IND 005 462 601

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF
DE-9J

JUN 25 2003

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Richard J. Morris
Vice President and General Manager
ISG Indiana Harbor Inc.
3001 Dickey Road
East Chicago, Indiana 46312-1610

RE: RCRA § 3013 Administrative Order
ISG Indiana Harbor, Inc.
U.S. EPA ID No. IND 005 462 601
R 3013-5-03-002

Dear Mr. Morris:

Enclosed is an Administrative Order issued to ISG Indiana Harbor Inc. (ISG) by the United States Environmental Protection Agency (U.S. EPA) pursuant to Section (§) 3013 of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended by the Hazardous and Solid Waste Amendments of 1984, 42 U.S.C. § 6934.

The Order requires ISG to conduct monitoring, testing, analysis and reporting, in connection with ISG facility located at 3001 Dickey Road, East Chicago, Indiana. The Order also requires ISG to submit a proposal for such monitoring, testing, analysis and reporting not later than thirty (30) days from the date this Order is issued. ISG may request a conference with U.S. EPA to discuss the Order. Any such conference must be held during the thirty (30) days after the issuance of the Order.

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UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:	)	**RCRA Docket** R 3013-5-03-002
	)	
ISG Indiana Harbor Inc.	)	
3001 Dickey Road	)	
East Chicago, Indiana 46312	)	
	)	
EPA ID No. IND 005 462 601	)	**PROCEEDING UNDER SECTION**
	)	**3013 OF THE RESOURCE**
Respondent.	)	**CONSERVATION AND RECOVERY**
	)	**ACT, 42 U.S.C. § 6934**

ORDER REQUIRING MONITORING, TESTING, ANALYSIS AND REPORTING

I. JURISDICTION

1. This Administrative Order (Order) is issued pursuant to the authority vested in the Administrator of the United States Environmental Protection Agency (EPA) by Section 3013 of the Resource Conservation and Recovery Act, as amended, 42 U.S.C. § 6934 (RCRA). The authority to issue this Order has been delegated to the Regional Administrator by EPA Delegation No. 8-20 dated May 11, 1994, and further delegated to the Chief, Enforcement and Compliance Assurance Branch, Waste Pesticides and Toxics Division, Region 5 (Branch Chief) by Region 5 Delegation No. 8-20, dated April 24, 1996 .

2. This Order is issued to ISG Indiana Harbor Inc. (ISG or Respondent), a corporation organized under the laws of the State of Delaware.

3. On January 31, 1986, the State of Indiana received final authorization pursuant to RCRA Section 3006(b), 42 U.S.C. § 6926(b), to operate a hazardous waste program in lieu of the federal hazardous waste program established under RCRA Subtitle C. Pursuant to the Memorandum of Agreement (MOA) between the State of Indiana and EPA, EPA expressly retains its rights to issue Orders and bring actions under Section 3013 of RCRA and any other applicable federal statute.

galvanized steel and tin and chromium electroplated steels. The facility originally opened in the early 1900s as the Marks Steel Company. Subsequently, Youngstown Sheet and Tube Company, Jones & Laughlin Steel Corporation (Jones & Laughlin) and LTV Steel Company, Inc. (LTV Steel) owned and operated the plant. ISG acquired the plant from LTV Steel on April 12, 2002.

11. Pursuant to Section 3010 of RCRA, 42 U.S.C. § 6930, on or about August 15, 1980, Jones and Laughlin notified EPA that it generated and treated, stored or disposed of hazardous waste at the facility.[1] On its notification of hazardous waste activity form (EPA Form 8700-12), Jones & Laughlin identified the hazardous wastes that it handled as F016, K062 and K087.

12. Pursuant to Section 3005(e) of RCRA, 42 U.S.C. § 6925(e), on or about November 14, 1980, Jones & Laughlin submitted to EPA a Part A Hazardous Waste Permit Application to treat, store or dispose of hazardous waste at the facility. In the Part A application, Jones & Laughlin stated that it stored K062 and D007 hazardous waste in tanks and treated F006 waste in its Central Wastewater Treatment Plant.

13. Hazardous Waste No. K062 consists of spent pickle liquor generated by steel finishing operations of facilities within the iron and steel industry. See 40 C.F.R. § 261.32. The hazardous constituents found in K062 are hexavalent chromium and lead. See Appendix VII to 40 C.F.R. Part 261.

