS | TRANSLATION DISCLAIMER |

Copyright © 2025 Commonwealth of Pennsylvania. All rights reserved.

Entity #: 3139862
Date Filed: 07/19/2006
Pedro A. Cortés
Secretary of the Commonwealth

PENNSYLVANIA DEPARTMENT OF STATE
CORPORATION BUREAU

Application for Amended Certificate of Authority

Foreign Corporation

(15 Pa.C.S.)

☒ Foreign Business Corporation (§ 4126)

☐ Foreign Nonprofit Corporation (§ 6126)

Name			
Address			
City			
State			
Zip Code			

Document will be returned to the name and address you enter to the left.

Fee: \$250

In compliance with the requirements of the applicable provisions of 15 Pa.C.S. (relating to corporations and unincorporated associations), the undersigned foreign corporation, desiring to receive an amended certificate of authority, hereby states that:

1. The name under which the corporation currently holds a certificate of authority to do business within the Commonwealth of Pennsylvania is:

ISG RAILWAYS INC.

2. The name of the jurisdiction under the laws of which the corporation is incorporated is:

Delaware

3. The address of its principal office under the laws of the jurisdiction in which it is incorporated is:

1209 Orange Street	Wilmington	Delaware	19801
Number and Street	City	State	Zip

4. The (a) address of this corporation's registered office in this Commonwealth or (b) name of its commercial registered office provider and the county of venue is:

(a) Number and Street	City	State	Zip	County
-----------------------	------	-------	-----	--------

(b) Name of Commercial Registered Office Provider
cio: CT Corporation System

County
Philadelphia

Check if applicable:

☐ The foregoing reflects a change in Pennsylvania registered office.

Commonwealth of Pennsylvania
AMENDED CERT. OF AUTHORITY--BUSINESS Foreign 3 Page(s)

PA031 - HW12/2005 C T System Online



T0620160128

PA. DEPT. OF STATE

2006 JUL 19 PM 3:55

DSCB:15-4126/6126-2

5. The corporation desires that its certificate of authority be amended to change the name under which it is authorized to transact business in the Commonwealth of Pennsylvania to:

Mittal Steel USA - Railways Inc.

6. If the name set forth in Paragraph 5 is not available for use in this Commonwealth, complete the following:

The fictitious name which the corporation adopts for use in transacting business in this Commonwealth is:

The corporation shall do business in Pennsylvania only under such fictitious name pursuant to the attached resolution of the board of directors under the applicable provisions of 15 Pa.C.S. (relating to corporations and unincorporated associations) and the attached form DSCB:54-311 (Application for Registration of Fictitious Name).

7. Check one of the following:

☒ The change of name reflects a change effected in the jurisdiction of incorporation

☐ Documents complying with the applicable provisions of 15 Pa.C.S. § 4123(b) or 6123(b) (relating to exception; name) accompany this application.

IN TESTIMONY WHEREOF, the undersigned corporation has caused this Application for an Amended Certificate of Authority to be signed by a duly authorized officer thereof this

18th day of July
2006

MITTAL STEEL USA - RAILWAYS INC.

Name of Corporation

Maria J. Lele

Signature

Assistant Secretary

Title

Entity# : 3139862
Date Filed : 01/22/2021
Pennsylvania Department of State

PENNSYLVANIA DEPARTMENT OF STATE
BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS

☐ Return document by mail to: CT - COUN Name <u>13456819 579</u> Address <u>Wolterskluwer.com</u> City _____ State _____ Zip Code _____ ☒ Return document by email to: _____	Amendment of Foreign Registration DSCB:15-413 (rev. 2/2017)  TCO210122JD1398
---	--

Read all instructions prior to completing. This form may be submitted online at <https://www.corporations.pa.gov/>.

Fee: \$250

In compliance with the requirements of the applicable provisions of 15 Pa.C.S. § 413 (relating to amendment of foreign registration statement), the undersigned registered foreign association hereby states that:

1. The name of the association under which it is registered to do business in this Commonwealth is:

Mittal Steel USA – Railways Inc.

2. The type of association is (check only one):

- | | | |
|--|--|---|
| ☒ Business Corporation | ☐ Limited Partnership | ☐ Business Trust |
| ☐ Nonprofit Corporation | ☐ Limited Liability (General) Partnership | ☐ Professional Association |
| ☐ Limited Liability Company | ☐ Limited Liability Limited Partnership | |

3. The (a) address of the association's registered office in this Commonwealth or (b) name of its Commercial Registered Office Provider and the county of venue is:

Complete part (a) **OR** (b) – not both:

(a) _____
Number and street City State Zip County
OR

(b) c/o: C T Corproation Dauphin
Name of Commercial Registered Office Provider County

4. Effective date of amendment of foreign registration (check, and if appropriate complete, one of the following):

- ☒ The Amendment of Foreign Registration shall be effective upon filing in the Department of State.
☐ The Amendment of Foreign Registration shall be effective on: _____ at _____.
Date (MM/DD/YYYY) Hour (if any)

DEPT OF STATE

JAN 22 2021

DSCB:15-413 - 2

5. Check, and if appropriate complete, one of the following:

☒ The association desires that its registration be amended to change or correct the following information:

The true name has changed to Cleveland-Cliffs Railways Inc.

☐ The amendment adopted by the association is set forth in full in Exhibit A attached hereto and made a part hereof.

If the amendment reflects a change in name for the association which does not comply with 15 Pa.C.S. § 414 and §§ 201-209, the foreign association must adopt an alternate name that complies with 15 Pa.C.S. §§ 201-209 for use in Pennsylvania.

IN TESTIMONY WHEREOF, the undersigned association has caused this Amendment of Foreign Registration Statement to be signed by a duly authorized representative thereof this 20 day of January 2021.

Mittal Steel USA – Railways Inc.

Name of Association

Heather Paarlberg

Signature

Heather Paarlberg Secretary

Title

ADVERTISEMENT / SPONSORED POST

Monday, December 8, 2025

in @ f X v d a

STEEL INDUSTRY NEWS

Search...

HOME SUBSCRIBE VIDEOS PODCAST EBOOKS MARKETS STEEL MILLS TECHNOLOGY SHOP ADVERTISING STEEL GUIDE

Home > Steel Mills

Cleveland Cliffs' Strategic Steel Plant Idlings: Market Dynamics and Industry Implications

Cleveland Cliffs, North America's largest flat-rolled steel producer, has recently announced significant operational changes that will reshape parts of the American steel landscape.

