

AR-13

(Redacted)

**(Information not pertaining to Tentative Decision
on ArcelorMittal Cleveland CWA 301(g)
Variance Request has been redacted)**



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

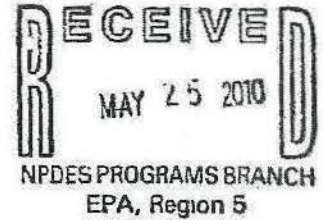
TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

May 24, 2007

Peter Swenson
U.S. Environmental Protection Agency – Region V
77 West Jackson Boulevard
Chicago, IL 60604



Dear Mr. Swenson

In a recent letter, the Ohio EPA recommended that U.S.EPA approve the 301(g) variance requests for ammonia-nitrogen for the ISG Cleveland Works and the [REDACTED]. We recommended that the variance limits for both facilities be continued in the renewed permits.

Since that time, Irv Dzikowski of your staff has requested additional information about conditions at the plants, and in the receiving waters, to show that conditions have not changed at these facilities. This information is provided in this letter and the attachments.

Summaries of the variance reviews for both facilities are attached. For both facilities, blast furnace production has increased slightly during the past five years, and the BPT/BAT calculations reflect this; treatment has not changed for either facility. Receiving water conditions have not changed significantly since the last permit renewals, as explained below.

ISG Cleveland Works discharges to the Cuyahoga River. Since their NPDES permit was last renewed, Ohio EPA has developed a Total Maximum Daily Load (TMDL) report for the lower Cuyahoga River Basin. The recommendations of this report focus on combined sewer overflow abatement and habitat issues. The report specifically states that further controls at ISG are not needed at this time. This report also did not update the ammonia allocation for outfall 604/005 that is presented in our Cuyahoga River Basin rule [OAC 3745-1-26]. Ammonia loads have decreased overall from ISG because of the closure of the facility's other blast furnace (outfall 621/027). In summary, the ammonia wasteload allocation for ISG is the same as it has been for the last 10-15 years, and authorized loads from the facility have decreased.


Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

[REDACTED]

In addition to the review summaries, I have also attached another copy of the companies' requests for renewal of the variance. We are ready to send these permits to public notice whenever we receive your decision on the variances. Please provide your public notice language for inclusion in our public notice, so that the public review periods for the draft permit and the variance will coincide.

We appreciate your staff's attention to these requests. If you need any other information about these variances, please contact Eric Nygaard at (614) 644-2024.

Sincerely,



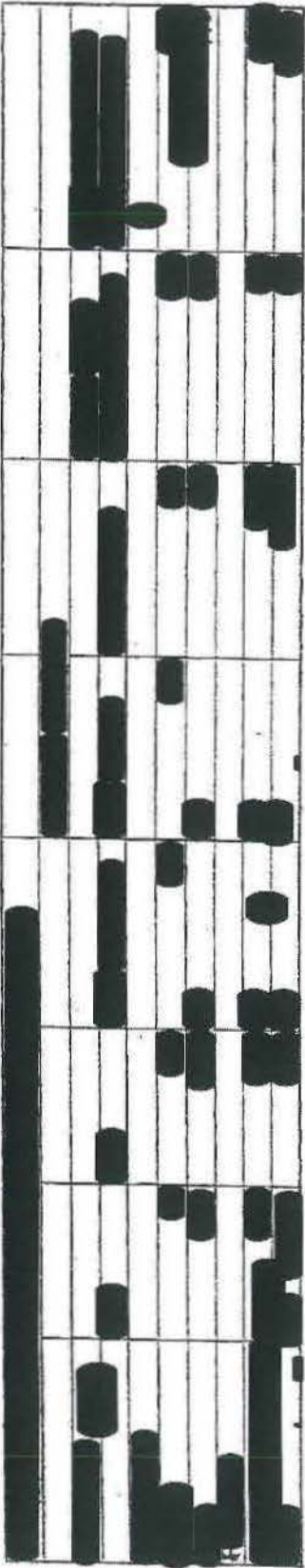
George Elmaraghy, P.E., Chief
Division of Surface Water

GE/EN

cc: Eric Nygaard
Sandy Cappotto, DSW/NEDO
Mary Osika, DSW/SWDO

ISG Cleveland 301(g) Variance Review (all values are kg/day)

	BPT	BAT	WLA	Current Limit	PEQ	Draft Limits	Justification
Ammonia (sum)							
30-day	451	24.5	NA	62.4	38.97	46.8	BPJ / 301g
Daily	1353	73.6	3135	85.6	58.97	73.6	BAT
Ammonia (win)							
30-day	451	24.5	NA	81.6	55.2	66.2	BPJ / 301g
Daily	1353	73.6	2472	211	85.3	102.4	BPJ / 301g



From: "Zavoda, Rich" <Rich.Zavoda@mittalsteel.com>
To: "Eric Nygaard" <Eric.Nygaard@epa.state.oh.us>
Date: 1/18/2007 3:20:51 PM
Subject: ISG Cleveland Inc. - NPDES Permit Renewal

As we discussed, one of your attachments inadvertently included [REDACTED] monthly operating data. Thanks for indicating that you would provide a similar analysis of the ISG Cleveland data.

This is also a confirmation that we are requesting a continuation of the 301g variance for the blast furnace outfall 604. 604 is the treatment plant effluent for the C5 & C6 blast furnaces.

The C1 blast furnace (621) was demolished and was not included in the renewal application, as we discussed.

You indicated that you would be reviewing past effluent quality monthly average data for 604 for the period May 2002 - Dec. 2006. When reviewing the past effluent quality of 604, it should be noted that in the following months, blast furnaces C5 & C6 were not both operating for the entire month:

2002: May, June & July
2003: May, June, July, August & November
2004: July & August
2005: May, June, July & August & November
2006: October, November & December

Although the Electro galvanizing line is currently idled, the permit should allow the line to timely resume operations.

Thanks for agreeing to review the draft O&G monthly average limitation at 017.

Thanks for your continued effort to provide renewal information as it is developed. We look forward to the wasteload allocation once it becomes available.

Rich Zavoda
ISG Cleveland Inc.
216-429-6542