14. Hazardous Waste No. K087 consists of decanter tank tar sludge from coking operations. See 40 C.F.R. § 261.32. The hazardous constituents found in K087 are phenol and naphthalene. See Appendix VII to 40 C.F.R. Part 261.

15. Hazardous Waste No. D007 is chromium. See 40 C.F.R. § 261.24, Table 1.

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[1] EPA first promulgated regulations on May 19, 1980 (45 Fed. Reg. 33073), for the identification and listing of wastes that are regulated under RCRA as hazardous wastes for purposes of 40 C.F.R. Parts 262 through 265, 268, 270, 271, and 124 (regulatory hazardous wastes). Regulatory hazardous wastes include wastes that are designated by waste codes beginning with the letters D, F, K, P and U. Waste codes D000 through D003 are described in 40 C.F.R. §§ 261.21 through 261.23. Waste codes D004 through D043 are described in 40 C.F.R. § 261.24. Wastes codes beginning with "F" are listed and described in 40 C.F.R. § 261.31. Waste codes beginning with "K" are listed and described in 40 C.F.R. § 261.32. Waste codes beginning with "P"and waste codes beginning with "U" are listed and described in 40 C.F.R. § 261.33.

The scope of RCRA § 3013 extends not only to such regulatory hazardous wastes, but also to wastes that are hazardous wastes pursuant to RCRA § 1004(5), even though they might not be regulatory hazardous wastes. See 40 C.F.R. § 261.1(b)(1).

SWMU # 1 - Blast Furnace Filter Cake Pile

21. SWMU #1 consists of Blast Furnace Filter Cake Pile which sits directly on the ground in a semi-enclosed area with no roof located at the northern corner of the Sinter Plant. The blast furnace wastewater treatment plant treats blast furnace scrubber waters and uses a vacuum drum filter to remove solids as a filter cake. The Blast Furnace Filter Cake Pile is an active unit from which filter cake is removed on a routine basis and processed for reuse as raw material feedstock in the Sinter Plant. Analytical results of samples of the Blast Furnace Filter Cake collected by LTV Steel from 1994 through 2000 show the presence of, among other things, nickel, barium, chromium, lead, arsenic, and cadmium. The release potential to the surrounding soils, groundwater and surface water is high because the unit has no release controls.

SWMU # 7 - "The Hill"

22. SWMU #7, also known as "The Hill," is a landfill used for disposal of solid waste located northeast of the Terminal Lagoon. In a November 9, 2001 report prepared for EPA, LTV Steel stated that use of this unit was terminated in August 1989 and that this landfill was used to manage wastes similar to those placed in the Clark Landfill. Wastes placed in the Clark Landfill include BOF precipitator dust, terminal lagoon sludge, reladle/ desulfurization dust, tandem mill (6-Stand) oily sludge, caster scale pit sludge, roll shop wastes, ladle metallurgical facility (LMF) baghouse dust and general mill clean-up material. Analytical result show that these wastes contain, among other things, barium, cadmium, chromium, lead, and phenols. See paragraphs 26 through 29 below. This unit has no release controls. The lack of release controls and the nature of the waste managed indicate a high release potential to the soil, groundwater and surface water.

SWMU # 8 - The Terminal Lagoon

23. SWMU #8 is a large water treatment lagoon containing process water from the Blast Furnaces, Sinter Plant, Basic Oxygen Furnaces (BOF) and Powerhouse. It is an active unit. Data submitted by LTV Steel to IDEM on March 28, 1991 in its renewal application for a National Pollutant Discharge Elimination System (NPDES) permit show that discharges to the Terminal Lagoon contain, among other things, lead, cyanide and phenols. Analytical results of sludge samples collected by LTV Steel in 1987 and 1989 from Terminal Lagoon show the presence of, among other things, arsenic, barium, cadmium, chromium, and lead. The release potential to soil, groundwater and surface water is high because this unit has no release controls.

