



Cleveland-Cliffs Steel LLC

Storm Water Pollution Prevention Plan

Indiana Harbor West
3001 Dickey Road
East Chicago, IN 46312

December 2024

(This page intentionally left otherwise blank.)

**Cleveland-Cliffs Steel LLC Indiana Harbor West
Storm Water Pollution Prevention Plan
Table of Contents**

0	REVISION HISTORY	5
1	CERTIFICATION [Part I.E.2.d.(1)]	6
2	STORM WATER POLLUTION PREVENTION TEAM [Part I.E.2.a]	7
2.1	Team Description	7
2.2	Storm water Pollution Prevention Team	7
3.1	Drainage Area SWA-1	8
3.1.1	Iron Producing (Idled)	8
3.2	Drainage Area SWA-2	10
3.2.1	Steelmaking	10
3.2.2	Utilities	11
3.3	Drainage Area SWA-3	12
3.3.1	Former Hot Strip Mill	12
3.4	Drainage Area SWA-4	12
3.4.1	Finishing Storage	12
3.4.2	West Coating	12
3.6	General and Interior Drainage Areas	13
	<i>All general and interior drainage areas listed discharge process and storm water into the process and storm sewers, respectively. No effluents from the areas listed below are discharged to waters of the state.</i>	13
3.6.1	Logistics	13
3.6.2	Environmental Department	14
3.7	Non-Storm Water Discharges [Part I.D.4.i]	15
3.8	Materials Inventory [Part I.E.2.b.(3).(N)]	15
4	STORM WATER CONTROL MEASURES [Part I.D.4]	17
4.1	Minimize Exposure [Part I.D.4.a]	17
4.2	Good Housekeeping [Part I.D.4.b]	17
4.3	Maintenance [Part I.D.4.c]	18
4.4	Spill Prevention and Response [Part I.D.4.d]	18
4.5	Erosion and Sediment Controls [Part I.D.4.e]	19
4.6	Management of Runoff [Part I.D.4.f]	19
4.7	Salt Storage Piles or Piles Containing Salt [Part I.D.4.g]	19
4.8	Employee Training [Part I.D.4.h]	19
4.9	Non-Storm water Discharge [Part I.D.4.i]	19
4.10	Dust Generation and Vehicle Tracking of Industrial Material [Part I.D.4.j]	20
5	PROCEDURES FOR INSPECTIONS AND MONITORING [Part I.D.5-9]	21
5.1	Annual SWPPP Review [Part I.D.5]	21
5.2	Quarterly Inspection of Storm Water Management Measures [Part I.D.9.a-c]	21
5.3	Corrective Actions – Conditions Requiring Review [Part I.D.6-8]	21

5.4	<i>Plan Revisions [Part I.E.1]</i>	22
5.5	<i>Spill Prevention and Response Program [Part I.D.4.d]</i>	23
6	TABLE 1 – OUTFALL LOCATIONS AND DRAINAGE AREAS Including the North Storm-water Lagoon [Part I.E.2.b.(3)]	23
7	TABLE 2 – IMPERVIOUS SURFACES [Part I.E.2.b.(3)]	23
8	TABLE 3 – NON-STORM WATER DISCHARGE ASSESSMENT AND CERTIFICATION [Part I.E.2.c]	24
9	TABLE 4 – MATERIALS INVENTORY [Part I.E.2.b.(3).(N)]	26
9.1	Table 4.1 – SWA – 1 – Ironmaking <i>_(IDLED)</i>	26
9.2	Table 4.2 – SWA – 2 - Steelmaking	27
9.4	Table 4.4 – SWA - 4	29
9.5	Table 4.5 – SWA - 5	30
10	TABLE 5 – SIGNIFICANT SPILLS AND LEAKS [Part I.E.2.b.(3).(H)]	31
10.1	Table 5.1 – SWA - 1	31
10.2	Table 5.2 – SWA - 2	32
10.3	Table 5.3 – SWA - 3	33
10.4	Table 5.4 – SWA - 4	34
10.5	Table 5.5 – SWA - 5	35
12	DRAWINGS [Part I.E.2.b.(1-3)]	37
13	DRAINAGE AREA MAINTENANCE INSPECTION FORMS [Part I.D.10]	45

0 REVISION HISTORY

Date	Modification
December 2024	Minor changes, Reviewed & updated for NPDES permit renewal.
April 2021	Changed name and added CTP & Outfall 001
April 2019	Add EMST members to SWPPP. Clarification of quarterly visual assessments & documentation of corrective actions.
November 2018	Updated company name, removed reference to 60" aluminizing and No. 1 galvanizing lines, other minor changes
November 17, 2017	Changing business conditions (idling 84" Hot Strip Mill) and removal of personnel names. Changes based on new NPDES permit. Updated site drainage maps. New form for the annual SWPPP inspection.
November 6, 2015	Changing business conditions (idling of Cold Mill, Shut Down of No. 2 Sinter Plant) and personnel. Updated tank map based on SPCC plan. Incorporated Annual Waste inspection form in to Comprehensive Site Compliance Evaluation.
May 29, 2013	Original Certification

1 CERTIFICATION [Part I.E.2.d.(1)]

The plan is certified by a qualified professional, trained and experienced in water treatment techniques and related fields as may be demonstrated by state registration, professional certification, or completion of course work that enable the individual to make sound, professional judgments regarding storm water control/treatment and monitoring, pollutant fate and transport, and drainage planning.

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.

Signature:



Name:

Thomas Barnett

Title:

Manager of Environmental

Company:

Cleveland-Cliffs Steel LLC (West)

Certification Date:

12/11/2024

2 STORM WATER POLLUTION PREVENTION TEAM [Part I.E.2.a]

2.1 Team Description

The Environmental Department designates the team members of the Storm Water Pollution Prevention Team. The Storm Water Pollution Prevention Team consists of people who are most familiar with the facility and its operations and are responsible for ensuring that necessary controls are in place to eliminate or minimize the impacts of storm water from the facility. The Environmental Department can be contacted for an emergency at (219) 399-2492.

2.2 Storm water Pollution Prevention Team

The SWPPP coordinator for the facility is Mr. Tom Barnett and along with Ms. Mariya Conlon and Mr. Kevin Lurtz or another designated engineer, have overall responsibilities for the SWPPP preparation and implementation, including the following:

- Create a SWPPP team to aid in the implementation of the SWPPP plan;
- Oversee maintenance practices identified as BMPs in the plan;
- Implement and oversee employee training;
- Conduct or provide for inspection or monitoring activities;
- Identify any deficiencies in the SWPPP and make sure they are corrected;
- Prepare and submit reports as needed;
- Ensure that any changes in facility operation or pollutant sources are addressed in the SWPPP.

The other members of the SWPPP Team are as follows:

Title, Department	Responsibilities
Process Manager, Environmental Lab	Sampling and analysis of storm water discharge per NPDES permit
EMS Team Members	Technical resource
Shift Manager, Internal Logistics	Manage BMPs for storm water areas
Senior Engineer, ENV Engineer, Engineer, Utilities or Designated Nalco Contractor	Certified operator, technical resource, completing inspections

3 POTENTIAL POLLUTANT SOURCES [Part I.E.2.b.(4)]

Indiana Harbor West (IHW) is an integrated iron/steel manufacturing facility. The industrial processes that are conducted at the facility include manufacture of iron, manufacture of steel, operation of rolling mills, and finishing operations. In addition to the steel manufacturing processes, there are numerous support operations that include power generation, wastewater treatment, recycling, and laboratory and research facilities.

