Draft: August 11, 2017

Attachment

ArcelorMittal Central Wastewater Treatment Plant
Outfall 001 Discharge Structure Visible Oil
Proposed Plan of Action and Schedule for Ongoing and New Corrective Measures

Introduction

Following is a proposed plan of action and schedule to address visible oil at the CWTP Outfall 001 discharge structure. The basic concept is as follows:

- for U. S. Steel to complete investigative and corrective measures for identified oil sources to the Outfall 001 discharge structure,
  (see separate attachment from U. S. Steel);
- for ArcelorMittal to continue to optimize CWTP treatment system operations; to continue mitigative measures at the U. S. Steel south sewer and at the Outfall 001 discharge structure; and, if feasible, install and operate a new oil collection baffle in the Outfall 001 sewer system;
- after the above measures are implemented, ArcelorMittal will reassess visible oil at the Outfall 001 discharge structure and possible sources; and,
- as may be warranted based on the results of the reassessment, develop a plan for supplemental investigative and remedial measures.

Both ArcelorMittal and U. S. Steel will participate and provide separate monthly progress reports to IDEM by the fifteenth of the following month. ArcelorMittal will provide a Phase 2 progress report as set out below.

Phase 1

ArcelorMittal

Item	Description	Schedule
CWTP treatment system	Continue to optimize operation of CWTP treatment system for purposes of minimizing the potential for discharges of visible oil at the clarifier overflow that discharges to Outfall 101	Ongoing
U. S. Steel south sewer (ArcelorMittal property)	Continue to remove oil on an as needed basis from south sewer access points located on ArcelorMittal property	Ongoing
Outfall 001 discharge structure	Continue operation and maintenance on an as needed basis to remove visible oil from the Outfall 001 discharge structure behind the steel weir.	Ongoing
84" sewer oil baffle	Conduct feasibility study for installation and operation of a new oil collection baffle in the 84" sewer at a location downstream of the U. S. Steel south sewer and CWTP Outfall 101, and upstream of the Outfall 001 discharge structure	Complete by 09/15/17
	If feasible, install and commence operation of new oil collection baffle	Complete by 11/30/17

Phase 2

ArcelorMittal

Item	Description	Schedule
U. S. Steel south sewer (ArcelorMittal property)	Continue to remove oil on an as needed basis from south sewer access points located on ArcelorMittal property	Ongoing
Outfall 001 discharge structure	Continue operation and maintenance on an as needed basis to remove visible oil from the Outfall 001 discharge structure behind the steel weir.	Ongoing
Outfall 001 discharge structure visible oil assessment and characterization	Conduct an Outfall 001 discharge structure visible oil assessment and chemical (fingerprinting) analyses of any visible oil and of potential sources from the CWTP	Complete by 12/31/17

	treatment system and from U. S. Steel operations. To the extent possible, the chemical fingerprinting analyses will be directed at determining whether any remaining visible oil found at the Outfall 001 discharge structure is the result of then current or historical oil discharges (i.e., weathered oil).	

Within 30 days of the conclusion of Phase 2, ArcelorMittal will submit a progress report to IDEM. The progress report will present the results of the Phase 2 activities, then current status of visible oil at the Outfall 001 discharge structure behind the steel weir and any proposed plans for Phase 3 as may be warranted.

Phase 3

To be determined based on results of Phase 2 assessment