SWMU #9 - Terminal Lagoon Oil Skimmer Tank

24. SWMU #9 is an oil skimmer tank that is part of an old oil separation system associated with the Terminal Lagoon (SWMU #8). It is located on the southwest side of the

28. Analytical results of samples collected by LTV Steel of roll shop wastes in 1989 show the presence of, among other things, cadmium, chromium, and lead. Two of the samples of roll shop waste collected in 1989 exceeded the regulatory level for toxicity for chromium established by EPA in Table 1 of 40 C.F.R. § 261.24. In addition, one sample collected by LTV Steel in 1991, two samples collected in 1993, two samples collected in 1996 and one sample collected in 1997 exceeded the regulatory level for chromium.

29. On September 17 and 18, 1996, PRC Environmental Management, Inc., an EPA contractor, collected 13 samples of roll-shop waste from the facility. These samples were analyzed by EPA. At least four of the samples contained chromium in concentrations above the 5mg/l regulatory level established at 40 C.F. R 261.24.

30. On August 6, 1997, the foundation underlying the Clark Landfill failed and a portion of the toe of the landfill foundation moved both horizontally and vertically into LTV Steel's water intake flume. The movement of the landfill foundation allowed a portion of the landfill itself to drop into the void left by the moving foundation. As a result, LTV Steel estimated that between 11,000 and 18,000 cubic yards of landfill is now below the water table. LTV Steel did not conduct chemical testing to determine the impact of the landfill failure on the groundwater or water intake flume.

31. LTV Steel submitted an application for an interim solid waste (non-hazardous waste) permit for the Clark Landfill to IDEM on August 29, 1989. IDEM did not issue a solid waste permit for the landfill. In a May 20, 1996 letter to IDEM, LTV Steel stated that it intended to discontinue the use of the landfill after May 1998 and withdrew its application for a solid waste permit.

32. Waste disposal at the Clark Landfill ceased in March 1998. LTV Steel submitted an amended permit application for closure of the Clark Landfill as a non-hazardous landfill to IDEM on July 30, 1999. The permit application includes, among other things, a ground water sampling and analysis plan for four monitoring wells, a closure plan and a post-closure plan.

SWMU #23 - Filter Backwash Pile Site

33. SWMU #23 is the Filter Backwash Pile Site consisting of a pile of wastewater treatment sludge sitting outside, directly on the ground, on the north side of the 84-inch Hot Strip Mill. In a November 9, 2001 report prepared for EPA, LTV Steel stated that the Filter Backwash Pile Site has been eliminated or closed. Analytical results of samples of the 84-inch wastewater treatment filter backwash collected by LTV Steel from 1994 through 2000 show the presence of, among other things, nickel, barium, cadmium, chromium, lead, creosol and phenol. The release potential to soil and groundwater is high because there are no release controls associated with this unit.

Steel show the presence of barium, cadmium, chromium, lead, silver, acenaphthene and napthalene. The release potential to groundwater and soil at this site is very high as documented by the results of groundwater samples.

SWMU #67 - Sinter Plant

38. SWMU #67 is the Sinter Plant at which flue dust from the H3 and H4 blast furnaces and blast furnace wastewater treatment plant recycle sludge, among other things, are fused into a porous mass for charging into the blast furnace. During the RFA, an IDEM inspector observed spillage all around the plant. Analytical results of samples of the blast furnace wastewater treatment plant sludge collected by LTV Steel in 1997 show the presence of, among other things, nickel, barium, cadmium, chromium, lead, and arsenic. Analytical results of samples of the H3/H4 flue dust collected by LTV Steel in 1997 show the presence of, among other things, nickel, barium, chromium, and lead. The release potential to soil and groundwater is high because of the spillage visible all around the plant.

SWMU #68 - Sinter Plant Feedstock Piles

39. SWMU #68 is the Sinter Plant Feedstock Piles which consist of several huge feedstock piles which sit outside, directly on the ground. In a November 9, 2001 report prepared for EPA, LTV Steel stated that the feedstock is primarily flue dust from the H3 and H4 blast furnaces and blast furnace wastewater treatment plant recycle sludge. As stated above, analytical results of samples of the blast furnace wastewater treatment plant sludge collected by LTV Steel in 1997 show the presence of, among other things, nickel, barium, cadmium, chromium, lead, and arsenic. Analytical results of samples of the H3/H4 flue dust collected by LTV Steel in 1997 show the presence of, among other things, nickel, barium, chromium, and lead. The release potential to soil and groundwater is high because the unit has no release controls.

