

AR-12 (Redacted)

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



Early warning - 301(g) variance reviews
Eric Nygaard to: Peter Swenson, Sreedevi Yedavalli
Cc: Paul Novak

04/06/2007 01:20 PM

History: This message has been replied to.

I wanted to let you know that we will soon be sending you 301(g) recommendations for [REDACTED] and ISG Cleveland Works. Both facilities currently have 301(g) variances for their blast furnace treatment systems, and would like to renew them.

I have attached draft letters and briefings for these facilities. We will be recommending that you approve the current ammonia limits for these treatment systems. The BPT and water quality analyses have not changed significantly since these permits were last renewed. Note that ISG has shut down one of its blast furnaces, and associated treatment system (Outfall 621), and has requested renewal of the other treatment system (Outfall 604).

We will be recommending that you not approve [REDACTED] request for total phenolics. While they currently have a variance for this parameter, the last five years of DMR data (and probably more) show that this outfall meets BAT for phenolics, as do all of the other blast furnace treatment systems in Ohio. Because they can meet BAT, approving this variance is not appropriate.

Given that nothing much has changed, we were hoping for a quick turnaround (2 weeks from the time you receive our official letter) on the review of these. Ideally, we would like to incorporate your public notice language into our public notice, similar to the way that we did ISG's last permit renewal.

[REDACTED] and ISG Cleveland - 301(g) variance reviews

Both of these facilities have had 301(g) variances approved by USEPA in their current NPDES permits. As part of their NPDES permit renewals both companies have requested that their variances be renewed. We would recommend that USEPA approve both requests for alternate ammonia-nitrogen limits. We would not recommend approval of [REDACTED] current variance for total phenolics because their treatment system can meet BAT requirements.

Section 301(g) of the Clean Water Act allows the USEPA Administrator, with the concurrence of the State, to modify Best Available Treatment (BAT) limits for certain pollutants provided that the discharge can comply with Best Practicable Treatment (BPT) limits and any applicable water quality based effluent limits (WQBELs). In addition, the granting of a 301(g) variance can not result in any additional controls on other point or non-point source. The pollutants that are listed under this variance provision include ammonia-nitrogen and total phenolics.

As part of these permit renewals, Ohio EPA would recommend keeping the current ammonia-N limits. The attachments to each approval recommendation letter show that these limits can meet BPT and WQBELs, but can not meet BAT.

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

Limitations for ISG outfall 604/005:

The current limitations for ammonia are based on the outfall 604 treatment system performance for 1995-98. While current discharge loadings are somewhat lower for 2002-06, we would recommend keeping the same loading limits for the next permit. The Total Maximum Daily Load report for the lower Cuyahoga River indicates that the current loadings from ISG are acceptable for this segment. This portion of the Cuyahoga is impaired mostly by habitat alterations and combined sewer overflows.

Comparison of blast furnace treatment systems:

To put these requests into perspective, the following table shows a summary of the five blast furnace treatment systems, and how their limits compare:

The following table lists out the blast furnace process outfalls in Ohio, ranked from highest to lowest in allowable load.

Facility/ Outfall	Effluent Limits (kg/day)		Basis	Production (kkg/day)	Production Normalized Loads (kg/kkg)	
	30-day	Daily			30-day	Daily
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
ISG Cleveland 604 (sum)	62.4	85.6	301g/BAT	8453	.0074	.0101
ISG Cleveland 604 (win)	81.6	211	301g	8453	.0097	.0250
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

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Peter Swenson
77 West Jackson Boulevard
Chicago, IL 60604

Dear Mr. Swenson

The Ohio EPA is recommending that the 301(g) variance request for the ISG Cleveland Works (NPDES # OH0000957) be renewed for the next permit. ISG has renewed its request for alternative limits for ammonia-nitrogen under Section 301(g) of the Clean Water Act. Their request is attached. We plan to draft a renewed NPDES permit that incorporates the variance. Presuming that this variance is acceptable, we would like to coordinate public notices of the variance and renewal permit early this spring.

Recommended Limits for ammonia (kg/day):

Outfall 604:

	Season 30-day	Daily
summer	62.4	85.56
winter	81.6	211

Our analysis of the current variance, considering BPT, BAT, wasteload allocation and current treatment plant performance is attached. If you have any questions about the limitations, please contact Eric Nygaard at (614) 644-2024.

Sincerely,

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

GE/EN

cc: Eric Nygaard, DSW
Sandy Cappotto, DSW/NEDO
Rich Zavoda, ISG Cleveland

Attachment:

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

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