Indiana Harbor West is located at 3001 Dickey Road in East Chicago, Indiana. The facility is located southeast of Chicago on the shore of Lake Michigan. A general location map showing the facility and the surrounding areas is included in this SWPPP, in the drawings section. The facility is surrounded by industrial, commercial, and residential properties. The facility is bounded to the east by the Indiana Harbor Ship Canal and Lake Michigan, to the north and west by Lake Michigan, and to the south by industrial and commercial facilities. The nearest residential area, known as Marktown, is located approximately 2,500 feet to the southwest.

The facility has 9 permitted outfalls for discharging non-contact cooling water (NCCW) and treated process water. Five of these are external outfalls, discharging directly to the Indiana Harbor Ship Canal. IHW has no storm water only outfalls. All storm water is discharged through NPDES-permitted non-contact cooling water and process water outfalls. Detailed descriptions of the departments that discharge to each outfall and the management equipment systems used can be found in Section 11 (Table 6).

Principal facilities at Indiana Harbor West include Iron Producing activities consisting of the IH-3 and IH-4 Blast Furnaces (IDLED) which produce iron used for steel production; No. 3 Steel Producing activities, which include one hot metal re-ladle/desulfurization complex, two Basic Oxygen Furnaces (BOFs), a Ladle Metallurgy Facility (LMF), one vacuum degassing (decarbonization) facility and two Continuous Casters; The facility's West Coating operations, located on the southeast corner of the intersection of Dickey Road and Riley Road, consist of a 72" hot dip galvanizing line. Products produced at IHW include steel slabs, Cold Rolled Sheet and Coated Steel products.

A graphical representation of potential pollutant sources at the facility is contained in the drawings section. Material inventory listing, method of storage, and remedial actions can be found in Section 9 (Table 4). Spill History can be found in Section 10 (Table 5).

3.1 Drainage Area SWA-1

3.1.1 Iron Producing (Idled)

The Iron Producing Department produces molten iron for use in the Steelmaking process. The Iron Producing Division consists of 3 Blast Furnace and 4 Blast Furnace (IH3/IH4),

and Material Handling. The blast furnaces consist of the two furnaces, the stoves, gas cleaning equipment and the materials preparation stock houses. Some process areas are outside and are exposed to storm water.

Material Handling

Section 12 identifies outdoor storage areas for raw material piles in the Iron Producing areas. Parts and equipment are also stored in these areas. Outdoor storage areas of chemicals or oils have secondary containment.

Iron ore pellets are delivered by ore boat or barge. A conveyor transports the iron ore from the dock to the raw material storage area for processing. Raw materials are stored outdoors in piles. No. 2 and No. 3 bridges and conveyors get raw materials to the furnace.

The conveyors occasionally require maintenance for continuous operations during freezing weather. When needed, antifreeze is applied to the raw materials to prevent ice from forming on the conveyor belts.

Blast Furnaces

Indiana Harbor West has two blast furnaces that produce molten iron. The raw materials for the blast furnaces consist of iron ore pellets, coke, limestone, and sinter. In the blast furnaces, iron accumulates on the bottom of the furnace with a slag blanket floating on top. The iron is directed into rail cars (submarine cars) and the slag is skimmed from the iron. The skimmed slag flows through a separate runner system into a pit. Slag is temporarily stored at the blast furnaces in slag pits until it is transported for processing by an on-site contractor.

The blast furnace process generates a large volume of CO laden gas. A gas cleaning system is utilized to remove particulates from the gas so it can be used for heating at the blast furnace stoves and Power House. The gas cleaning system includes a dust catcher and Venturi scrubbers that produce flue dust and sludge/filter cake. The flue dust and filter cake are normally recycled back into the process at the No. 3 Sinter Plant at IH East. These materials are temporarily stored outside until reused.

There are outdoor storage areas for blast furnace filter cake, coke, pellets, BOF slag, stone, bauxite and other miscellaneous materials located in the plant. Berms have been constructed where possible, and portions of the ore dock road have been graded away from the Indiana Harbor Ship Canal, in order to prevent storm water runoff directly into the canal.

Blast furnaces are lined with refractory brick that protect the furnaces from the high temperatures necessary to produce molten iron. Periodically the refractory brick must be repaired or replaced. The refractory bricks that are removed are reused, sold, or disposed. After furnace relines, used refractory is periodically stored outdoors, on-site prior to reuse, sale, or disposal.

There is an air pollution control bag house located at 4 Blast Furnace to control casthouse emissions. Good housekeeping procedures have been developed as Best Management Practices to ensure excess dust does not accumulate at the bag house, in order to prevent storm water exposure.

Iron Producing has several outside storage tanks. Outdoor storage areas of chemicals or oils have secondary containment. The SPCC Plan contains loading and unloading procedures that are followed to prevent leaks and spills at these locations.

Blowdown from the IH3/IH4 blast furnace recycle system is treated at the Zinc Treatment Plant prior to discharge through NPDES Outfall #009. Non-contact cooling water (NCCW) is discharged either to NPDES Outfall #010 or to the terminal lagoon, from which it is filtered through the MSD Treatment plant and is discharged through NPDES Outfall #011.

Storm sewers in the Iron Producing area discharge directly to NPDES Outfalls #009 and #010. Best Management Practices have been developed to prevent pollutants from getting into these sewers. **Due to the idling of Iron Producing, all potential storm water pollutants have been eliminated.

3.2 Drainage Area SWA-2

3.2.1 Steelmaking

The Steelmaking operation consists of producing molten steel and casting the steel into solidified rectangular slabs. The two primary areas of operation are the Basic Oxygen Furnace and Casters. The Basic Oxygen Furnace contains vessels that produce steel through a metallurgical process requiring oxygen injection into a mixture of molten iron and scrap. During the oxygen blow, fluxes such as burnt lime, dolomitic lime, and spar are added to obtain proper chemical analysis prior to tap.

During the BOF tapping process, alloys are added to meet metallurgical grade specifications. The ladle of liquid steel is then transported to the ladle treatment facility where final chemistry and quality operations are performed. These operations include steel desulfurization, steel reheat, argon rinsing, and alloy trim additions as required. Once treatment is completed, the steel is directed to the caster facilities.

In the VCP (vacuum degassing) molten steel undergoes treatment to reduce the carbon levels. This is done in order to produce a low carbon steel for sale for electrical usage.

Steelmaking has outdoor storage areas of alloys, flux materials, used lances, and cooled refractory waste, as well as an outdoor loading area for flux.

Steelmaking also has outdoor storage areas for steel slabs, which also store parts and equipment. Outdoor storage areas of chemicals or oils have secondary containment. The SPCC Plan contains loading and unloading procedures that are followed to prevent leaks and spills.

There are several air pollution control bag house devices located throughout the Steelmaking Department. These bag houses are inspected and cleaned periodically per departmental compliance plans. Good housekeeping procedures have been developed as Best Management Practices to ensure excess dust does not accumulate at these bag houses, in order to prevent exposure to storm water. The dust collected at these units are either reused at the Sinter Plant or disposed. Dust from the LMF baghouse is disposed of as hazardous waste.

The basic oxygen furnace and ladles are lined with refractory brick that protect them from the high temperatures necessary to produce molten steel. Periodically the refractory brick must be repaired or replaced. The refractory bricks that are removed are either sold or disposed. After furnace and ladle relines, the used refractory is periodically stored outdoors, on-site prior to disposal.

Each caster utilizes a scale pit used to collect process water and scale from cast steel slabs. These scale pits are located outside. Maintenance is required to ensure the proper operation of the scale pits. These maintenance activities include oil skimming and scale removal. Preventative maintenance is required to ensure that the scale dewaterers back into the scale pits.

