



CLEVELAND-CLIFFS INC.
Cleveland-Cliffs Burns Harbor LLC
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January 26, 2024

VIA Electronic Mail

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Environmental Law & Policy Center and Hoosier Environmental Council

Howard Learner (on behalf of Environmental Law & Policy Center and Hoosier Environmental Council)
Executive Director

Environmental Law & Policy Center
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Chicago, IL 60601

Subject: Cleveland-Cliffs Burns Harbor LLC
USDC IN/ND case 2:22-cv-00026-PPS-JEM
Consent Decree Semi-Annual Report

To: (as indicated above)

This report is providing Cleveland-Cliffs Burns Harbor LLC's (CCBH) semi-annual Progress Report for July 1, 2023 to December 31, 2023, pursuant to Section VII, Paragraph 50 of the captioned Consent Decree.

1. Section VII., Paragraph 50a. Work performed and progress made toward implementing the requirements of Section IV (Compliance Requirements.)

Section IV, Paragraph 8(a): There was one Blast furnace outage lasting longer than five days in the second half of 2023. This outage began on October 9 and continued until October 13. During these times, additional sampling was conducted at both the Blast Furnace Closed water pumping station and the Secondary Wastewater Treatment Plant.

Section IV, Paragraph 8(b): The ammonia-N treatment system at the Blast Furnace Closed Water Pump Station (BCWPS) began operation May 26, 2023 and remained in service through November 29, 2023.

Section IV, Paragraph 8(c): CCBH resumed operation of the trial ammonia removal system at the Reclamation Services Building (RSB) in late June 2023 and ran it through mid-September. The operation of this trial system will inform the permanent system to be installed by May 31, 2025.

Section IV, Paragraph 9: The Blast Furnace Recycle System treatment systems are being maintained and operated as required by the Consent Decree. This includes maintaining the following equipment:

- Flow restrictors
- Aboveground Lake Michigan water isolation valve
- Rectifier alarms for the pump batteries
- Redundant battery rectifier system including alarm
- Wall seal
- Redundant hot well and cold well water level sensors
- Critical spares for BFCWPS equipment

Section IV, Paragraph 10: The BFCWPS Maintenance Plan was carried out during this half of the year. One mechanical and one instrumentation inspection were not conducted during the week of July 12 due to a miscommunication between supervisors. The next week's inspections were all conducted, and no issues were identified. To prevent recurrence of missed inspections, the tracking process for these procedures was revised. No inspections have been missed since. Upon review of the past year's inspection reports, CCBH has determined a reduced frequency of

instrumental and mechanical inspections will provide adequate coverage for the BFCWPS. Burns Harbor proposes to adjust the required frequency of inspections to at least twice monthly but will continue to inspect more often as needed.

Section IV, Paragraph 11: CCBH has not used Once-through water in the Gas Cleaning system at either Blast Furnace since the effective date of the Consent Decree. The Deerfield Pond is being maintained unused at a minimum of 90% capacity on a weekly basis.

Section IV, Paragraph 12 and 13: Procedures are in place for the diversion and sampling of Once-Through water in the event of a failure at BFCWPS.

Section IV, Paragraph 14: CCBH is only discharging NCCW and storm water from Outfall 002.

Section IV, Paragraph 17: CCBH has complied with all effluent limitations for ammonia-N, free cyanide, and total cyanide during the reporting period.

Section IV, Paragraphs 20 and 21: CCBH has performed sampling as required by its NPDES permit, effective January 1, 2022, for the period covered by this report.

Section IV, Paragraph 23: No material changes to the Earlyman Procedure, Earlyman sheet, or Chain of Custody forms have been made since the last progress report submittal.

Section IV, Paragraphs 24: Procedures are in place for notification of BFCWPS malfunctions and elevated levels of ammonia and cyanide to the Environmental Area Manager.

Section IV, Paragraph 26: Annual training of relevant employees was conducted during the first half of 2023.

Section IV, Paragraphs 27 and 28: No cyanide effluent limits were exceeded. There were no hazardous spills or releases to water.

Section VII., Paragraph 50 b through k: There were no applicable events, noncompliance, or changes during the reporting period.

A statement is attached from Mark Dutler who is the certifying official for Cleveland-Cliffs Burns Harbor. If there are any questions concerning this progress report, please contact Morgan Swanson at 219-787-2646.

Sincerely,



Thomas Maicher
Area Manager, Environmental
Cleveland-Cliffs Burns Harbor LLC

CC: Nick Ream IDEM

Joan Rogers US EPA Region 5

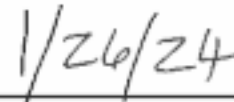
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Consent Decree Semi-Annual Report for 2H 2023

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Mark A. Dutler

Senior General Manager Burns Harbor



Date