05/03/2025 in Steel Mills, Steel Production



Blast Furnace by Steel Industry News

Cleveland Cliffs, North America's largest flat-rolled steel producer, has recently announced significant operational changes that will reshape parts of the American steel landscape. On May 2, 2025, the steelmaking giant revealed plans to indefinitely idle three steel plants across Pennsylvania and Illinois, affecting approximately 950 workers¹. This decision comes on the heels of earlier announcements to idle facilities in Michigan and Minnesota, creating a pattern that raises important questions about the current state of the domestic steel industry. As a major player in the US steel market and a primary supplier to the automotive sector, Cleveland Cliffs' operational decisions serve as important indicators of broader market conditions, supply chain dynamics, and the effectiveness of trade policies designed to protect American steel producers.

Cleveland Cliffs' Recent Plant Idling Announcement

Cleveland Cliffs has announced plans to indefinitely idle three steel plants starting around June 30, 2025. The affected facilities include two Pennsylvania plants—one in Steeltown and another in Conshohocken—as well as a plant in Riverdale, Illinois¹. This operational adjustment will impact approximately 950 workers across these three locations and comes after the required 60-day notice period mandated by federal law¹. Each of these facilities specializes in products that Cleveland Cliffs has characterized as falling "outside of Cliffs' core business focus", including rail, specialty plate, and high-carbon sheet¹.

The Steeltown facility, located near Harrisburg, Pennsylvania, primarily manufactures rails for the transportation industry¹. The Conshohocken plant serves as a plate finishing facility near Philadelphia¹. Meanwhile, the Riverdale facility outside of Chicago operates as a compact strip mill that produces high-carbon steel sheets¹. What makes the Riverdale operation particularly notable is its unique supply chain arrangement—it sources hot metal from Cleveland Cliffs' steel mill in East Chicago, Indiana, transporting the material across the state border into Illinois via specialized torpedo cars¹.

While these three facilities face indefinite idling, Cleveland Cliffs has emphasized that its flat-rolled steel production levels will not be affected by these actions¹. This suggests a strategic reallocation of resources rather than an overall reduction in the company's total output capacity. The company has framed these moves as "temporary, indefinite idles" that are "a necessary response to insufficient demand and pricing for the products the affected facilities produce"¹.

The Rationale Behind Cleveland Cliffs' Decision

Cleveland Cliffs has explicitly stated that these plant idlings are driven by "insufficient demand and pricing" for the specific products manufactured at the affected facilities¹⁰. The company has been careful to point out that the decision is not related to President Trump's tariffs on steel imports¹. Instead, the focus appears to be on optimizing the company's product portfolio and production footprint.

One key insight into Cleveland Cliffs' strategy comes from their description of the affected products as falling "outside of Cliffs' core business focus"¹. This suggests a deliberate move toward concentrating operations on their primary product lines, particularly those serving the automotive industry, which has historically been a major customer for the company¹⁹. By idling facilities that produce rails, specialty plate, and high-carbon sheet, Cleveland Cliffs may be strategically repositioning itself to better align with market opportunities in its core business segments.

The timing and nature of these idlings raise questions about the age and efficiency of the affected facilities. While not explicitly stated in recent announcements, older steel plants typically face higher operational costs and maintenance challenges compared to newer, more technologically advanced facilities. The steel industry has been undergoing consolidation and modernization for decades, with companies often choosing to concentrate production in their most efficient operations. The affected plants may represent older or less efficient parts of Cleveland Cliffs' production network that became economically challenging to maintain during periods of reduced demand or pricing pressure.

Market conditions in the steel industry have been complex in recent years, with fluctuating demand across different sectors. The company's explicit mention of "insufficient demand and pricing" points to challenges in specific market segments rather than industry-wide issues¹. This targeted approach to capacity adjustment suggests Cleveland Cliffs is responding to specific market signals rather than implementing across-the-board cutbacks.

Previous Capacity Adjustments by Cleveland Cliffs

The May 2025 announcement follows a pattern of strategic capacity adjustments that Cleveland Cliffs has implemented in recent months. In March 2025, the company announced plans to idle steelmaking operations at its Dearborn Works in Michigan, affecting approximately 600 workers¹. Unlike the most recent idlings, which were attributed to product-specific market conditions, the Dearborn idling was explicitly linked to "weak automotive production in the United States"¹.

The Dearborn facility, which is situated near Detroit's automotive manufacturing hub, has been particularly vulnerable to fluctuations in automotive demand. The idling specifically targeted the blast furnace, basic oxygen furnace steel shop, and continuous casting facilities while keeping other operations running¹. This selective approach allowed the company to maintain employment for approximately 550 workers at the site's finishing facilities, including the pickling line tandem cold mill and the continuous galvanizing line¹⁶.

In addition to the steel plant adjustments, Cleveland Cliffs announced in March 2025 that it would idle or partially idle two iron ore mines in Minnesota—Minorca in Virginia and Hibbing in Minnesota—resulting in layoffs for approximately 630 workers¹. This decision was attributed to "an accumulation of pig iron pellets in excess of expected needs"¹⁶, indicating challenges in balancing raw material production with downstream steel manufacturing requirements.

While idling several facilities, Cleveland Cliffs has simultaneously planned to resume operations at its Cleveland Works No. 6 blast furnace, which was idled in September 2024 due to declining demand for automotive steel¹⁶. The company indicated that this restart would help offset the Dearborn idling, though analysts noted that the shift represented a net reduction of about 600,000 tons per year of production capacity¹⁶.

This pattern of selective idling and restarting suggests a dynamic approach to capacity management, with Cleveland Cliffs adjusting individual facilities based on specific market conditions, product demand, and operational efficiencies rather than implementing uniform cutbacks across its network.

Impact on US Steel Industry Capacity Utilization

The idling of multiple Cleveland Cliffs facilities raises important questions about overall capacity utilization in the US steel industry. Capacity utilization—the percentage of available production capacity that is actually being used—serves as a key indicator of industry health and efficiency. Steel manufacturers typically aim for utilization rates of 80% or higher to achieve optimal operational economics.

Cleveland Cliffs' recent idlings, while significant for the affected communities and workers, represent a strategic adjustment rather than a broad industry contraction. The company has emphasized that its flat-rolled steel production levels will not be affected by the most recent idlings¹⁰, suggesting a reallocation of production rather than an overall reduction in output. However, the earlier Dearborn idling, combined with the Cleveland Works restart, was expected to result in a net reduction of approximately 600,000 tons per year of production capacity¹⁶.