All water discharges in this area flow through the plant's process sewers to the terminal lagoon, from which it is filtered through the MSD Treatment plant and is discharged through NPDES Outfall #011.

3.2.2 Utilities

The Indiana Harbor West Utilities Department includes responsibility for the Boiler House, Power House, Central Treatment Plant, MSD Treatment Plant, and the Blast Furnace Recycle Plant.

MSD Treatment Plant

After receiving and filtering water from the terminal lagoon, the waste sludge is pressed, removed from the plant, and placed on the ground in the vicinity. This sludge is removed by pay-loaders to a mixing area where it is solidified for offsite disposal. Berms and grading have been constructed to prevent any runoff from going directly into Lake Michigan or the Indiana Harbor Ship Canal.

Central Treatment Plant

The Central Treatment Plant receives wastewater from: US Steel (USS) No. 2 Pickler; cold rollers in the USS 6-Stand and 2-Stand Mills (Idled) and Indiana Harbor West No. 2 Galvanizing Temper Mill; USS alkaline cleaning operations/ hot-dip galvanizing operations from Indiana Harbor No. 2 galvanizing line; and USS tin and chromium line electroplating operations (idled).

The Central Treatment Plant uses flotation, flocculation, sedimentation, chemical precipitation, coagulation, and neutralization to treat wastewater which is then discharged via Outfalls #101 and #001. Sludges are removed via centrifuge and hauled for disposal as hazardous waste (F006). The Central Treatment Plant is classified as a Class D industrial wastewater treatment plant. All Central Treatment Plant storm water is discharged through NPDES permitted outfalls before reaching the Indiana Harbor Ship Canal. Berms and grading have been constructed to prevent any runoff from going directly into Lake Michigan or the Indiana Harbor Ship Canal.

3.3 Drainage Area SWA-3

3.3.1 Former Hot Strip Mill

The main slab storage area is located in SWA-3 and has little or no contact with storm water.

Outdoor storage has been identified in the drawings section for coils, slabs, parts, and equipment.

3.4 Drainage Area SWA-4

3.4.1 **Finishing Storage** utilizes outdoor storage areas of steel coils, parts and equipment. Outdoor storage areas of chemicals or oils have secondary containment. The SPCC Plan has loading and unloading procedures that serve as Best Management Practices and must be followed to prevent and manage leaks and spills at these locations.

All water discharges in this area flow through the plant's process sewers to the North Storm-water Lagoon.

There are storm sewer manholes in the Finishing area, which discharge directly to North Storm-water Lagoon. Best Management Practices have been developed to prevent pollutants from flowing into these sewers.

3.4.2 West Coating

The coating facilities at Indiana Harbor West are located off Riley Road and produce coated products primarily for the automotive and appliance industry. West Coating receives coils from multiple locations on both the West and East sides of Indiana Harbor, including the pickle line, tandem mill, and temper mill. All processing, maintenance, and storage areas of West Coating are located indoors. West Coating contains one outdoor storage tank that contains diesel fuel. The SPCC Plan has loading and unloading

procedures that serve as Best Management Practices and must be followed to prevent and manage leaks and spills at this location.

All water discharges in this area flow through the plant's process sewers to the Central Treatment Plant, where it is treated and then discharged via NPDES Outfall #001.

There are storm sewer manholes in the Coating area, which discharge directly to a non-process NPDES Outfall #002. Best Management Practices have been developed to prevent pollutants from flowing into these sewers.

3.5 Drainage Area SWA-5

3.5.1 Phoenix Services

Phoenix Services processes slag from Indiana Harbor West. Slag is produced at the BOF and Blast furnaces. Processing occurs outdoors, and includes transporting slag from the furnaces, and crushing and screening various sized slag material and storage. Fugitive dust is generated from storage piles, loading and unloading operations, and vehicle traffic on roadways. Phoenix Services has a Title V Operating Permit and Fugitive Dust Plan. To minimize exposure to storm water, roads are swept and sprayed to control fugitive dust.

Phoenix Services provides material transfer services as needed throughout Indiana Harbor West. They maintain and operate a fleet of trucks and heavy equipment necessary for this service.

All outdoor storage areas of chemicals or oils have secondary containment. Phoenix Services uses their SPCC Plan as a Best Management Practice which must be followed to prevent and manage leaks and spills at these locations.

3.6 General and Interior Drainage Areas

All general and interior drainage areas listed discharge process and storm water into the process and storm sewers, respectively. No effluents from the areas listed below are discharged to waters of the state.

3.6.1 Logistics

Logistics is responsible for movement of materials and roadway maintenance through the Indiana Harbor West facility. Specific activities include responsibility for road paving, and ensuring the continuity of road berms and swales to prevent storm water erosion and runoff.

Logistics is responsible for all snow plowing, salt application, and herbicide application activities for the facility. During a regular snowfall event, snow is piled on the southwest corner of the Terminal Lagoon. When the snow melts, it is drained into the lagoon, and is

treated before discharging through NPDES Outfall #011. Salt storage is contained indoors, near the center of the plant and out of the pathway of any precipitation. Herbicides are applied all throughout the plant. Berms are constructed all around the plant and waterside roadways are graded away from the water, in order to prevent runoff. Many of the management activities conducted by Logistics are directly related to the prevention of storm water runoff from the Indiana Harbor West facility.

3.6.2 Environmental Department

The Environmental Department is responsible for maintaining compliance with Indiana Harbor West's environmental requirements. This includes the SPCC and RCRA Contingency Plan. The SPCC Plan and RCRA Contingency Plan are existing plans under the control of the Environmental Department and are incorporated by reference. The Environmental Department performs environmental training and inspections as required.

The Environmental Department will retain the SWPPP at the facility for review by a representative of the Commissioner upon request. The SWPPP will be revised and updated as required.

The Environmental Department reviews and approves chemicals and materials used at Indiana Harbor West. Safety Data Sheets are available on the Indiana Harbor Intranet.

NPDES monitoring reports are saved in the Environmental File System. Monitoring data field sheets, chain of custody forms, and laboratory results are kept according to the Environmental Department records retention schedule that provides the storage location.

Additionally, the Environmental Department manages the fugitive dust control program by spraying and sweeping the roads per Title V permit requirements.

3.6.3 Phoenix BF Slag

Phoenix provides screening of blast furnace slag for Indiana Harbor West. The entire facility is outdoors. Phoenix has outdoor storage areas for these materials. Fugitive dust is generated from storage piles, loading and unloading operations, and vehicle traffic on roadways. All roads are swept and sprayed to control fugitive dust.

All outdoor storage areas of chemicals or oils have secondary containment. Phoenix follows the SPCC Plan loading and unloading procedures which serve as Best Management Practices and must be followed to prevent and manage leaks and spills at these locations.

3.6.4 Oil Technology

Oil Technology processes oily wastewater and concentrated used oil for offsite recycle. Used oil is shipped offsite for recycle. All processing is conducted in enclosed tanks. Also located at the Oil Technology facility is a used oil drum storage area. The used oil drum storage area is within secondary containment to prevent release of oils, oily wastewater, or storm water that falls within the containment. Any oily water collected from all facility-wide secondary containment areas are processed by Oil Technology prior to discharge to the treatment plants.

3.7 Non-Storm Water Discharges [Part I.D.4.i]

The Storm Water Pollution Prevention Plan identifies non-storm water discharges that may exist at the facility. Non-storm water discharges are not allowed under Indiana's NPDES storm water regulation with few exceptions. Outfalls 002, 009, 010, and 011, have been evaluated for the presence of non-storm water discharges. Authorized discharges from these outfalls are listed in the NPDES permit as well as in section 4.10 of the SWPPP. A review of plant operations was conducted on September 26, 2024 to ensure that no non-permitted discharges into these outfalls exist. A certification letter stating such is included in Section 8 of this SWPPP.

