



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

August 26, 2020

Via Email to: robert.maciel@arcelormittal.com

Mr. Robert Maciel, Environmental Manager
ArcelorMittal Burns Harbor, LLC
250 West US Highway 20
Burns Harbor, Indiana 46304

Dear Mr. Maciel:

Re: Inspection Summary/ Enforcement Referral
ArcelorMittal Burns Harbor LLC
NPDES Permit No. IN0000175
Burns Harbor, Porter County

An inspection of the above-referenced facility or location was conducted by a representative of the Indiana Department of Environmental Management, Northwest Regional Office, pursuant to IC 13-18-3-9. A summary of the inspection is provided below:

Date(s) of Inspection: August 12, 2020
Type of Inspection: Reconnaissance Inspection
Inspection Results: Violations were observed and will be referred to the Enforcement Section.

The following concerns were noted:

1. Pursuant to 327 IAC 5-2-2, the point source discharge of pollutants to waters of the state is prohibited except in conformity with a valid NPDES permit obtained prior to the discharge.

On June 15, 2020, an incident occurred, which resulted in the discharge of unpermitted wastewater through Outfall 002. The description in the Bypass/Overflow incident report for the event stated that while switching from lake water back to non-contact cooling water, there was a period of 15 minutes when the streams were co-mingled. With the closed water pressure higher than the lake water, closed water passed into the lake water system and discharged with the non-contact cooling water system through Outfall 002 in violation of 327 IAC 5-2-2.

In further discussions with on-site staff, it was determined that both valves with the double block and bleed valve system were open at the same time, introducing once-through lake water into the system and allowed co-mingling of the water streams. A root cause analysis was still being conducted and ArcelorMittal personnel agreed to submit to IDEM and EPA

personnel when it is completed.

2. Self-Monitor was rated as unsatisfactory. The flow meter for Outfall 011 is located at the effluent of the secondary wastewater treatment plant, which is located prior to the lagoons. The sample location for Outfall 011, however, is located after the lagoons. The flow meter and the sampling location are too far apart to enable representative flow proportioned sampling of the Outfall 011 discharge, in violation of the NPDES permit, Part I. C. 1, which requires samples and measurements taken as required to be representative of the volume and nature of the discharge.
3. The Effluent Limits Compliance area was rated unsatisfactory due to self-reported violations of the limits applicable to Outfall 001, set forth in Part I. A. of the NPDES Permit. A review of Noncompliance notifications for May 2020 to July 2020 revealed:
 - Two whole effluent toxicity violations, specifically for *Ceriodaphnia dubia*;
 - One ammonia nitrogen seven day average concentration violation;
 - Eight ammonia nitrogen daily maximum concentration violations; and
 - Two ammonia nitrogen daily maximum loading violations.

These violations were identified based on a review of Noncompliance notifications and not DMR and MMRs, as the July 2020 DMR and MMR is not due until August 28, 2020.

During the discussion of the evaluation of the causes of the Ammonia exceedances, ArcelorMittal personnel stated that sampling of the storm water/non-contact cooling water ditch that contributes to the Outfall 001 discharge is occurring in segments. At the time of the inspection, Phase I of sampling, which included 24 hour composite samples taken at 15 to 20 "segments" along the ditch had concluded, and data was still arriving and being evaluated in an attempt to locate the sources of ammonia into the storm water/non-contact cooling water ditch. On-site personnel added a Phase II will be conducted with greater detail once the Phase I results are analyzed.

This matter is being referred to the OWQ Enforcement Section for appropriate action. If formal action is initiated, you will be issued a Notice of Violation informing you of how to proceed in resolving this matter. Please direct any questions to Nicholas Ream at 219-730-1691 or by email to nream@idem.IN.gov. **If the non-compliance issues addressed in this report/letter are attributable to the COVID-19 pandemic, please provide this information in your response to this Office.** A copy of the NPDES Industrial Facility Inspection Report is enclosed for your records.

Sincerely,



Rick Massoels, Deputy Director
Northwest Regional Office

Enclosure



NPDES Industrial Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: IN0000175	Facility Type: Industrial Major	Facility Classification: D	TEMPO AI ID 12029
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Date(s) of Inspection: August 12, 2020

Type of Inspection: Reconnaissance Inspection

Name and Location of Facility Inspected: ArcelorMittal Burns Harbor LLC 250 West US Highway 20 Burns Harbor IN 46304	County: Porter	Receiving Waters/POTW: East Branch of the Little Calumet River and Lake Michigan	Permit Expiration Date: 6/30/2021
			Design Flow: NA

