



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 30 2018

REPLY TO THE ATTENTION OF
WC-15J

CERTIFIED MAIL 7016 3560 0000 4829 8405
RETURN RECEIPT REQUESTED

Mr. David M. Shelton
United States Steel Corporation
Law Department
600 Grant Street
Pittsburgh, PA 15219-2800

Subject: United States Steel Corporation Submittal Pursuant to Consent Decree (2:18-cv-00127)
Partial Disapproval of Wastewater Treatment O&M Manual and Preventive
Maintenance Program Plan

Dear Mr. Shelton:

The U.S. Environmental Protection Agency and the Indiana Department of Environmental Management (IDEM) have received and reviewed the United States Steel Corporation's (U. S. Steel) Wastewater Treatment O&M Manual and Preventive Maintenance Program Plan (Manual), submitted pursuant to Paragraph 10 of the Consent Decree in *United States of America and State of Indiana v. United States Steel Corporation* (2:18-cv-00127).

Pursuant to Paragraph 13 of the Consent Decree, EPA and IDEM disapprove the Manual in part as it does not meet all of the terms and conditions of Paragraph 10 of the Consent Decree. In order to cure the deficiencies, the Manual must be revised to contain the information discussed in the following comments:

Comment 1: The Manual lacks operational procedures to help avoid or minimize the impacts from spills and upset conditions at the Chrome Treatment Plant and the Final Treatment Plant. It is important for operators to have quick access to relevant SOPs to help avoid or minimize impacts of events such as the April 2017 spill. Standard operating procedures (SOPs), or at least references to the relevant SOPs, for such events shall be included in the Manual.

Comment 2: In Section III (Laboratory Requirements), U. S. Steel shall include a reference list of all SOPs for laboratory and field instruments (e.g., pH probes) related to NPDES permit compliance monitoring.

Comment 3: In Section IV (Recordkeeping Requirements), and Section VI (Preventive Maintenance Program Plan), U. S. Steel shall include a description of how O&M and preventive maintenance activities such as equipment calibration, repairs, replacements, alterations, maintenance tasks, and vulnerability assessments will be assigned and recorded. For example, does U. S. Steel intend to implement an electronic O&M/PMP system that will automatically assign tasks and record completed activities and repairs? If so, please describe the system and set forth a date certain schedule for implementation if not already on line.

Comment 4: In Section V (Plan for Inspecting, Cleaning and Maintenance of Outfall Channels), U. S. Steel shall include a description of how inspection, cleaning, and maintenance activities will be recorded.

Comment 5: In Section VII (Review of O&M Plan and Preventative Maintenance Program Plan), U. S. Steel shall include operations and preventive maintenance of any wastewater process monitoring system components installed to date. After installation of the Wastewater Process Monitoring System, required pursuant to Paragraph 11 of the Consent Decree, U. S. Steel shall incorporate visual inspection and maintenance of the approved wastewater process monitoring equipment into the next annual review and update of the Manual.

Pursuant to Paragraph 14 of the Consent Decree, U. S. Steel shall resubmit the revised Manual within 30 days of receipt of this letter.

If you have any questions or concerns regarding this letter, contact Dean Maraldo of my staff at 312-353-2098 or via email at maraldo.dean@epa.gov.

Sincerely,



Patrick F. Kuefler, Chief
Water Enforcement and Compliance Assurance
Branch

cc: Arnold Rosenthal, DOJ (via email)
Beth Admire, IDEM (via email)
General Manager, Environmental Affairs, U. S. Steel
General Manager, Midwest Plant, U. S. Steel
Director, Plant Environmental, U. S. Steel