All interior maintenance area floor drains are connected to the process sewer lines throughout the facility which direct all flow through treatment facilities before being discharged to waters of the state or recycled through the facility.

Please note that miscellaneous water discharges from daily road cleaning may enter some of the process sewers, where it would undergo treatment. The constituents in this road flushing water are not expected to vary from the constituents already permitted for per the NPDES permit.

Groundwater leaving the plant is monitored via a series of wells under the plant's USEPA 3013 assessment program.

3.8 Materials Inventory [Part I.E.2.b.(3).(N)]

A materials inventory of each area was conducted, to identify the location of materials that may have been or are exposed to storm water. The inventory includes significant materials used, handled, treated, stored, or disposed in a manner that may potentially have allowed exposure to storm water and, thus, added pollutants to storm water.

The following information has been gathered for Indiana Harbor West and is presented in tabular form by department in Table 4 of this SWPPP:

- Name of the material
- Use of the material
- Quantity of material used, produced, or stored
- Method of storage

- Possibility of contact with storm water
- Description of material management practices

Material inventory information will be updated whenever new materials are handled, used, stored, treated, or disposed of and when existing materials are no longer used at the facility. Specific materials and materials handling and storage areas are shown in the drawings section.

4 STORM WATER CONTROL MEASURES [Part I.D.4]

The pollutant source assessment and appropriate storm water management controls that have been implemented with each department are presented in the following tables:

- Table 4 – Materials Inventory
- Table 5 – Significant Leaks and Spills

The control measures and BMPs that have been selected, designed, installed, and implemented are in accordance with good engineering practices. These control measures and BMPs are broad ranging and include processes, procedures and structural controls. The BMPs incorporate the extensive use of engineering controls to reduce or eliminate the quantity and impacts of storm water discharge from the facility. The effectiveness of BMPs are evaluated on a periodic basis and modified in the SWPPP as an ongoing process of continuous improvement.

4.1 Minimize Exposure [Part I.D.4.a]

Indiana Harbor West will minimize the exposure of industrial materials and activities to rain, snow, snowmelt, and runoff. To the extent technologically available and economically practicable and achievable, either locate industrial materials and activities inside or protect them with coverings (e.g. sprayed on coating to minimize fugitive emissions and material runoff in order to minimize exposure to rain, snow, snowmelt, and runoff. In minimizing exposure, Indiana Harbor West pays particular attention to the following areas:

- Loading and Unloading Areas – Loading and unloading activities are located in areas to prevent storm water runoff through the use of grading, berming, or curbing around the loading area to divert run-on and prevent runoff. Loading and unloading vehicles and equipment are located so that leaks are contained in existing containment and flow diversion systems.
- Material Storage Areas – Material storage areas are located in areas to prevent storm water runoff through the use of grading, berming, or curbing around the loading area to diver run-on and prevent runoff.

4.2 Good Housekeeping [Part I.D.4.b]

Indiana Harbor West maintains exposed areas that are potential sources of pollutants, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers.

Indiana Harbor West practices good housekeeping throughout the facility through a number of activities:

- Cleaning and maintenance activities for impervious areas of the facility where particulate matter, dust, or debris may accumulate. Areas where material loading and unloading, storage, handling, and processing occur are graded or maintained to prevent storm water runoff;
- Materials are kept orderly, labeled, and contained in appropriate containers.
- Ensure that waste, garbage, and floatable debris are not discharged to receiving waters, by keeping exposed areas free of floatable materials.
- Indiana Harbor West employs a very robust road sweeping and spraying program, to minimize generation of dust and vehicle tracking of industrial materials.

4.3 Maintenance [Part I.D.4.c]

Indiana Harbor West actively operates and maintains a number of control measures to achieve the effluent limits required by the NPDES Permit. Nonstructural control measures including spill response and employee training are implemented. If control measures need to be replaced or repaired, the necessary repairs or modifications are completed to reduce the impacts from storm water runoff. Secondary containment areas for outdoor storage tanks are kept free of debris and spilled materials and storm water. Indiana Harbor West employs Preventative Maintenance Plans, including maintaining equipment and vehicles in order to prevent fluid leaks.

4.4 Spill Prevention and Response [Part I.D.4.d]

Indiana Harbor West minimizes the potential for leaks, spills and other releases that may be exposed to storm water and has developed a Spill Prevention, Control and Countermeasure (SPCC) Plan and multiple Hazardous Waste Contingency Plans (RCRA and INDOT) for effective response to such spills when they occur. The plans contain the following elements that have been implemented:

- Container labeling to identify materials that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur;
- Implementation of preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling;
- Response procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases. Employees who may cause, detect or respond to a spill or leak are trained in these procedures and have necessary spill response equipment available.
- Procedures for notification of appropriate personnel, emergency response agencies, and regulatory agencies. Contact information must be in locations that are readily accessible and available.
- Procedures for documenting where potential spills and leaks could occur that could contribute pollutants to storm water discharges, and the corresponding outfalls that would be affected by such spills and leaks;

- Procedures for documenting all significant spills and leaks of oil or other materials that have occurred at the facility and may be drained to a storm water conveyance.

4.5 Erosion and Sediment Controls [Part I.D.4.e]

Indiana Harbor West has implemented the use of structural and non-structural control measures to stabilize, and contain runoff from exposed areas to minimize onsite erosion and prevent the discharge of pollutants. Indiana Harbor West has implemented the use of storm water collection basins to reduce erosion or settle out pollutants.

4.6 Management of Runoff [Part I.D.4.f]

Indiana Harbor West has implemented actions to reduce storm water runoff to minimize pollutants in the discharge through the use of berms and road-grading.

4.7 Salt Storage Piles or Piles Containing Salt [Part I.D.4.g]

The facility's salt storage is contained indoors-near the center of the plant.

4.8 Employee Training [Part I.D.4.h]

Indiana Harbor West trains all employees who work in areas where industrial material or activities are exposed to storm water, or who are responsible for implementing activities necessary to meet the conditions of the NPDES permit (e.g., inspectors, maintenance personnel), including all members of the Pollution Prevention Team. Training covers the specific control measures used to achieve the effluent limits, monitoring, inspection, planning, reporting, and documentation requirements. Employees are also trained to be knowledgeable of SPCC and RCRA requirements and procedures. This training is part of mandatory orientation and onboarding for all new employees at Indiana Harbor.

4.9 Non-Storm water Discharge [Part I.D.4.i]

Indiana Harbor West has assessed and documented all non-storm water discharges including any non-storm water discharges not authorized by the NPDES permit. A certification letter stating such is included in Section 8 of this SWPPP. The following non-storm water discharges are authorized and will be documented when they occur:

- Discharges from fire-fighting activities;
- Fire hydrant flushing;
- Potable water, including water line flushing;
- Condensate from air conditioners, coolers, and other compressors and from the outside storage of refrigerated gases or liquids;
- Irrigation drainage;
- Landscape watering provided all pesticides, herbicides, and fertilizer have been applied in accordance with approved labeling;

- Pavement wash water where no detergents are used and no spills or leaks of toxins or hazardous material have occurred (unless all spilled material has been removed);
- Routine external building wash down that does not use detergents;
- Ground water or spring water;
- Foundation or footing drains where flows are not contaminated with process materials;
- Incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of the facility, but not intentional discharges from cooling towers (e.g. piped cooling tower blowdown or drains);
- Vehicle wash- waters where detergents or solvents are not utilized.