When steel producers idle capacity, the impact on overall industry utilization rates depends on several factors, including whether other producers increase their output to fill market gaps and whether demand shifts to alternative products or imports. Historically, capacity reductions have often led to improved utilization rates for remaining operations, potentially enhancing efficiency and profitability for producers that maintain full operations.

The selective nature of Cleveland Cliffs' capacity adjustments—focusing on specific products "outside of Cliffs' core business focus"¹—suggests a targeted approach that may have limited impact on broader industry utilization rates. Products like rail, specialty plate, and high-carbon sheet represent specialized market segments that may not significantly affect utilization in major product categories like automotive sheet or construction products.

Effects on Steel Market Dynamics

Capacity adjustments like those announced by Cleveland Cliffs typically have cascading effects throughout steel markets, potentially influencing lead times, pricing dynamics, and supply chain relationships. The idling of specialized production facilities can create particular market impacts for the specific products manufactured at those sites.

Lead times—the duration between order placement and delivery—often extend when production capacity is reduced. For products manufactured at the idled facilities, including rail, specialty plate, and high-carbon sheet, customers may experience longer wait times if demand remains steady while available supply decreases. This effect may be particularly pronounced for specialized products with limited alternative sources of supply, such as the rails produced at the Steeltown facility.

Pricing dynamics often respond directly to capacity adjustments. When capacity is reduced in a specific product category, prices typically increase if demand remains constant or grows. This relationship between supply and pricing appears to be at the heart of Cleveland Cliffs' decision, as the company cited "insufficient demand and pricing" as the primary driver for the idlings¹⁰. The implication is that current market prices do not justify continued production of these specialized products, at least at the affected facilities.

Supply chain considerations extend beyond immediate customers to affect downstream manufacturers and distributors. For instance, the rail products from the Steeltown facility support transportation infrastructure projects, while specialty plate and high-carbon sheet serve various industrial applications. Customers in these sectors may need to seek alternative suppliers, potentially leading to shifts in established supply chain relationships.

Historical examples of capacity adjustments in the steel industry have demonstrated these market effects. When steel producers have idled capacity in the past, remaining producers often gained pricing power and market share, particularly in specialized product categories with limited competition. However, these effects can be temporary, as market forces eventually establish new equilibrium conditions.

The Tariff Paradox: Why Idle Plants During Protective Measures?

One of the most intriguing aspects of Cleveland Cliffs' recent capacity adjustments is their timing relative to steel tariff policies. Steel tariffs have been implemented to protect domestic producers from foreign competition, theoretically enabling American steelmakers to maintain higher capacity utilization and profitability. The apparent contradiction between protective trade measures and capacity reductions raises important questions about market dynamics and policy effectiveness.

Cleveland Cliffs has explicitly stated that its recent idling decisions are not related to President Trump's tariffs¹⁰. Instead, the company has expressed optimism about the potential benefits of these policies, stating, "We believe that, once President Trump's policies take full effect and automotive production is re-shored, we should be able to resume steel production at Dearborn"¹. This statement suggests that Cleveland Cliffs views the current idlings as temporary adjustments while awaiting the full implementation and impact of trade policies.

The company's chairman, president, and CEO, Lourenco Goncalves, has been "a vocal supporter of the Trump administration's efforts to use tariffs in favor of U.S. steel production"¹⁴. Cleveland Cliffs' corporate position emphasizes the importance of tariffs in protecting "the U.S. economy, national security, and industrial base from the adverse effects of global steel overproduction"¹⁹. Their public statements highlight concerns about "foreign producers, often backed by government subsidies," flooding "international markets with artificially cheap steel, undercutting American manufacturers and threatening domestic jobs"¹⁹.

Despite this supportive stance on tariffs, Cleveland Cliffs is adjusting capacity in response to specific market conditions rather than waiting for tariff benefits to materialize fully. This approach suggests a pragmatic business strategy that balances long-term policy expectations with short-term market realities. While the company may anticipate future benefits from tariffs, particularly in core automotive markets, current conditions for specialized products appear to necessitate immediate adjustments.

Future Outlook for Cleveland Cliffs and the US Steel Industry

Cleveland Cliffs' recent capacity adjustments offer insights into both the company's strategic direction and broader industry trends. Despite the idlings, the company has framed these moves as "temporary" and maintained an optimistic outlook about potential restarts when market conditions improve¹⁰.

For the Dearborn facility specifically, Cleveland Cliffs has explicitly tied its potential restart to President Trump's policies taking "full effect and automotive production is re-shored"¹⁰. This perspective aligns with the company's public support for "Buy American" initiatives and domestic manufacturing¹⁹. Cleveland Cliffs has even implemented an employee incentive program to encourage the purchase of American-made products, particularly highlighting its alignment with President Trump's "America-First" agenda¹⁹.

The planned restart of the Cleveland Works blast furnace demonstrates that idling decisions are indeed reversible when market conditions warrant. This facility, which was idled in September 2024 due to declining automotive steel demand, is now scheduled to resume operations¹⁶. Such dynamic capacity management suggests that Cleveland Cliffs views its production network as flexible, capable of adjusting to changing market conditions rather than permanent contraction.

Market projections for steel demand remain complex, with different sectors showing varying trends. While automotive production—a key market for Cleveland Cliffs—has experienced weakness, cited as the primary reason for the Dearborn idling¹⁴, other sectors may show different patterns. The company's focus on its "core business" suggests a strategic prioritization of automotive and other flat-rolled steel applications where it perceives stronger long-term opportunities.

Long-term industry trends point toward continued consolidation, technological advancement, and specialization among steel producers. Cleveland Cliffs has positioned itself as North America's largest flat-rolled steel producer and supplier of iron ore pellets¹⁹, indicating a strategic focus on scale and integration. The recent acquisition of Steelco Holdings Inc. further diversified the company's way from the auto sector¹⁴, suggesting a recognition of the benefits of market diversification.

Conclusion

Cleveland Cliffs' decision to idle three steel plants in Pennsylvania and Illinois represents a strategic response to specific market conditions rather than a fundamental shift in the company's outlook or capabilities. By adjusting capacity for products "outside of Cliffs' core business focus"¹, the company appears to be optimizing its production footprint while maintaining its primary focus on automotive and other flat-rolled steel applications.

These capacity adjustments highlight the dynamic nature of the steel industry, where producers must continuously balance production capabilities with market demand and pricing realities. While protective trade measures like tariffs aim to strengthen the position of domestic steel producers, companies must still make pragmatic business decisions based on current market conditions while anticipating future policy impacts.