On Site Representative(s):				
First Name	Last Name	Title	Email	Phone
Joyce	Casillas	Operations	joyce.casillas@arcelormittal.com	
Morgan	Swanson	Environmental Engineer	morgan.swanson@arcelormittal.com	
Robert	Maciel	Environmental Manager	robert.maciel@arcelormittal.com	

Was a verbal summary of the inspection given to the on-site rep? **Yes**

Certified Operator: Pat Gorman	Number: 9310	Class: D	Effective Date: 7-1-19	Expiration Date: 6-30-22	Email: patrick.gorman@arcelormittal.com
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Cyber Security Contact
Name: _____ Email: _____

Responsible Official: Mr. Robert Maciel, Environmental Manager 250 West US Highway 20 Burns Harbor, Indiana 46304	Permittee: ArcelorMittal Burns Harbor, LLC Email: robert.maciel@arcelormittal.com Phone: _____ Fax: _____
Contacted? Yes	

INSPECTION FINDINGS

- Conditions evaluated were found to be satisfactory at the time of the inspection. (5)
- Violations were discovered but corrected during the inspection. (4)
- Potential problems were discovered or observed. (3)
- Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM. (2)
- Violations were discovered and may subject you to an appropriate enforcement response. (1)

AREAS EVALUATED DURING INSPECTION

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Receiving Waters	N	Facility/Site	U	Self-Monitoring	N	Compliance Schedules
S	Effluent/Discharge	N	Operation	N	Flow Measurement		
U	Permit	N	Maintenance	N	Laboratory	U	Effluent Limits Compliance
		N	Sludge	N	Records/Reports	N	Other:

DETAILED AREA EVALUATIONS

Receiving Waters:
Comments:
The receiving stream at Outfall 002 was free of notable foam, algae or solids at the time of the inspection.

Effluent/Discharge:
Comments:
The effluent at Outfall 002 was clear and free of color at the time of the inspection.

Permit:
Comments:
Pursuant to 327 IAC 5-2-2, the point source discharge of pollutants to waters of the state is prohibited except in conformity with a valid NPDES permit obtained prior to the discharge.

Based on a Bypass/Overflow incident report submitted by AMBH, and discussion of the incident report with AMBH representatives at the time of the inspection, it was found that on June 15, 2020, blast furnace gas wash water co-mingled with non-contract cooling water for a period of about 15 minutes, and the co-mingled waste stream discharged through Outfall 002, in violation of 327 IAC 5-2-2. A copy of the Bypass/Overflow incident report is attached. AMBH representatives attributed the incident to operator error, and in particular, the opening of both valves of the double block and bleed valve system that is intended to keep the non-contact cooling water and blast furnace gas wash water streams isolated from one another. AMBH representatives stated that a root cause analysis is being conducted, and the results will be submitted to IDEM and US EPA upon completion.

Self-Monitoring:

Comments:

Self-Monitor was rated as unsatisfactory. The flow meter for Outfall 011 is located at the effluent of the secondary wastewater treatment plant, which is located prior to the lagoons. The sample location for Outfall 011, however, is located after the lagoons. The flow meter and the sampling location are too far apart to enable representative flow proportioned sampling of the Outfall 011 discharge, in violation of the NPDES permit, Part I. C. 1, which requires samples and measurements taken as required to be representative of the volume and nature of the discharge.

Effluent Limits Compliance:

No 1. Were DMRs reviewed as part of the inspection?

Exceedance notification reports for May 2020 to June 2020 were reviewed.

Comments:

The Effluent Limits Compliance area was rated unsatisfactory due to self-reported violations of the limits applicable to Outfall 001, set forth in Part I. A. of the NPDES Permit. A review of Noncompliance notifications for May 2020 to July 2020 revealed:

- Two whole effluent toxicity violations, specifically for *Ceriodaphnia dubia*;
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During the discussion of the evaluation of the causes of the Ammonia exceedances, ArcelorMittal personnel stated that sampling of the storm water/non-contact cooling water ditch that contributes to the Outfall 001 discharge is occurring in segments. At the time of the inspection, Phase I of sampling, which included 24 hour composite samples taken at 15 to 20 "segments" along the ditch had concluded, and data was still arriving and being evaluated in an attempt to locate the sources of ammonia into the storm water/non-contact cooling water ditch. On-site personnel added a Phase II will be conducted with greater detail once the Phase I results are analyzed.

IDEM REPRESENTATIVE

Inspector Name:	Email:	Phone Number:
Nicholas Ream	nream@idem.IN.gov	219-730-1691
Other staff participating in the inspection:		
Name(s)	Phone Number(s)	
Joan Rogers - EPA	312-886-2785	

IDEM MANAGER REVIEW

IDEM Manager:	Date:
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