All interior maintenance area floor drains are connected to the process sewer lines throughout the facility which direct all flow through treatment facilities before being discharged to waters of the state or recycled through the facility.

Please note that miscellaneous water discharges from daily road cleaning may enter some of the process sewers, where it would undergo treatment. The constituents in this road flushing water are not expected to vary from the constituents already permitted for per the NPDES permit.

Groundwater leaving the plant is monitored via a series of wells under the plant's USEPA 3013 program.

4.10 *Dust Generation and Vehicle Tracking of Industrial Material [Part I.D.4.j]*

Indiana Harbor West minimizes the generation of dust and off-site tracking of industrial materials as described in the Indiana Harbor Fugitive Dust Plan. The plan can be found in the Environmental Files.

5 PROCEDURES FOR INSPECTIONS AND MONITORING [Part I.D.5-9]

5.1 *Annual SWPPP Review [Part I.D.5]*

Every twelve (12) months, Indiana Harbor West will review the selection, design, installation, and implementation of the control measures to determine if modifications are necessary to meet the effluent limitations described in the NPDES permit. The results of the annual review will be documented in a report and retained with the Storm Water Pollution Prevention Plan as required by Section D.5 of the current NPDES permit.

5.2 *Quarterly Inspection of Storm Water Management Measures [Part I.D.9.a-c]*

The facility is excluded from the requirement to conduct quarterly visual assessments because all outfalls are described to be characterized by flows of non-contact cooling water and/or process water that are substantially greater than the dry weather stormwater contribution. Per the NPDES permit, Section D.10, quarterly inspections of storm water management measured and storm water runoff conveyances are required. These quarterly inspections will be conducted by qualified personnel with at least one member of the storm water pollution prevention team. Indiana Harbor West will document the findings of each routine quarterly inspection performed and will maintain this documentation in accordance with Indiana Harbor record keeping requirements. The storm water maintenance inspection form is referenced in the maintenance inspection tab in the SWPPP. The quarterly inspection form contains the following information:

- Inspection date and time
- Name(s) and signature(s) of the inspector(s)
- Weather information and a description of any discharges occurring at the time of the inspection;
- Any previously unidentified discharges of pollutants from the site
- Any control measures needing maintenance or repairs
- Any failed control measures that need replacement
- Any incidents of non-compliance observed
- Any additional control measures needed to comply with the permit requirements
- Documentation of Corrective Actions

5.3 *Corrective Actions – Conditions Requiring Review [Part I.D.6-8]*

If any of the following conditions occur, the control measures or BMPs will be reviewed and revised if necessary, to ensure that the condition is eliminated and will not be repeated.

- An unauthorized release or discharge (e.g., spill, leak, or discharge of non-storm water not authorized by this NPDES permit) occurs at the facility.
- It is determined that the control measures are not stringent enough for the discharge to meet applicable water quality standards.
- It is determined that modifications to the control measures are necessary to meet the effluent limits in the NPDES permit or that the control measures are not being properly operated and maintained.
- Upon written notice by the Commissioner that the control measures prove to be ineffective in controlling pollutants in storm water discharges exposed to industrial activity.
- Construction or a change in design, operation or maintenance at the facility that significantly changes the nature of pollutants discharged in storm water from the facility, or significantly increases the quantity of pollutants discharged.

As stipulated in the NPDES permit section D.8, within 24 hours of a discovery of any condition listed in this section, the following information is documented:

- Brief description of the condition triggering corrective action
- Date condition was identified
- How the deficiency was identified

Also stipulated, within 30 days of discovery of any condition listed in this section, the following information is documented:

- Summary of corrective action taken or to be taken. Where you determine that corrective action is not necessary, the basis for this determination
- Notice of whether SWPPP modifications are required as a result of the discovery or corrective action
- Date corrective action initiated
- Date corrective action completed or expected to be completed

5.4 *Plan Revisions* [Part I.E.1]

If the site evaluation identifies changes at the facility that have a significant effect on the potential for the discharge of pollutants to surface waters, the SWPPP will be amended. These changes may include construction activity or changes in operations or maintenance. In addition, modifications to the SWPPP which improve the effectiveness of the plan will also be included. The SWPPP will be revised where needed, and revisions will be noted.

The Indiana Harbor Environmental Department will have the responsibility for revising the SWPPP so that it reflects current conditions at the facility, for documenting these revisions to reflect Indiana Harbor West's efforts to control pollution from storm water runoff.

5.5 Spill Prevention and Response Program [Part I.D.4.d]

The Indiana Harbor West Spill Prevention Control and Countermeasures (SPCC) Plan is incorporated by reference into this SWPPP as required by the Cleveland-Cliffs Steel LLC Indiana Harbor West NPDES permit. The SPCC Plan has loading and unloading procedures that serve as BMPs and will be followed to prevent and manage leaks and spills at locations throughout the facility.

6 TABLE 1 – OUTFALL LOCATIONS AND DRAINAGE AREAS Including the North Storm-water Lagoon [Part I.E.2.b.(3)]

Outfall Designation	Latitude (N)	Longitude (W)	Related Drainage Area
External Outfalls			
002	41° 39' 19.22"	87° 27' 36.03"	West Coating (Leased Property)
009	41° 39' 40.77"	87° 27' 05.91"	SWA-1
010	41° 39' 40.92"	87° 27' 05.70"	SWA-1
011	41° 40' 21.97"	87° 26' 32.70"	SWA-2
Internal Outfalls			
509	41° 39' 46.04"	87° 27' 14.15"	SWA-1
701	41° 40' 16.74"	87° 26' 51.13"	SWA-2
702	41° 40' 18.34"	87° 27' 12.94"	SWA-2

7 TABLE 2 – IMPERVIOUS SURFACES [Part I.E.2.b.(3)]


Description	Area [sq. ft.]	Area [acres]
Buildings	6,631,897	152.2
Paved Roads	3,535,527	81.2
Landfill Membrane Cover	1,702,891	39.1
<i>Impervious Total</i>	<i>11,870,325</i>	<i>272.5</i>
<i>Pervious total</i>	<i>38,680,000</i>	<i>888</i>
Total IH West Facility	50,550,000	1160.4

8 TABLE 3 – NON-STORM WATER DISCHARGE ASSESSMENT AND CERTIFICATION [Part I.E.2.c]

All outfalls at the Plant (Outfalls 001, 002, 009, 010, 011) contain discharges other than storm water as authorized by NPDES Permit No. IN0000205 and No. IN0063711. Authorized discharges from these outfalls are listed in the NPDES permit and in Section 4.9 of this SWPPP. An evaluation has been conducted to ensure that no unauthorized discharges from these outfalls exist. A summary of the evaluations are provided below.