SWMU #73 - Old Quenching Area

40. SWMU #73 is the Old Quenching Area located in the Heckett operation area next to the west bridge. Spent pickle liquor (K062) from the basic oxygen furnace was poured out of tankers onto piles for the purpose of quenching hot slag materials. As stated above, the hazardous constituents found in K062 are hexavalent chromium and lead. See Appendix VII to 40 C.F.R. Part 261. There are no release controls associated with this unit and the release potential to surface water, soil and groundwater is high.

Area of Concern (Former Coking Area)

41. This is the former coking area east of the facility designated on a facility map provided by LTV Steel to IDEM as Coke Plant #1. The area may have been used to manage decanter

Cadmium toxicity is influenced by water hardness, the harder the water the lower the toxicity. It has chronic and acute toxicity to aquatic life.

E. Chromium: Acute exposure to chromium dust can cause "metal fume fever", which causes fevers, chills, and muscle aches. Chromium is highly persistent in water and has a half-life of greater than 200 days. Hexavalent chromium is soluble and more mobile in groundwater than the trivalent chromium. Hexavalent chromium has a high acute and chronic toxicity to aquatic life.

F. Creosol: When creosols are breathed, ingested or applied to the skin at very high levels, effects observed in people include irritation and burning of skin, eyes, mouth and throat; abdominal pain and vomiting; heart damage; anemia; liver and kidney damage; facial paralysis; and coma. U.S. EPA has determined that creosols are possible human carcinogens.

G. Cyanide: Exposure to high levels in the air for a short time harms the brain and heart and may cause coma and death. Low level exposure may result in breathing difficulties, heart pains, vomiting, blood changes, headaches and enlargement of the thyroid gland.

H. Lead: Lead is a probable teratogen in humans. The primary routes of exposure are through inhalation and ingestion. Chronic health effects include decreased fertility in male and females; kidney and brain damage. Chronic lead exposure causes nerve and behavioral effects in humans and could cause similar effects in birds and animals. Water hardness controls the toxicity of lead to aquatic life, the softer the water the greater the toxicity. It has a high chronic toxicity to aquatic life.

I. Nickel: The most common adverse health effect in humans is an allergic reaction. Lung effects, include chronic bronchitis and reduced lung function. The U.S. Department of Health and Human Services has determined that nickel and certain nickel compound may reasonably be anticipated to be carcinogens.

J. Naphthalene: Very high levels of naphthalene can cause hemolytic anemia and damage the kidneys, liver and eyes. Naphthalene has moderate acute and chronic toxicity to aquatic life.

K. Phenol: Skin exposure to high levels causes liver damage, diarrhea and hemolytic anemia.

hazardous waste into or on any land or water so that such solid waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters."

V. FINDING OF SUBSTANTIAL HAZARD

Upon the basis of the foregoing Findings of Fact, and pursuant to Section 3013(a) of RCRA, 42 U.S.C. § 6934(a), EPA makes the following determinations:

49. Hazardous wastes within the meaning of Section 1004(5) of RCRA, 42 U.S.C. § 6903(5), are present at the facility and were treated, stored or disposed there.

50. The presence of hazardous wastes at the facility and/or the release of hazardous wastes from the facility may present a substantial hazard to human health or the environment.

51. The action required by this Order are reasonable to ascertain the nature and extent of such hazard.

VI. ORDER

52. Based on the Findings of Fact, Conclusions of Law and Findings of Substantial Hazard as set forth above, Respondent is hereby ordered, pursuant to Section 3013 of RCRA, 42 U.S.C. § 6934, to submit three (3) copies of a written proposal to EPA within thirty (30) days from the issuance of this Order, for carrying out monitoring, testing, analysis, and reporting in order to ascertain the nature and extent of the hazard posed by the hazardous wastes that are present at or that may have been released from the Respondent's facility. Respondent is hereby ordered to implement such proposal once approved, or modified and approved, by EPA. All work undertaken pursuant to this Order shall be performed in a manner consistent with EPA Region 5's Environmental Investigations Standard Operating Procedures and Quality Assurance Manual. Such written proposal shall be specific and shall include, but is not limited to, the following:

    A. A soil sampling and analysis work plan, including schedule and proposal for progress reports, to collect and analyze representative soil samples to determine the nature and extent of any soil contamination in and around all of the SWMUs and AOC identified above. The plan shall include the number, location, depth of samples, the parameters of the analyses, and quality assurance measures.

followed by EPA.