For workers, communities, and customers affected by these idlings, the designation of these moves as "temporary" offers some hope for eventual restarts. Cleveland Cliffs' explicit linking of potential restarts to policy implementation and market improvements suggests that these facilities may resume operations under the right conditions.

The broader implications for the US steel industry include potential shifts in specialized product markets, possible pricing adjustments for affected products, and evolving supply chain relationships. As Cleveland Cliffs and other domestic producers navigate changing market conditions and policy environments, their capacity decisions will continue to shape the landscape of American steel production.

Check out some of our other recent articles on the subject:

[Nucor Raises Prices: Analyzing the 7th Consecutive CSP / HRC Increase](#)

[Robotics Transforming Steel Manufacturing and the Automotive Industry](#)

[Nucor's Six-Week Price Surge: What It Signals for the Steel Market](#)

[Nucor Increases Steel Prices Again](#)

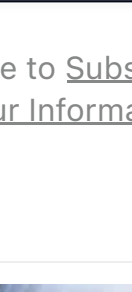
[Steel Industry and Manufacturing Demand: Understanding the Critical Decline in HVAC and Agricultural Equipment Sectors in 2025](#)

🔥 Enjoying this article? Don't miss the next one.

Subscribe to the **Steel Industry News** email newsletter to get the latest updates delivered straight to your inbox — from mill pricing to market shifts.

Stay informed with a **free subscription**, or
Unlock even more with a **paid plan** (just \$10.50/month with annual billing) and get:

- Full access to all in-depth newsletters
- U.S. mill pricing, input costs, and production data
- The latest Steel Industry News direct to you
- Exclusive subscriber-only reports, guides & archives
- Support independent steel journalism at its best

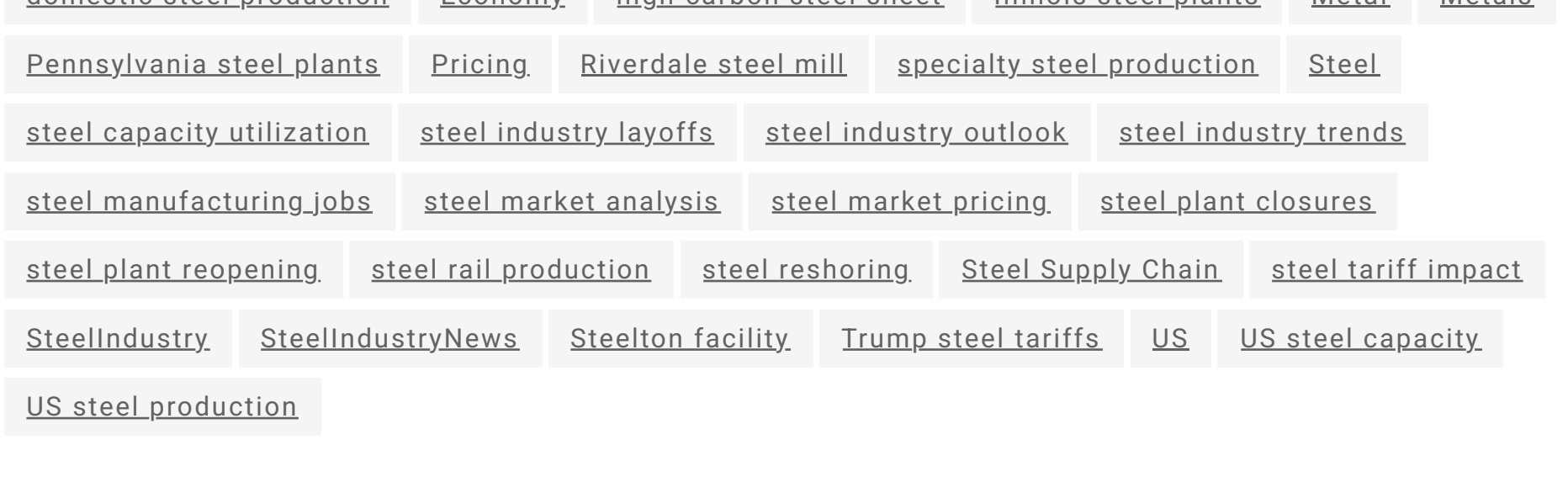


Steel Industry Newsletter

Get the latest Steel News delivered straight to your inbox

By subscribing you agree to [Substack's Terms of Use](#), our [Privacy Policy](#), and our [information collection notice](#)

#substack



Tags: [automotive steel demand](#) [blast furnace idling](#) [Cleveland Cliffs Dearborn](#) [Cleveland Cliffs idling](#) [Cleveland Cliffs iron ore](#) [Cleveland Cliffs strategic moves](#) [Conshohocken steel plant](#) [domestic steel production](#) [Economy](#) [high-carbon steel sheet](#) [Illinois steel plants](#) [Metal](#) [Metals](#) [Pennsylvania steel plants](#) [Pricing](#) [Riverdale steel mill](#) [specialty steel production](#) [Steel](#) [steel capacity utilization](#) [steel industry layoffs](#) [steel industry outlook](#) [steel industry trends](#) [steel manufacturing jobs](#) [steel market analysis](#) [steel market pricing](#) [steel plant closures](#) [steel plant reopening](#) [steel rail production](#) [steel reshoring](#) [Steel Supply Chain](#) [steel tariff impact](#) [Steel Industry](#) [Steel Industry News](#) [Steeltown facility](#) [Trump steel tariffs](#) [US](#) [US steel capacity](#) [US steel production](#)

Previous Post: [The Steel Renaissance: Hot Rolling, Galvanizing, and Stainless Steel Innovation](#)

Next Post: [Nucor Lowers Steel Pricing in Market](#)

Recommended For You



Nucor Raises Prices: Analyzing the 7th Consecutive CSP / HRC Increase

By STEEL INDUSTRY NEWS EDITOR | 12/08/2025

The U.S. steel market is witnessing a decisive shift in momentum as it enters the final weeks of 2025.