TABLE 3- NON-STORM WATER DISCHARGE ASSESSMENT AND CERTIFICATION					
Date of Test Or Evaluation	Drainage area directly observed during the test	Method used to Test or Evaluate Discharge	Describe results from test for the presence of Non-Storm Water Discharge	Identify Potential Significant Sources	Name of person who conducted test or evaluation
September 26, 2024	SW – 1	Dry Weather Observation	No non-storm water discharges identified	Scrap metal and slag storage area on the west side of Dock No. 7	Kevin Lurtz
September 26, 2024	SW – 2	Dry Weather Observation	No non-storm water discharges identified	Iron Ore and Scale storage area on the west side of Dock No. 7	Kevin Lurtz
September 26, 2024	SW – 3	Dry Weather Observation	No non-storm water discharges identified	Limestone and slag storage area on the east side of Dock No. 6	Kevin Lurtz
September 26, 2024	SW – 4	Dry Weather Observation	No non-storm water discharges identified	Material storage and handling along perimeter road and limestone conveyor belt north of Dock No. 5	Kevin Lurtz
September 26, 2024	SW – 5	Dry Weather Observation	No non-storm water discharges identified	Material storage and handling along perimeter road east of Dock No. 4 and limestone storage area north of the Turning Basin	Kevin Lurtz

TABLE 3- NON-STORM WATER DISCHARGE ASSESSMENT AND CERTIFICATION

Date of Test Or Evaluation	Drainage area directly observed during the test	Method used to Test or Evaluate Discharge	Describe results from test for the presence of Non-Storm Water Discharge	Identify Potential Significant Sources	Name of person who conducted test or evaluation
Certification					
<p>I, _____ (responsible corporate official), 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. Further, I certify that no detergent washing of vehicles or equipment occurs at this facility and that all maintenance area floor drains are connected to process and sanitary sewer lines that are treated prior to discharge. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</p>					
A. Name & Official Title Thomas Barnett Manager ENV			B. Area Code and Telephone No. 219-399-2380		
C. Signature 			D. Date Signed 12/11/2024		

9 TABLE 4 – MATERIALS INVENTORY [Part I.E.2.b.(3).(N)]

9.1 Table 4.1 – SWA – 1 – Ironmaking _(IDLED)

Instructions: List all materials used, stored, or produced on site that have a potential to contribute pollutants to storm water runoff or have been exposed to storm water.					
Material	Purpose	Quantity [Units]	Method of Storage	Possibility of contact with storm water discharge. If yes, describe reason.	Describe Material Management Practice (e.g. covered, bermed, drummed)
Iron Ore	Raw Material	1,000,000 tons	Pile	Unlikely due to grading	Area graded to prevent runoff.
Coke	Raw Material	1,000,000 tons	Pile	Unlikely due to grading	Area graded to prevent runoff.
Flux	Raw Material	1,000,000 tons	Pile	Unlikely due to grading	Area graded to prevent runoff.
Scale	Revert	50,000 tons	Pile	Unlikely due to grading	Area graded to prevent runoff.
Clean-up Materials	Revert	25,000 tons	Pile	Unlikely due to grading	Area graded to prevent runoff.
Pellet & Sinter Fines	Revert	25,000 tons	Pile	Unlikely due to grading	Area graded to prevent runoff.
Flue Dust	Revert	50,000 tons	Pile	Unlikely due to grading	Area graded to prevent runoff.
BF Recycle Filter Cake	Revert/Waste	10,000 tons	Pile	Unlikely due to grading	Area graded to prevent runoff.
Blast Furnace Brick	Waste	10,000 tons	Pile	Unlikely due to grading	Area graded to prevent runoff.
Baghouse dust	Waste	2,000 tons	Pile	Unlikely due to operating procedures	BMP operating procedures to prevent dust spillage.
Fuel and Oil Tanks	Storage	100,000 gallons	Tank	Unlikely due to secondary containment	Tanks are enclosed and adhere to Indiana Harbor West SPCC Plan.

9.2 Table 4.2 – SWA – 2 - Steelmaking

Instructions: List all materials used, stored, or produced on site that have a potential to contribute pollutants to storm water runoff or have been exposed to storm water.					
Material	Purpose	Quantity [Units]	Method of Storage	Possibility of contact with storm water discharge. If yes, describe reason.	Describe Material Management Practice (e.g. covered, bermed, drummed)
Steel Slabs	Storage	500,000 tons	On Ground	Unlikely due to berms	Area is bermed to prevent direct runoff into receiving waters.
Baghouse Dust	Waste	10,000 tons	On Ground or in bags	Unlikely due to operating procedures	BMP operating procedures to prevent dust spillage
Fuel and Oil Tanks	Storage	500 gallons	Tank	Unlikely due to secondary containment	Tanks are enclosed and adhere to Indiana Harbor West SPCC Plan.
Treatment Plant Sludge	Waste	10,000 tons	Pile	Unlikely due to berms	Area bermed to prevent direct runoff into receiving waters.
BF and BOF slag	Byproduct	1.2 million tons	Pile	Unlikely due to berms	Area bermed to prevent direct runoff into receiving waters.

9.3 Table 4.3 – SWA - 3

Instructions: List all materials used, stored, or produced on site that have a potential to contribute pollutants to storm water runoff or have been exposed to storm water.					
Material	Purpose	Quantity [Units]	Method of Storage	Possibility of contact with storm water discharge. If yes, describe reason.	Describe Material Management Practice (e.g. covered, bermed, drummed)
Fuel and Oil Tanks	Storage	500 gallons	Tank	Unlikely due to secondary containment	Tanks are enclosed and adhere to Indiana Harbor West SPCC Plan.
Slab Storage	Final Product	500,000 tons	On Ground	Unlikely due to berms and grading	Plant perimeter berms and grading.

9.4 Table 4.4 – SWA - 4

Instructions: List all materials used, stored, or produced on site that have a potential to contribute pollutants to storm water runoff or have been exposed to storm water.					
Material	Purpose	Quantity [Units]	Method of Storage	Possibility of contact with storm water discharge. If yes, describe reason.	Describe Material Management Practice (e.g. covered, bermed, drummed)
Coil Storage	Storage	500 tons	On ground	Unlikely due to berms and grading	Plant perimeter berms and grading.

9.5 Table 4.5 – SWA - 5

Instructions: List all materials used, stored, or produced on site that have a potential to contribute pollutants to storm water runoff or have been exposed to storm water.					
Material	Purpose	Quantity [Units]	Method of Storage	Possibility of contact with storm water discharge. If yes, describe reason.	Describe Material Management Practice (e.g. covered, bermed, drummed)
Oil and Fuel Tanks	Storage	500 gallons	Tank	Unlikely due to secondary containment	Tanks are enclosed and adhere to Indiana Harbor West SPCC Plan.
Slag Fines	Storage	1,000,000 tons	Pile	Unlikely due to berms and dust control	Sweeping and spraying is conducted to control fugitive dust.
Iron Fines and Scrap	Storage	100,000 tons	Pile	Unlikely due to berms and dust control	Sweeping and spraying is conducted to control fugitive dust.
Steel Fines and Scrap	Storage	1,000,000 tons	Pile	Unlikely due to berms and dust control	Sweeping and spraying is conducted to control fugitive dust.

10 TABLE 5 – SIGNIFICANT SPILLS AND LEAKS [Part I.E.2.b.(3).(H)]

10.1 Table 5.1 – SWA - 1

Directions: Record below all material spilled outside of secondary containment structures and impervious surfaces in excess of their reportable quantities.				
Spill Date	Location	Release Information		Remedial Actions
		Material Released	Amount Spilled	Description of the remedial actions undertaken, including disposal or treatment.
2024				
2023				
2022				
2021				
2020				

10.2 Table 5.2 – SWA - 2

Directions: Record below all material spilled outside of secondary containment structures and impervious surfaces in excess of their reportable quantities.				
Spill Date	Location	Release Information		Remedial Actions
		Material Released	Amount Spilled	Description of the remedial actions undertaken, including disposal or treatment.
2024				
2023				
2022				
2021				
2020				

10.3 Table 5.3 – SWA - 3

Directions: Record below all material spilled outside of secondary containment structures and impervious surfaces in excess of their reportable quantities.				
Spill Date	Location	Release Information		Remedial Actions
		Material Released	Amount Spilled	Description of the remedial actions undertaken, including disposal or treatment.
2024				
2023				
2022				
2021				
2020				

