Message

From: Beslow, Mike [beslow.mike@epa.gov]
Sent: 5/12/2017 2:41:12 PM
To: Cullen, Raymond [cullen.raymond@epa.gov]
CC: Dixit, Naeha [dixit.naeha@epa.gov]
Subject: FW: Outfall 001 progress, and proposed investigation

Ray-
Just wanted to keep you in the loop with communication from arcelor.

From: Barnett, Thomas R [mailto:Thomas.Barnett@arcelormittal.com]
Sent: Thursday, May 11, 2017 4:52 PM
To: Beslow, Mike <beslow.mike@epa.gov>
Cc: Mendez, Thomas <mendez.thomas@epa.gov>; Doyle, Kevin <Kevin.Doyle@arcelormittal.com>
Subject: Outfall 001 progress, and proposed investigation

Mike:

Thank you for your e-mail of May 9, 2017. We take very seriously the USEPA concerns noted.

Prior to reporting further on our efforts for investigating and preventing the release of oil from Outfall 001 at the Indiana Harbor Central Wastewater Treatment Plant (CWTP) facility, we believe it is important to clarify a few points made in your email.

Outfall 001

There has been no ongoing release of oil sheen from Outfall 001 since January 12, 2017, as suggested in your e-mail. Outfall 001 is equipped with a steel weir that was installed more than 25 years ago for the express purpose of collecting any floating materials that may reach the discharge structure as well as any entrained material from the Indiana Harbor Ship Canal. In addition, ArcelorMittal has installed oil collection booms inside and outside the steel weir. We have had a weekly maintenance program since February 1st of this year and continuing through the present whereby oil sheens that are collected are removed by vacuum truck. All of these measures have prevented the intermittent releases that we are aggressively investigating with the agencies' support.

To further address your concerns, we have now assigned a vacuum truck to the Outfall site seven days a week. Kenny Manta personnel will change out the soft boom on an as needed basis, and use absorbent squares and a vacuum truck to collect any light sheen that appears in the steel weir containment area. Activities at the Outfall are reported out daily in our inspection submittals for Outfall 001.

To date, ArcelorMittal has spent over $150,000 refurbishing the two clarifiers at the Central Treatment Plant. With the refurbishment, we have been successful in effectively eliminating the facility as a source of visible oil, but oil sheen continues to be collected within the Outfall 001 steel weir.

ArcelorMittal Outfall 001 and Indiana Harbor Ship Canal Infrared Oil Fingerprinting

ArcelorMittal conducted infrared analyses of oil sheens collected on the Indiana Harbor Ship Canal and at Outfall 001 behind the steel weir. The results show a significant number of absorbance peaks in the Indiana Harbor Ship Canal samples from 1800^{-1}cm to 700^{-1}cm that are not present in the Outfall 001 sheen sample. This indicates the discharge from Outfall 001 is not the source of sheen observed in the Canal. That is why we believe access to EPA's and USGS' analyses of oil sheen and sediment samples can be critical in helping to isolate the source for these constituents. As

advised, we have submitted a formal FOIA request for that information. Any assistance you can provide in expediting access to the requested information would be much appreciated.

Outfall 001 Sewer System Ongoing Investigation

The Outfall 001 sewer system has three sources: 1) a south branch that originates at the U. S. Steel East Chicago Tin Operations (ECTO) that goes around the CTP, and that discharges a low volume of cooling water and storm water; 2) the discharge from the IH CWTP process wastewater treatment facility; and, 3) a north branch that contains a low volume of non-contact cooling water and storm water. As reported previously, we have taken and continue to aggressively implement several actions to enhance oil removal at the IH CWTP process wastewater treatment facility. Based on these actions, the process wastewater treatment facility is not a source of visible oil sheen to Outfall 001.

Since February 2017, contractors have removed oil weekly from the south branch of the Outfall 001 sewer system upstream of where Internal Outfall 101 discharges into that sewer. While we have seen improvement in the amount of oil in this sewer system, oil is still visible at the sewer manholes.

At this time, we believe the principal source of visible oil in the containment structure originates from the south branch of the Outfall 001 sewer from ECTO. We are in discussions with U. S. Steel to develop and implement corrective actions. As reported earlier, we are working on characterizing those oils as to source.

ArcelorMittal Planned Investigations

We have provided EPA with AM's work plan outline to conduct a comprehensive investigation and characterization of oil sheens at and near Outfall 001 in the Indiana Harbor Ship Canal and in the Canal upstream and downstream of Outfall 001. We are implementing this plan so as to not delay our investigation consistent with the concerns noted in your May 9 e-mail. Sampling will begin the week of May 15. Should you have any concerns with this process, please let us know immediately. We welcome any suggestions to the plan and would like to confirm whether you are able to meet on either May 22 or May 23 as proposed in my May 8 e-mail.

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