Robotics Transforming Steel Manufacturing and the Automotive Industry

By STEEL INDUSTRY NEWS EDITOR | 12/04/2025

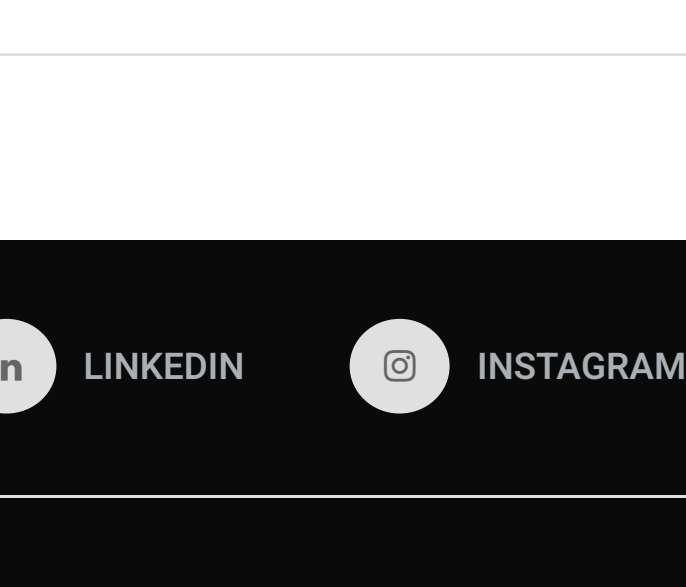
The robotics industry stands at a pivotal moment as Figure AI unveils its groundbreaking Figure 03 humanoid robot, representing a quantum leap in autonomous manufacturing...



Nucor's Six-Week Price Surge: What It Signals for the Steel Market

By STEEL INDUSTRY NEWS EDITOR | 12/01/2025

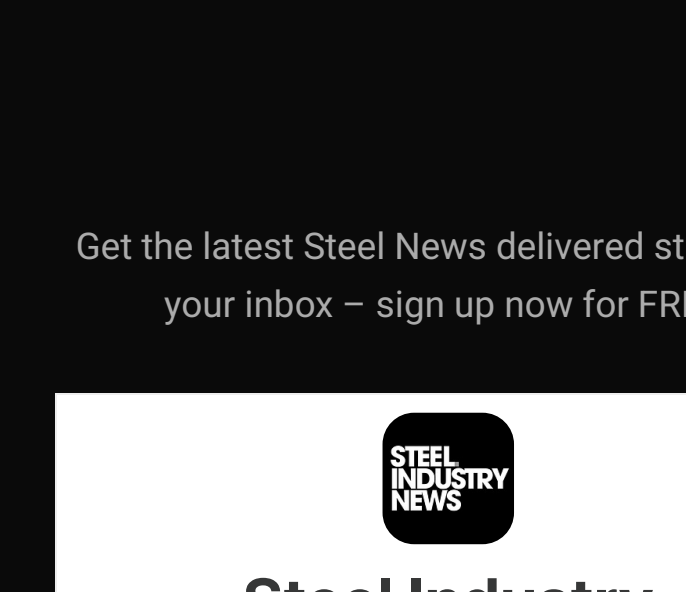
In the fast-paced world of steel pricing, few events capture the attention of industry participants quite like a sustained, multi-week price rally. Nucor Corporation, North...



Nucor Increases Steel Prices Again

By STEEL INDUSTRY NEWS EDITOR | 11/24/2025

The steel industry continues to experience significant momentum as Nucor Corporation, the largest steel producer in the United States, announces its fifth consecutive weekly price...



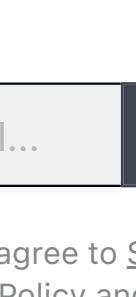
Steel Industry and Manufacturing Demand: Understanding the Critical Decline in HVAC and Agricultural Equipment Sectors in 2025

By STEEL INDUSTRY NEWS EDITOR | 01/19/2025

The steel industry stands at a critical juncture in 2025, facing unprecedented challenges from two of its largest downstream consumption sectors— heating, ventilation, air conditioning...

LINKEDIN INSTAGRAM THREADS FACEBOOK TWITTER YOUTUBE TIKTOK RSS

Get the latest Steel News delivered straight to your inbox — sign up now for FREE!



Steel Industry Newsletter

Get the latest Steel News delivered straight to your inbox

By subscribing you agree to [Substack's Terms of Use](#), our [Privacy Policy](#), and our [information collection notice](#)

#substack

CATEGORIES

- Blog
- Community
- Poll
- Economy
- Executive Leadership
- Logistics
- Markets
- Agriculture
- Automotive
- Construction
- Distribution
- Housing
- HVAC
- Manufacturing
- Raw Materials
- Scrap
- Metals
- Philosophy
- Steel Mills
- Imports
- Pricing
- Sales
- Steel Production
- Trade
- Tariffs
- Technology
- AI
- Announcements
- Cybersecurity
- Decarbonization
- Robotics
- Software

STEEL INDUSTRY NEWSLETTER

The latest Steel Industry News Direct To Your Inbox

SUBSCRIBE

Accept

Settings

X



RE: [EXTERNAL] Re: Final July 2025 Invoice: Transitional Service Agreement

From Finan, Paul R <Paul.Finan@clevelandcliffs.com>

Date Thu 2025-09-25 2:08 PM

To Jason Norris <jason.norris@dura-bond.com>; Walker, Charles T <Charles.Walker@clevelandcliffs.com>; Anna Hall <anna.hall@dura-bond.com>; Tyler Ballew <Tyler.Ballew@dura-bond.com>

This Message is from outside of your organization - Think before you Click!

Jason,

These are our costs to support your business with the labor we have and under our current union contracts. We are not allocating anything to you related to "marketing" the site, which is a ridiculous accusation.

You seem to be suggesting we are not charging you appropriately. We are trying to help out your business in a fair way and are being accused of not acting responsibly. We do not appreciate that.

Our original estimates were estimates. We have never run the site as it is currently being run, so those estimates were to the best of our knowledge, and now you have actuals.

If you do not want us to provide these services to you anymore, please let us know.

Thanks,
Paul



PAUL R. FINAN

Executive Vice President, Strategic Development

P 216.694.6544 M 216.280.4255 paul.finan@clevelandcliffs.com

CLEVELAND-CLIFFS INC.

200 Public Square, Suite 3300

Cleveland, OH 44114-2315

From: Jason Norris <jason.norris@dura-bond.com>

Sent: Thursday, September 25, 2025 1:15 PM

To: Walker, Charles T <Charles.Walker@clevelandcliffs.com>; Anna Hall <anna.hall@dura-bond.com>; Tyler Ballew <Tyler.Ballew@dura-bond.com>

Cc: Finan, Paul R <Paul.Finan@clevelandcliffs.com>

Subject: Re: [EXTERNAL] Re: Final July 2025 Invoice: Transitional Service Agreement

Dear Charles,

Thank you for the information provided. However, it does not fully address my concerns regarding the significant cost increases. To ensure a fair and sustainable partnership, I seek further clarification and documentation on the following issues. I am open to discussing solutions via phone or in person in Cleveland at your earliest convenience.