55. Based on work performed under the work plans described above, EPA may determine that additional investigation, analysis, and/or reporting is necessary to meet the purposes of this Order. If EPA determines that Respondent shall perform additional work, EPA will notify Respondent in writing and specify the basis for its determination that additional work is necessary. Within fifteen (15) days after the receipt of such determination, Respondent shall have the opportunity to meet or confer with EPA to discuss the additional work. If required by EPA, Respondent shall submit for EPA approval a work plan for the additional work. EPA will specify the contents of such work plan. Such work plan shall be submitted by Respondent within thirty (30) days of receipt of EPA's determination that additional work is necessary, or according to an alternative schedule established by EPA.

56. The written proposal and all reports or documents required to be submitted under this Order shall be mailed to:

Jonathan Adenuga, Project Coordinator
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, IL 60604

VII. SUBMISSIONS / AGENCY REVIEW

57. EPA will review all plans, reports, or other submittals required under this Order. EPA may: (a) approve the submission; (b) approve the submission with modifications; (c) disapprove the submission and direct Respondent to re-submit the document after incorporating EPA's comments; or (d) disapprove the submission and assume responsibility for performing all or any part of the work. As used in this Order, the terms "approval by EPA," "EPA approval," or a similar term means the action described in (a) or (b) of this paragraph.

58. Prior to approval in writing, or approval with modifications in writing, no plan, report, or other submittal shall be construed as approved and final. Oral advice, suggestions, or comments given by EPA representatives will not constitute approval, nor shall any oral approval or oral assurance of approval be considered as binding.

59. Upon receipt of a notice of disapproval in paragraph 57(c) above or a request for a modification, Respondent shall, within fifteen (15) days, or such longer time as specified by EPA in its notice of disapproval or request for modification, correct the deficiencies

project contact.

66. Respondent shall provide EPA with a written notice of any change in its Project Coordinator. Such notice shall be provided at least seven (7) calendar days prior to the change in Project Coordinator.

IX. THREATS TO PUBLIC HEALTH OR THE ENVIRONMENT

67. If EPA's Project Coordinator determines that activities in compliance or noncompliance with this Order have caused or may cause a release of hazardous waste or waste constituents, or a threat to the public health or to the environment, EPA may require that Respondent stop further implementation of this Order for such a period of time as may be needed to abate any such release or threat and/or undertake any action which EPA determines is necessary to abate such release or threat; and may require Respondent to resume implementation of this Order.

X. SAMPLING AND DOCUMENT AVAILABILITY

68. The Respondent shall submit to EPA upon request, the results of all sampling and/or tests or other data generated by, or on behalf of, the Respondent in implementing the requirements of this Order.

XI. ACCESS

69. Respondent shall provide access at all reasonable times to the facility and facility property and to all records and documentation relating to conditions at the facility and the activities conducted pursuant to this Order to EPA and its employees, contractors, agents, consultants, and representatives. These individuals shall be permitted to move freely at the facility in order to conduct activities which EPA determines to be necessary.

70. To the extent that activities required by this Order, or by any approved work plans prepared pursuant hereto, must be done on property not owned or controlled by Respondent, Respondent will use its best efforts to obtain site access agreements in a timely manner from the present owners of such property. Best efforts as use in this paragraph shall include the payment of reasonable compensation in consideration of granting access. Respondent shall ensure that EPA's Project Coordinator has a copy of

75. Respondent may assert a business confidentiality claim in the manner described in 40 CFR § 2.203(b) covering all or part of any information submitted to EPA pursuant to this Order. Any assertion of confidentiality shall be adequately substantiated by Respondent when the assertion is made in accordance with 40 CFR § 2.204(e)(4). Information submitted for which Respondent has asserted a claim of confidentiality as specified above shall be disclosed by EPA only to the extent and manner permitted by 40 CFR Part 2, Subpart B. If no such confidentiality claim accompanies the information when it is submitted to EPA, it may be made available to the public by EPA without further notice to the Respondent.

