Message

From: Beslow, Mike [beslow.mike@epa.gov]
Sent: 5/8/2017 6:51:58 PM
To: Dixit, Naeha [dixit.naeha@epa.gov]
Subject: RE: 001 investigation approach
Attachments: DraftEmail05082017.docx

Flag: Follow up

I'm moving to word so I can better see the changes being made. Please make your suggested edits

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From: Dixit, Naeha
Sent: Monday, May 8, 2017 1:09 PM
To: Beslow, Mike
Subject: RE: 001 investigation approach

Ex. 5 Attorney Work Product (AWP)

Naeha Dixit
Assistant Regional Counsel
Office of Regional Counsel
U.S. EPA Region 5 (C-14J)
77 W. Jackson Blvd.
Chicago, IL 60604
Phone: (312) 353-5524

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From: Beslow, Mike
Sent: Monday, May 8, 2017 1:02 PM
To: Dixit, Naeha <dixit.naeha@epa.gov>
Subject: RE: 001 investigation approach

Please review before I send.

Ex. 5 Deliberative Process (DP)

From: Barnett, Thomas R [mailto:Thomas.Barnett@arcelormittal.com]
Sent: Monday, May 8, 2017 12:46 PM
To: Beslow, Mike <beslow.mike@epa.gov>
Cc: sean.f.fitzgerald@uscg.mil; Vansumeren, Timothy <timothy.vansumeren@arcelormittal.com>; Mathias, Cary (Contractor) <cary.mathias@arcelormittal.com>; Amendola Gary (g.amendola@amendola-eng.com) <g.amendola@amendola-eng.com>; Doyle, Kevin <Kevin.Doyle@arcelormittal.com>
Subject: 001 investigation approach

Mike,

Thank you for your e-mail of May 1, 2017 regarding our outline of a proposed work plan to address the oil sheen issues at Outfall 001 at the Indiana Harbor Central Wastewater Treatment Plant (IH CWTP) facility. This is part of Arcelor Mittal's comprehensive program to address possible sources of oil discharges to Outfall 001 at IHCWTP and Outfalls 009 and 010 at the Indiana Harbor West facility (IH West) using third party entities for technical support.

We understand that EPA is focusing its efforts on IH CWTP Outfall 001, whereas the Coast Guard is focusing its efforts on IH West Outfalls 009 and 010. Accordingly, we have prepared separate outlines of proposed work plans for IH CWTP and IH West. By design, these outlines share a number of common elements. As stated in my letter of April 5, 2017 to Commander Merchant of the Coast Guard (copy attached), our intent is to present work plan outlines to the agencies, review data the EPA and US Coast Guard have collected thus far, adjust and agree on the scopes of the work plans, and then prepare final work plans and associated quality assurance project plans (QAPPs) prior to implementing the work plans. We appreciate your response to that letter (your e-mail of April 5th), by which you stated that you concur with this framework and conceptual approach.

Your comments of May 1st suggest that we should address oil sheen issues at IH CWTP Outfall 001 before initiating the investigative programs proposed with our work plan outlines. We believe it is critical that the proposed investigative programs for IH CWTP and IH West can and should proceed concurrently with our ongoing efforts to improve operations

and oil removal at the IH CWTP Outfall 101 process wastewater treatment facility and Outfall 001. These were set out in our letter of April 5, 2017 to Commander Merchant, and are listed again below:

- Redirection of oil collected from the clarifiers
- NALCO Iron Guard trials to improve oil separation and removal
- Cleaning of the sewers leading to Outfall 001
- Refurbishing the clarifiers

An update of the work ongoing at the CTP Clarifiers is attached.

As previously discussed, we contracted with a diver to inspect the Outfall 001 sewer at the Indiana Harbor Ship Canal and for a distance of approximately 50 feet upstream of the Outfall 001 structure. Also attached is the dive inspection report provided by Lindahl Marine. In short, the diver did not find any significant accumulations of sediment and found no oily materials associated with the sediments at the Outfall 001 structure (which has a poured concrete base) or in the Outfall 001 sewer for the areas inspected.

In addition, even before the IH CWTP and IH West work plans are agreed on, we are continuing our investigations into the IH CWTP Outfall 001 sewer system for possible sources of oil that could reach Outfall 001 separately from the Outfall 101 treated process wastewater discharges. To that end we are meeting with Tim Sullivan, the USS Environmental Manager for USS Tin this week. We believe this is important because it will likely take some time before final work plans are developed and implemented and we see no reason to wait. Our approach for IH CWTP is entirely consistent with your comments that sources of oil to Outfall 001 should be addressed as soon as possible. Our intent is initiate and complete identified corrective measures as soon as reasonably possible.

By our e-mail of April 10, 2017, we requested that EPA and the Coast Guard provide copies of complete analytical reports (and sample identifications) for oil sheen and sediment samples collected by EPA and the Coast Guard from the Indiana Harbor Ship Canal and from ArcelorMittal outfalls and other locations. To date, we have not received those reports from either agency. We are hereby renewing that request. In addition, please advise for which samples EPA has retained sample extracts. We may request portions of those retained extracts for our analyses as part of the work plans for IH CWTP and IH West.

In summary, we continue to be responsive to concerns raised by EPA and the Coast Guard about the IH CWTP and IH West facilities. We believe our approach is technically sound and will provide information and data that will lead to effective resolutions of the concerns.

We would like to schedule a meeting with EPA and the Coast Guard early during the week of May 15th. Please advise if you are available Monday, May 22nd at 10:30 am or at the same time on Tuesday May 23rd .

Thank you for your continued open communications with us.

Thomas Barnett | Manager, Environmental Technology
ArcelorMittal Indiana Harbor LLC.
ArcelorMittal USA LLC

Environmental Department | 3001 Dickey Road, Sta. 001
East Chicago, IN 46312

T +219 399 2380 | **M** +219 313 1605 | **F** +219 399 3211 | www.arcelormittal.com