10.4 Table 5.4 – SWA - 4

Directions: Record below all material spilled outside of secondary containment structures and impervious surfaces in excess of their reportable quantities.				
Spill Date	Location	Release Information		Remedial Actions
		Material Released	Amount Spilled	Description of the remedial actions undertaken, including disposal or treatment.
2024				
2023				
2022				
2021				
2020				

10.5 Table 5.5 – SWA - 5

Directions: Record below all material spilled outside of secondary containment structures and impervious surfaces in excess of their reportable quantities.				
Spill Date	Location	Release Information		Remedial Actions
		Material Released	Amount Spilled	Description of the remedial actions undertaken, including disposal or treatment.
2024				
2023				
2022				
2021				
2020				

11 TABLE 6 – PLANT PROCESS WATER/COOLING WATER MANAGEMENT SYSTEMS

NPDES OUTFALL	DEPARTMENTS THAT DISCHARGE TO THESE OUTFALLS	TYPE	MANAGEMENT EQUIPMENT & SYSTEMS
001	Central Treatment USS Tin, Chrome Line via CTP IH West Galvanizing Line.	External	Metals precipitation Coagulation Flocculation
002	AM West No. 2 Sheet Mill Galvanizing	External	N/A
101	Central Treatment USS Tin (idled), Chrome Line via CTP Six Stand Oil Recovery (idled)	Internal, discharges to 001	Clarifier Operation Metals Precipitation Sludge Dewatering Oil Recovery
009	Utilities Power House and Blast Furnace Process (idled) Water	External – Non Contact Cooling Water	N/A
010	Utilities Boiler House	External – Non Contact Cooling Water, BF Shell Cooling	N/A
011	Steel producing	External – BF and Steel producing process waters.	Gravity Filtration Oil Collection at Scale Pit
509	Blast Furnace (IDLED)	Internal, discharges to 009	Solid Settling Filtration Metals Precipitation
701	Steel Producing – LMF	Internal	Coagulation, Flocculation, Filtration and Clarifier Operation
702	Steel Producing – Caster	Internal	Carbon Filtration

12DRAWINGS [Part I.E.2.b.(1-3)]

Figure 1 – Topographic Map [Part I.E.2.b.(3)]

Figure 2 – Soils Map [Part I.E.2.b.(1)]

Figure 3 – Tank and Temporary Waste Storage Locations (Also see IHW SPCC) [Part I.E.2.b.(2).(C,J-K,P,S)]

Figure 4 – Storage Areas Map [Part I.E.2.b.(2).(C,F,L-O,Q,T)]

Figure 5 – Site Drainage Areas [Part I.E.2.b.(2).(C-E) and Part I.E.2.b.(3)]

Figure 6 – Storm and Process Sewers [Part I.E.2.b.(2).(A-C,I)]

Figure 7 – Fugitive Dust/Loading & Unloading Areas [Part I.E.2.b.(2)]

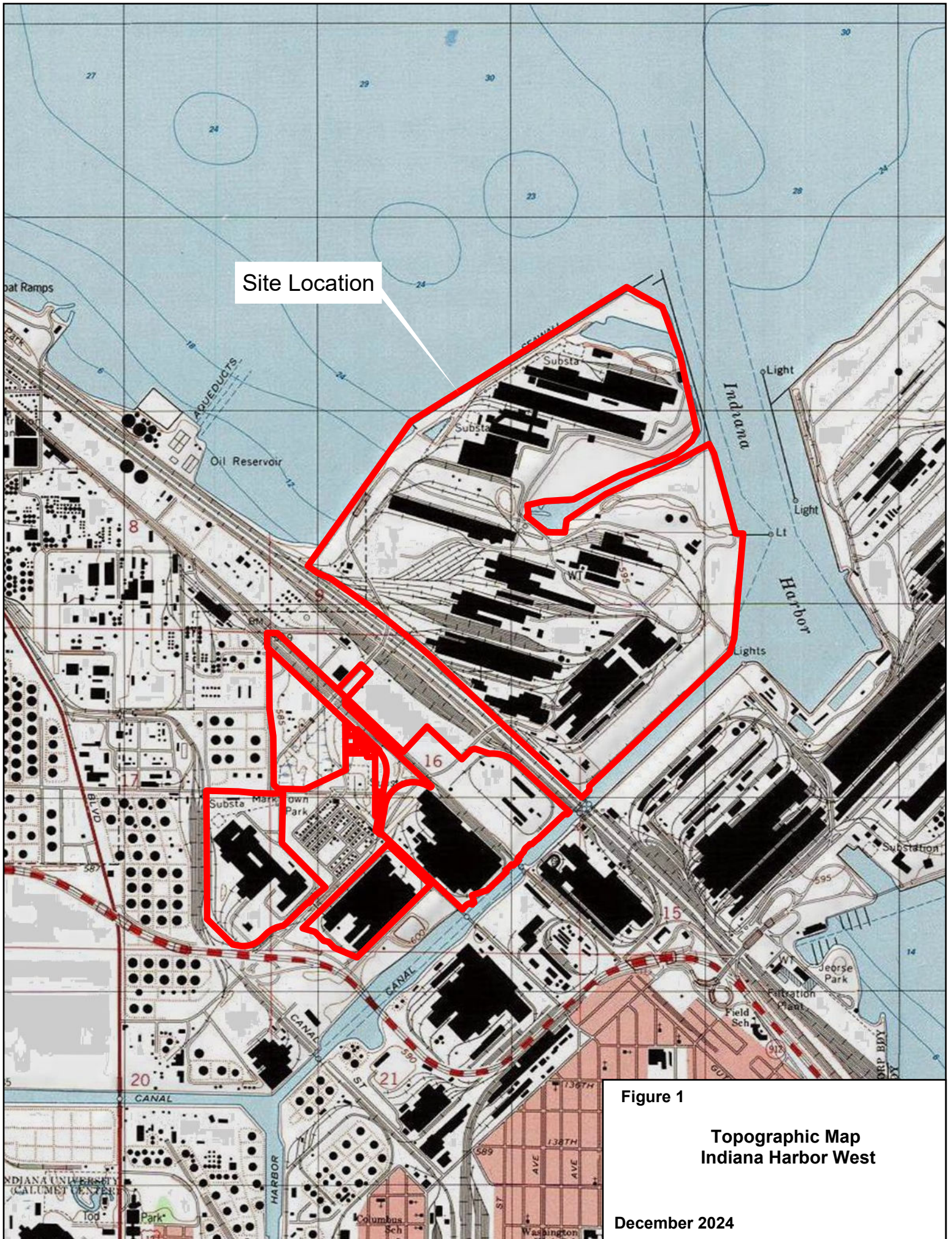


Figure 1

Topographic Map
Indiana Harbor West

December 2024

Path: C:\Users\janet.otoole\OneDrive - AECOM\GIS - ClevelandCliffs\ConvertPro\SWPPP\SWPPP.aprx