XIV. RESERVATION OF RIGHTS

76. EPA expressly reserves all rights and defenses that it may have, including the right to disapprove of work performed by Respondent pursuant to this Order.

77. EPA expressly reserves all statutory and regulatory powers, authorities, rights, remedies, both legal and equitable, including any which may pertain to Respondent's failure to comply with any of the requirements of this Order, specifically including, without limitation, the right to commence a civil action against Respondent seeking an order requiring compliance with this Order and/or the assessment of penalties under § 3013(e) of RCRA, 42 U.S.C. § 6934(e), and all rights EPA has pursuant to RCRA § 3013(d) to conduct monitoring, testing, analysis at the facility and to seek reimbursement from Respondent for the costs of such activity. This Order shall not be construed as a covenant not to sue, or as a release, waiver or limitation of any rights, remedies, defenses, powers and/or authorities, civil or criminal, which EPA has under RCRA, the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), the Safe Drinking Water Act (SDWA), the Clean Air Act (CAA), or any other statutory, regulatory, or common law enforcement authority of the United States.

78. EPA expressly reserves all rights and defenses that it may have, including the right both to disapprove of work performed by Respondent pursuant to this Order, and to order that Respondent perform additional tasks.

XV. OTHER APPLICABLE LAWS

79. All actions required to be taken pursuant to this Order shall be undertaken in accordance with the requirements of all applicable federal, state, and local laws, regulations, permits,

86. Modifications in any schedule adopted pursuant to this Order may be made in writing by EPA's Project Coordinator.

87. No informal advice, guidance, suggestions, or comments by EPA shall be construed to modify the requirements of this Order. Routine communications exchanged verbally, in person or by telephone, between the parties to facilitate the orderly conduct of work contemplated by this Order shall not alter or waive any rights and/or obligations of the parties under this Order.

XVIII. STATEMENT OF SEVERABILITY

88. If any provision or authority of this Order, or the application of this Order to any party or circumstances, is held by any judicial or administrative authority to be invalid, the application of such provisions to other Parties or circumstances and the remainder of the Order shall not be affected thereby.

XIX. TERMINATION AND SATISFACTION

89. Respondent may seek termination of this Order by submitting to EPA a written document which indicates Respondent's compliance with all requirements of this Order, and the associated dates of approval correspondence from EPA. The provisions of this Order shall be deemed satisfied upon Respondent's and EPA's execution of an "Acknowledgment of Termination and Agreement for Record Preservation and Reservation of Rights" (Acknowledgment). The Acknowledgment shall specify that Respondent has demonstrated to the satisfaction of EPA that the terms of this Order, including any additional tasks determined by EPA to be required pursuant to this Order, have been satisfactorily completed.

90. The provisions of this Order shall be deemed satisfied upon Respondent's receipt of written notice from EPA that Respondent has demonstrated to the satisfaction of EPA that the terms of the Order, including any additional tasks determined by EPA to be required pursuant to this Order, have been satisfactorily completed. This notice shall not, however, terminate Respondent's obligations to comply with any continuing obligations hereunder, including without limitation, Section XII (Record Preservation), XIV (Reservation of Rights), XV (Other Applicable Laws).

Order, EPA may commence a civil action in accordance with Section 3013(e) of RCRA, 42 U.S.C. § 6934(e), to require compliance with such Order and to assess a civil penalty (consistent with 40 CFR Part 19) not to exceed $5,500 for each day during which such failure or refusal occurs.

93. If EPA determines that Respondent is not able to conduct the activities required by this Order in a satisfactory manner, or if actions carried out are deemed unsatisfactory, then EPA or its representatives may conduct such actions deemed reasonable by EPA to ascertain the nature and extent of the hazard at the property and/or facility of Respondent. Respondent may then be ordered to reimburse EPA or its representatives for the costs of such activity pursuant to Section 3013(d) of RCRA, 42 U.S.C. § 6934(d).

XXII. EFFECTIVE DATE/DATE OF ISSUANCE

94. The effective date of this Order is the date it is signed by the Branch Chief. The date of issuance of this Order shall be the same date as the effective date.

