ArcelorMittal
Indiana Harbor LLC

ArcelorMittal

April 5, 2017
Commander Merchant
Captain of the Port
U.S. Coast Guard

Subject: Work plans proposal for An Investigation into Oil Sheen present at Outfalls 009/010, and 001

Commander;

We are in receipt of your letter dated March 21, 2017 in regards to the request for a report on the outcome of a third party investigation into oil sheen found in the vicinity of the 009/010 Outfalls, and the 001 Outfall.

Based on a conversation we had at the mill on March 28, 2017 with Lt. Fitzgerald and Mr. Beslow of U.S. EPA Region V, it has become clear to us at ArcelorMittal that the Agencies are requesting a very comprehensive investigation by a third-party into potential sources of oil to the subject Outfalls, including obtaining and analyzing a number of samples from possible offsite sources, possible on-site sources, the outfalls, and relevant processes. In view of this, we believe the best path forward is to use the protocol we use for our Corrective Actions and 3013 Investigative programs; i.e. we present a detailed Work Plan for review and comment, we agree on a final Work Plan and schedule of deliverables, then we proceed.

Given the expanded scope of this effort, and the number of oil sheen and Indiana Harbor Ship Canal sediment samples we expect will be collected, we have requested that Amendola Engineering engage another third party firm that will assist in collecting field samples from the Indiana Harbor Ship Canal at and near ArcelorMittal facilities, as well as a third party firm that specializes in environmental forensics with particular expertise in analysis and assessment of environmental samples involving petroleum products.

The Work Plan will also include a Quality Assurance Project Plan (QAPP) to ensure that the sampling methods and analytical program will produce valid data. The Work Plan will address all field and analytical activities for this large scale project. We anticipate preparing one Work Plan and two study reports, one for Outfall 001 and one for Outfalls 009 and 010.

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For purposes of providing a complete assessment of all relevant information and data, and for informing elements of our draft Work Plan, we request that U.S. EPA and the Coast Guard provide field reports and laboratory analytical reports for all U.S. EPA and Coast Guard observations and sampling and analyses conducted to date. We would appreciate receiving this information within 10 days. We intend to submit a detailed outline of the Work Plan for your review and comment within 10 days after receipt of U.S. EPA and Coast Guard reports noted above. Upon receipt and evaluation of comments on the outline, we will begin preparing the Work Plan. As may be necessary, we would be happy to participate in a meeting to review the Work Plan outline and your comments. We will provide a projected date for submittal of the draft Work Plan once we have Agency comments on the Work Plan outline and the scope is reasonably well defined.

We expect that this overall effort, which will involve a considerable field program and substantial costs for field work, analytical services and engineering services, will likely take a number of months to complete once the Work Plan is final. Please note, however, that while this program is being undertaken, all work ongoing at the Central Wastewater Treatment Plant will continue (redirection of oil from the clarifiers; implementation of the Nalco Iron Guard trial to improve oil removal; continued cleaning of the sewers leading to Outfall 001; and, refurbishing the two clarifiers). Separate from the Work Plan, a subsurface inspection of the Outfall 001 area may be conducted in the near term. If this inspection proceeds, we will advise both agencies in advance of when that is scheduled.

Please call me with any questions you may have. We look forward to working with the Coast Guard and U.S. EPA to resolve this issue.

Sincerely,

Tom Barnett

Tom Barnett
Manager, Environmental Technology
ArcelorMittal Indiana harbor LLC

cc: Kevin Doyle, ArcelorMittal Indiana Harbor LLC
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