1. **Labor Costs for Maintaining Electrical Assets (\$183,597 Increase):** The reported \$183,597 increase in labor costs, attributed to maintaining electrical assets at a rate exceeding \$80 per hour with 24 staff members plus supervision, lacks sufficient justification. Given that Cleveland-Cliffs is actively marketing the site and has an interest in preserving its assets, I believe these costs should be shared proportionally rather than fully borne by us. Please provide a detailed breakdown of the labor and supervision charges, including the number of hours, specific tasks, and necessity of the staffing level.
2. **Electricity Cost Increase (\$220,000/month from \$100,000/month):** The monthly electricity bill has risen from \$100,000 to \$220,000. I have repeatedly requested a copy of the PPL Electric Utilities invoice to review these charges. PPL has indicated potential cost-saving measures due to reduced load but requires Cleveland-Cliffs' permission to discuss these with us. I kindly request that you provide the invoice and grant permission for direct discussions with PPL to explore cost reductions.
3. **Security Costs (\$40,000/month):** The \$40,000 monthly security cost appears excessive. As Cleveland-Cliffs benefits from maintaining the site's integrity, I request a review of this expense and consideration of cost-sharing arrangements.
4. **Railroad Charges and Federal Common Carrier Obligations:** Under federal common carrier laws, railroads are obligated to provide service without imposing additional costs for labor, maintenance, or fuel. While the revenue credit mitigates the impact, I request clarification on why these charges are included and whether they comply with legal obligations.
5. **Natural Gas Costs:** I request a copy of the natural gas bill to evaluate the charges and explore opportunities for cost reduction.

These cost increases have raised our hourly operating rate by over 15%, placing us at a competitive disadvantage compared to peers like Berg Pipe and other spiral weld competitors using API plate from Burns Harbor. I have discussed these concerns with USW President Dave McCall, seeking his support to address any unnecessary staffing costs.

While we will continue to make payments on the invoices, we do so under protest, as we believe the full burden of these costs is unfair. I am committed to finding a mutually beneficial solution and welcome the opportunity to discuss this further. Please let me know your availability for a call or meeting.

Thank you for your attention to these matters.

Sincerely,



Jason Norris | *President*
5790 Kennedy Avenue
Export, PA 15632
www.dura-bond.com

P: 724-387-4336 F: 724-327-0113
M: 724-882-0801 E: jason.norris@dura-bond.com

From: Walker, Charles T <Charles.Walker@clevelandcliffs.com>
Sent: Tuesday, September 16, 2025 3:17 PM
To: Jason Norris <jason.norris@dura-bond.com>; Anna Hall <anna.hall@dura-bond.com>; Tyler Ballew <Tyler.Ballew@dura-bond.com>
Cc: Finan, Paul R <Paul.Finan@clevelandcliffs.com>
Subject: RE: [EXTERNAL] Re: Final July 2025 Invoice: Transitional Service Agreement

This Message is from outside of your organization - Think before you Click!

Hi Jason- here are some follow ups to July's hourly labor and natural gas. I will be sending the August final invoice later today

Hourly Labor & Benefits

1. We had 24 hourly employees in the plant and 9 at the railroad for July
2. The 24 hourly plant employees were estimated at \$13,333 per month or \$319,992
3. The 9 hourly railroad employees were estimated at \$116,938

Natural Gas

1. For natural gas we allocated 10% of the plant allocation- which was 5% of the total charge
2. But the higher cost appears to be due to a minimum pipeline charge- since the price was an inflated \$13.31 per unit

Thanks

Chuck



CHUCK WALKER

Senior Vice President, Treasurer

P 216-694-7764 M 216-392-5984 charles.walker@clevelandcliffs.com

CLEVELAND-CLIFFS INC.

200 Public Square, Suite 3300, Cleveland, OH 44114-2544

From: Jason Norris <jason.norris@dura-bond.com>
Sent: Friday, September 5, 2025 3:14 PM
To: Walker, Charles T <Charles.Walker@clevelandcliffs.com>; Anna Hall <anna.hall@dura-bond.com>; Tyler Ballew <Tyler.Ballew@dura-bond.com>
Cc: Finan, Paul R <Paul.Finan@clevelandcliffs.com>
Subject: [EXTERNAL] Re: Final July 2025 Invoice: Transitional Service Agreement

This Message Is from an External Sender

This message came from outside your organization. Stop, think, and use caution before clicking links or opening attachments.
Chuck,

Will you be sending any back up with this? For instance, the hourly labor went from \$253,333 to \$436,930 and the natural gas seems high for July.

Thank you,



Jason Norris | President

5790 Kennedy Avenue

Export, PA 15632

www.dura-bond.com

P: 724-387-4336 F: 724-327-0113

M: 724-882-0801 E: jason.norris@dura-bond.com

From: Walker, Charles T <Charles.Walker@clevelandcliffs.com>

Sent: Friday, September 5, 2025 2:38 PM

To: Anna Hall <anna.hall@dura-bond.com>; Tyler Ballew <Tyler.Ballew@dura-bond.com>

Cc: Jason Norris <jason.norris@dura-bond.com>; Finan, Paul R <Paul.Finan@clevelandcliffs.com>

Subject: Final July 2025 Invoice: Transitional Service Agreement

This Message is from outside of your organization - Think before you Click!

Hi all- please see our final invoice for July 2025 based on the transitional service agreement

Thanks

Chuck



CHUCK WALKER

Senior Vice President, Treasurer

P 216-694-7764 M 216-392-5984 charles.walker@clevelandcliffs.com

CLEVELAND-CLIFFS INC.

200 Public Square, Suite 3300, Cleveland, OH 44114-2544

From: Walker, Charles T <Charles.Walker@clevelandcliffs.com>

**NOR 42184 - COMPLAINT
EXHIBIT F**

Sent: Thursday, August 28, 2025 9:17 AM

To: Tyler Ballew <Tyler.Ballew@dura-bond.com>; Jason Norris <jason.norris@dura-bond.com>;
Finan, Paul R <Paul.Finan@clevelandcliffs.com>

Subject: RE: [EXTERNAL] RE: Provisional Invoice: Transitional Service Agreement

This Message is from outside of your organization - Think before you Click!

