



CLEVELAND-CLIFFS INC.
Cleveland-Cliffs Burns Harbor LLC
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January 29, 2025

VIA Electronic Mail

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R5weca@epa.gov

and:

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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
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35 East Wacker Drive, Suite 1600
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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 pursuant to Section VII, Paragraph 50 of the captioned Consent Decree.

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

Section IV, Paragraph 8(a): There was no Blast furnace outages lasting longer than five days in the second half of 2024.

Section IV, Paragraph 8(b): The ammonia-N treatment system at the Blast Furnace Closed Water Pump Station (BCWPS) began operation on April 15, 2024 and remains in service.

Section IV, Paragraph 8(c): CCBH resumed operation of the trial ammonia removal system at the Reclamation Services Building (RSB) in late June 2024 and ran it through mid-September. The operation of this trial system will inform the permanent system to be installed by May 31, 2025. The Operations and Maintenance Plan was submitted in November 2024 and additional detail is being added per EPA request.

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 incorporated into the NPDES permit with an effective date of December 1, 2022. The BFCWPS Maintenance Plan was carried out without issue in the second half of 2024.

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, 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 22: CCBH completed the installation of the Outfall 011 flow meter on April 30, 2023.

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

Section IV, Paragraph 35: IDEM granted a permit modification to allow the diversion of process water to the Deerfield Storage Facility on March 16, 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.

If there are any questions concerning this progress report, please contact Morgan Swanson at 219-787-2646.

Sincerely,



Mark Dutler
Senior General Manager