IN THE MATTER OF ISG INDIANA HARBOR INC.
3001 DICKEY ROAD
EAST CHICAGO, INDIANA
IND 005 462 601

IT IS SO ORDERED

Joseph M. Boyle

Joseph Boyle, Chief
Enforcement & Compliance Assurance Branch
Waste, Pesticides and Toxics Division
U.S. Environmental Protection Agency/ Region 5

June 24, 2003

Date

TABLE I-1

List of SWMUs

SWMU	SWMU Name
1	Blast Furnace Filter Cake Pile
2	Sinter Plant Cyclone
3	Sinter Plant Precipitator
4	Outfall 009
5	Outfall 010
6	Sinter Plant Scrubber
7	"The Hill"
8	Terminal Lagoon
9	Oil Skimmer Tank
10	Terminal Lagoon Sludge Pit
11	Ladle Metallurgy Facility Baghouse
12	Bosch Tank Drain Clarifier Sludge Roll-Off
13	Outfall 011
14	Reladle Desulfurization Baghouse
15	Basic Oxygen Furnace
16	Refuse Pile Near Basic Oxygen Furnace
17	Basic Oxygen Furnace Precipitator and Ash Output
18	Levy Operation Slag Piles
19	Oil Recovery Unit
20	Clark Materials Landfill
21	No. 1 Scale Pit
22	No. 2 Scale Pit

49	Titzel Used Oil Reclamation Unit
50	No. 2 Tin Mill Waste Chromic Acid Tank
51	No. 2 Tin Mill Sulfuric Acid Spillage
52	Safety-Kleen Parts Washers
53	Used Crankcase Oil Tank and Container Storage
54	Laboratory Waste Accumulation
55	Slab Scarfer Scrubber
56	PCB Storage Area
57	Asbestos Waste Roll-Off
58	Old Lead Baghouse Site
59	Container Storage Area
60	Grit Blast Baghouse
61	Wastewater Treatment Plant Waste Pickle Liquor Storage Tank
62	Chemical Waste Management Roll-Offs
63	Chemical Waste Management Roll-Offs
64	Chemical Waste Management Roll-Offs
65	Coke Plant Decanter Site
66	No. 1 Tin Mill Demolition Rubble Piles
67	Sinter Plant
68	Sinter Plant Feedstock Piles
69	No. 2 Tin Mill Waste Sodium Dichromate Tank Sump
70	No. 2 Sheet Mill Spent Pickle Liquor Tank Sump
71	Blast Furnace Demolition Rubble Piles
72	Cleanup Wastes Staging Area
73	Old Quenching Area
74	Lakefill Area

TABLE I-2

List of AOCs

AOC	AOC Name
A	Titzel Unit Oil Spillage Area
B	Scrap Metal Cutting Area
C	Fuel Oil Spill Area
D	Leaking Underground Fuel Oil Tank(s) Remediation Area
E	Leaking Underground Coating Oil Tanks(s) Remediation Area

Waste, Pesticides and Toxics Division

Type of Document: RCRA §3013 Administrative Order

Name of Document (FacilityName & Location): Order Requiring Monitoring, Testing, Analysis and Reporting at the ISG Steel Company in East Chicago, Indiana

Document # (EPA ID# IND 005 462 601 **Originator/Phone:** Jonathan Adenuga 6-7964

NOTE: Originator and first level supervisor are responsible for assuring that documents are in plain language. All other reviewers should consider plain language in their reviews. See the plain language checklist on the reverse side of this sheet.

Date	Name	Secretary/Chief Initials
6/17/03	Author Jonathan Adenuga	J.A
6/17/03	ECAB Section Chief George Hampton	G. Hampton
	Corrective Action Manager	
6/18/03	Asst. Reg. Counsel CHRIS LISZEWSKI	CRL
	Chief, ORC Section	
6/24/03	ECAB Branch Chief Joseph M. Boyle	JMB
	Robert Springer, Director	
	IL/MI State Coordinator	
	IN/MN State Coordinator	
	OH/WI State Coordinator	
	Congressional/Intergovernmental	
	Relation Officer (AL/ORAC)	
	Deputy RA	
	Regional Administrator	

Return for Mailing _____
(attach official file copy/return w/originator's Copy)

Correction Required _____

REMARKS/COMMENTS