Money received- thanks

From: Tyler Ballew <Tyler.Ballew@dura-bond.com>

Sent: Thursday, August 28, 2025 8:54 AM

To: Walker, Charles T <Charles.Walker@clevelandcliffs.com>; jason.norris <jason.norris@dura-

bond.com>; Finan, Paul R <Paul.Finan@clevelandcliffs.com>

Subject: RE: [EXTERNAL] RE: Provisional Invoice: Transitional Service Agreement

Good morning, Chuck.

The August provisional invoice is scheduled to be paid today. It should be received by tomorrow at the latest.

Tyler Ballew, CPA
Vice President of Finance



5790 Kennedy Avenue
Export, PA 15632
(724) 387-4340
tyler.ballew@dura-bond.com

From: Walker, Charles T <Charles.Walker@clevelandcliffs.com>

Sent: Thursday, August 28, 2025 8:48 AM

To: Jason Norris <jason.norris@dura-bond.com>; Finan, Paul R <Paul.Finan@clevelandcliffs.com>

Cc: Tyler Ballew <Tyler.Ballew@dura-bond.com>

Subject: RE: [EXTERNAL] RE: Provisional Invoice: Transitional Service Agreement

This Message is from outside of your organization - Think before you Click!

Hi Tyler & Jason

Just reminding you that we have another provisional invoice due on Friday for August (and we will be sending September's provisional invoice that day as well)

We are waiting on one number for provide the final invoice for July- but at best case it will be Friday- most likely next week

In future months I would expect the final invoice will be available mid-month

Thanks

Chuck



CHUCK WALKER

Senior Vice President, Treasurer

P 216-694-7764 M 216-392-5984 charles.walker@clevelandcliffs.com

CLEVELAND-CLIFFS INC.

200 Public Square, Suite 3300, Cleveland, OH 44114-2544

From: Walker, Charles T
Sent: Thursday, July 31, 2025 4:06 PM
To: Jason Norris <jason.norris@dura-bond.com>; Finan, Paul R <Paul.Finan@clevelandcliffs.com>
Cc: Tyler Ballew <Tyler.Ballew@dura-bond.com>
Subject: RE: [EXTERNAL] RE: Provisional Invoice: Transitional Service Agreement

Thanks guys

We have received

Chuck

From: Jason Norris <jason.norris@dura-bond.com>
Sent: Thursday, July 31, 2025 3:33 PM
To: Finan, Paul R <Paul.Finan@clevelandcliffs.com>
Cc: Walker, Charles T <Charles.Walker@clevelandcliffs.com>; Tyler Ballew <Tyler.Ballew@dura-bond.com>
Subject: Re: [EXTERNAL] RE: Provisional Invoice: Transitional Service Agreement

No worries. We took care of it.
Sent from my iPhone

On Jul 31, 2025, at 9:08 PM, Finan, Paul R
<Paul.Finan@clevelandcliffs.com> wrote:

This Message is from outside of your organization - Think before you Click!

Thanks Jason – apologies if there was any confusion, but my commentary about August 12 was strictly meant to say we will not have actuals until then so we are charging a provisional amount due today. You will see the actuals in future invoices.

Paul

<image001.png>

PAUL R. FINAN

Executive Vice President, Strategic Development
P 216.694.6544 M 216.280.4255 paul.finan@clevelandcliffs.com

CLEVELAND-CLIFFS INC.

200 Public Square, Suite 3300
Cleveland, OH 44114-2315

From: Jason Norris <jason.norris@dura-bond.com>

Sent: Thursday, July 31, 2025 3:06 PM

To: Walker, Charles T <Charles.Walker@clevelandcliffs.com>

Cc: Tyler Ballew <Tyler.Ballew@dura-bond.com>; Finan, Paul R
<Paul.Finan@clevelandcliffs.com>

Subject: Re: [EXTERNAL] RE: Provisional Invoice: Transitional Service Agreement

I authorized payment but it was my understanding with Paul that the books would be closed on August 12 and a correct invoice would be sent. Either way, it will be paid.

Sent from my iPhone

On Jul 31, 2025, at 8:56 PM, Walker, Charles T
<Charles.Walker@clevelandcliffs.com> wrote:

**This Message is from outside of your organization -
Think before you Click!**

Tyler- that was not my instruction and I confirmed with Paul Finan that he never said that either. We need this invoice paid today and we will true up later. You are welcome to pay the reduced amount (the \$339,500) but we need to be paid today.

Thanks

Chuck

<image001.gif>

CHUCK WALKER

Senior Vice President, Treasurer

P 216-694-7764 M 216-392-5984 charles.walker@clevelandcliffs.com

CLEVELAND-CLIFFS INC.

200 Public Square, Suite 3300, Cleveland, OH 44114-2544

From: Tyler Ballew <Tyler.Ballew@dura-bond.com>
Sent: Thursday, July 31, 2025 2:46 PM
To: Walker, Charles T <Charles.Walker@clevelandcliffs.com>
Cc: jason.norris <jason.norris@dura-bond.com>; Finan, Paul R <Paul.Finan@clevelandcliffs.com>
Subject: [EXTERNAL] RE: Provisional Invoice: Transitional Service Agreement

This Message Is from an External Sender

This message came from outside your organization. Stop, think, and use caution before clicking links or opening attachments.

Good afternoon Chuck,

We were told that the provisional invoice would be trued up based on actual costs when July is closed, around the 12th of August, and we were to pay based off that invoice.

Please advise.

Tyler Ballew, CPA
Vice President of Finance

<image002.png>

Dura-Bond Industries
5790 Kennedy Avenue
Export, PA 15632
(724) 387-4340
tyler.ballew@dura-bond.com

From: Walker, Charles T <Charles.Walker@clevelandcliffs.com>
Sent: Thursday, July 31, 2025 2:42 PM
To: Anna Hall <anna.hall@dura-bond.com>; Tyler Ballew <Tyler.Ballew@dura-bond.com>
Cc: Jason Norris <jason.norris@dura-bond.com>; Finan, Paul R <Paul.Finan@clevelandcliffs.com>
Subject: RE: Provisional Invoice: Transitional Service Agreement

This Message is from outside of your organization -
Think before you Click!

Hi all- we have not received payment for our provisional invoice from July and today is the due date. Executives at Cliffs are awaiting word for when payment comes in and I will get asked again today.

Also, we will be sending August's provisional invoice tomorrow at the updated rate.

Any status you can give me about payment would be greatly appreciated.

Thanks

Chuck

<image001.gif>

CHUCK WALKER

Senior Vice President, Treasurer

P 216-694-7764 M 216-392-5984 charles.walker@clevelandcliffs.com

CLEVELAND-CLIFFS INC.

200 Public Square, Suite 3300, Cleveland, OH 44114-2544

From: Walker, Charles T

Sent: Tuesday, July 1, 2025 3:34 PM

To: anna.hall@dura-bond.com; tyler.ballew@dura-bond.com

Cc: jason.norris@dura-bond.com; Goncalves, Lourenco

<Lourenco.Goncalves@clevelandcliffs.com>; Finan, Paul R

<Paul.Finan@clevelandcliffs.com>

Subject: Provisional Invoice: Transitional Service Agreement

Hi all- please see our provisional invoice for July 2025 based on the transitional service agreement

Thanks

Chuck

<image001.gif>

CHUCK WALKER

Senior Vice President, Treasurer
P 216-694-7764 M 216-392-5984 charles.walker@clevelandcliffs.com

CLEVELAND-CLIFFS INC.
200 Public Square, Suite 3300, Cleveland, OH 44114-2544

From: Walker, Charles T <Charles.Walker@clevelandcliffs.com>

NOR 42184 - COMPLAINT

Sent: Wednesday, November 19, 2025 2:21 PM

EXHIBIT G

To: Anna Hall <anna.hall@dura-bond.com>; Tyler Ballew <Tyler.Ballew@dura-bond.com>

Cc: Jason Norris <jason.norris@dura-bond.com>; Finan, Paul R <Paul.Finan@clevelandcliffs.com>

Subject: Final October 2025 Invoice: Transitional Service Agreement

This Message is from outside of your organization - Think before you Click!

Hi all- please see our final invoice for October 2025 based on the transitional service agreement

A couple points about this month's invoice:

- Hourly and salary expenses were lower than last month primarily because of high health care charges in September
- Car hire expense is significantly higher because Dura Bond ordered in a lot of rail cars in October. These cars are laden with steel plate that they had not unloaded by month end. The demurrage that we charge Dura Bond for these cars is not calculated nor billed until the car is released back out onto the road. So, the expense tends to come before the revenue.
 - Although revenue is about \$100k higher in October, the accrual for car hire payable expense lowers the revenue credit.
- There is still no actual water charge for October- so we stayed with the provisional amount

Thanks

Chuck



CHUCK WALKER

Senior Vice President, Treasurer

P 216-694-7764 M 216-392-5984 charles.walker@clevelandcliffs.com

CLEVELAND-CLIFFS INC.

200 Public Square, Suite 3300, Cleveland, OH 44114-2544

From: Weyman JR, William C <William.Weyman@clevelandcliffs.com>

**NOR 42184 - COMPLAINT
EXHIBIT H**

Sent: Thursday, November 6, 2025 2:14 PM

To: Ryan Norris <rnorris@dura-bond.com>; Jason Norris <jason.norris@dura-bond.com>

Subject: Notice of Railroad Operations Closure

This Message is from outside of your organization - Think before you Click!

Jason/Ryan/Durabond,

Please be advised that, as of October 30, 2025, Cleveland Cliffs has made the decision to cease operations of the Steelton and Highspire Railroad, effective January 13, 2026.

The initial plan had been to maintain operations pending a potential acquisition; however, circumstances have changed, and that plan will no longer proceed. We regret any adverse impact this decision may have on your operations.

Should you require any assistance or additional information in the interim, please do not hesitate to contact me.



BILL WEYMAN
SECTION MANAGER OPERATIONS- SCRAP & SHRR
P 717.986.2710 F 717.986.2712 M 717.513.7694
william.weyman@clevelandcliffs.com

CLEVELAND-CLIFFS INC.
Cleveland-Cliffs Steelton LLC
215 South Front Street, Steelton, PA 17113
P 717.986.2000 clevelandcliffs.com

From: [Weyman JR, William C](#)
To: [jason.norris](#)
Cc: [Bradon J. Smith](#); [Chappell, Cory D](#)
Subject: RE: [EXTERNAL] Contract Termination
Date: Monday, December 8, 2025 10:31:04 AM

Hi Jason,

Thanks for the notice. I have forwarded this correspondence onto the appropriate personnel for review and awaiting further instruction. At this time, we cannot make any commitments regarding current or future services until we receive additional guidance.

Please direct any further communications to me and I will ensure they are routed accordingly.

Thanks again



BILL WEYMAN
SECTION MANAGER OPERATIONS- SCRAP & SHRR
P 717.986.2710 F 717.986.2712 M 717.513.7694
william.weyman@clevelandcliffs.com

CLEVELAND-CLIFFS INC.
Cleveland-Cliffs Steelton LLC
215 South Front Street, Steelton, PA 17113
P 717.986.2000 clevelandcliffs.com

From: Jason Norris <jason.norris@dura-bond.com>
Sent: Monday, December 8, 2025 9:57 AM
To: Weyman JR, William C <William.Weyman@clevelandcliffs.com>
Cc: Bradon J. Smith <bsmith@fletcher-sippel.com>
Subject: [EXTERNAL] Contract Termination

This Message Is from an External Sender

This message came from outside your organization. Stop, think, and use caution before clicking links or opening attachments.

Hi Bill,

Please see the attached notice of termination of the demurrage contract.

Thank you,



Jason Norris | *President*

5790 Kennedy Avenue
Export, PA 15632

www.dura-bond.com

P: 724-387-4336 F: 724-327-0113

M: 724-882-0801 E: jason.norris@dura-bond.com

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

NOR 42184

DURA-BOND PIPE, L.L.C.
v.
CLEVELAND-CLIFFS RAILWAYS INC.

AND

EP 346 (Sub-No. 29)

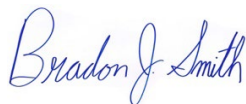
RAIL GENERAL EXEMPTION AUTHORITY — PETITION OF AAR TO EXEMPT
RAIL TRANSPORTATION OF SELECTED COMMODITY GROUPS

CERTIFICATE OF SERVICE

I certify that on December 9, 2025 I caused the Complaint, Motion for Preliminary Injunction, and Petition for Partial Revocation of Dura-Bond Pipe, L.L.C. filed in the respective captioned dockets to be served on:

Cleveland-Cliffs Railways Inc.
c/o The Corporation Trust Company
Corporation Trust Center
1209 Orange St.
Wilmington, DE 19801

Jeffrey T. Black
Group Counsel, Procurement
Cleveland-Cliffs Steel Corporation
9227 Centre Point Dr.
West Chester, OH 45069



Bradon J. Smith