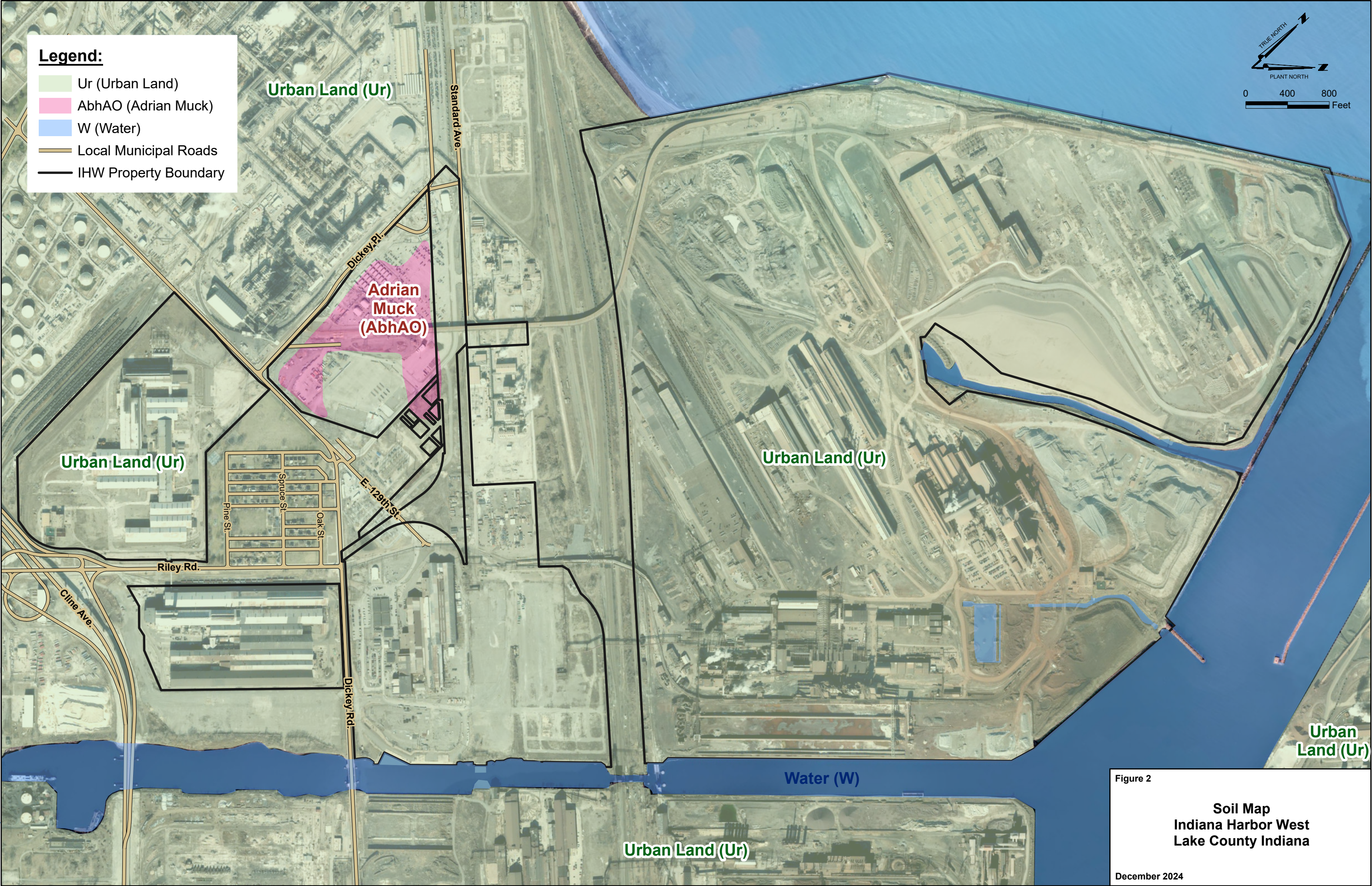






Figure 2

Soil Map
Indiana Harbor West
Lake County Indiana

December 2024

Legend:

- | | | | |
|---|-------------------------------|---|-----------------------|
| ★ | Active NPDES Outfall |  | Municipal Roads |
| ● | Tank |  | Plant Road |
| ● | Trash Dumpster |  | Rail |
| ● | Recycle Dumpster |  | IHW Property Boundary |
| ● | Wood/Trash Roll-off Box | | |
| ● | Industrial Waste Roll-off Box | | |
| ✱ | Bag House | | |
| ✱ | Snow Storage Area | | |

Lake Michigan

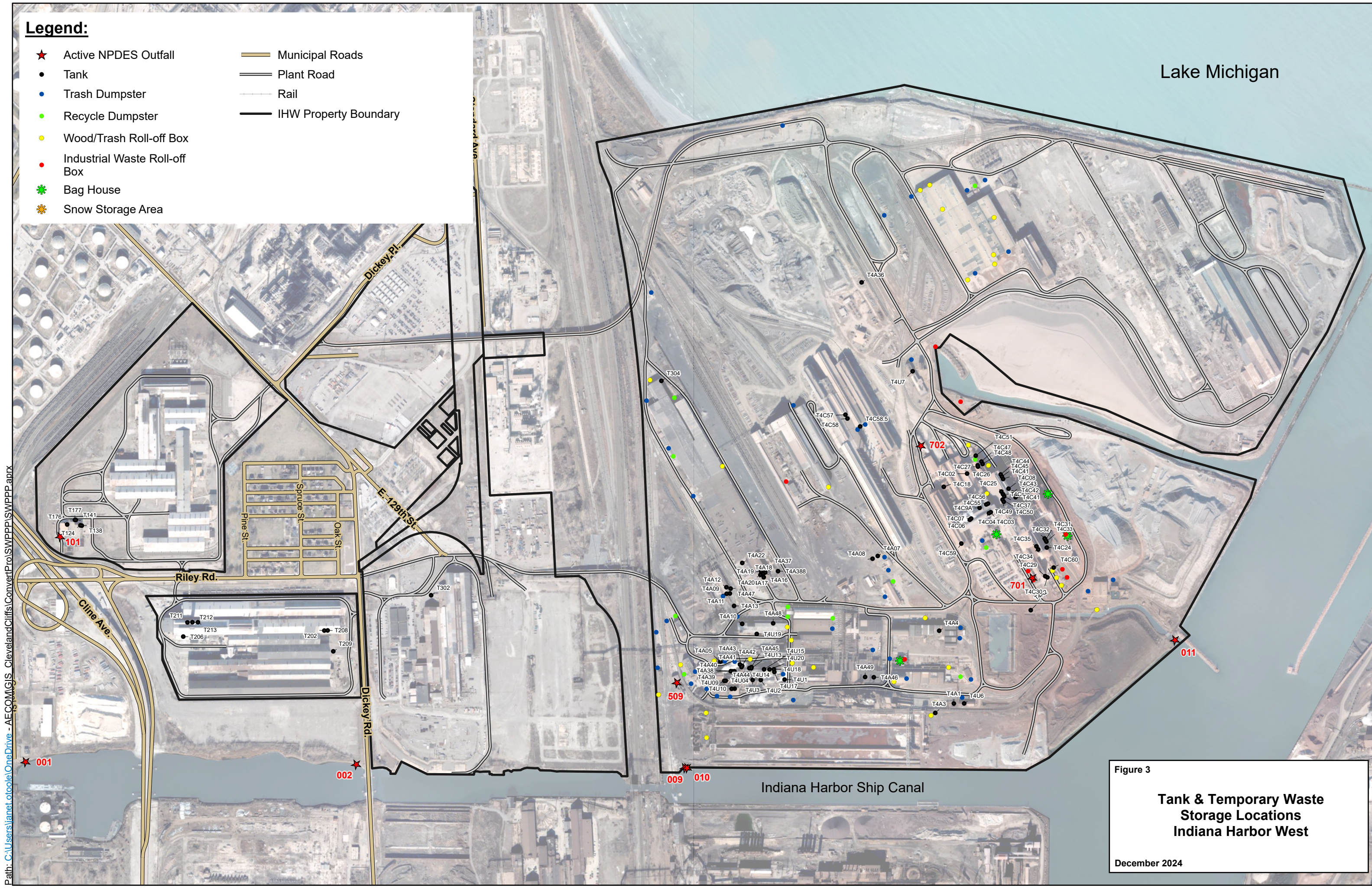
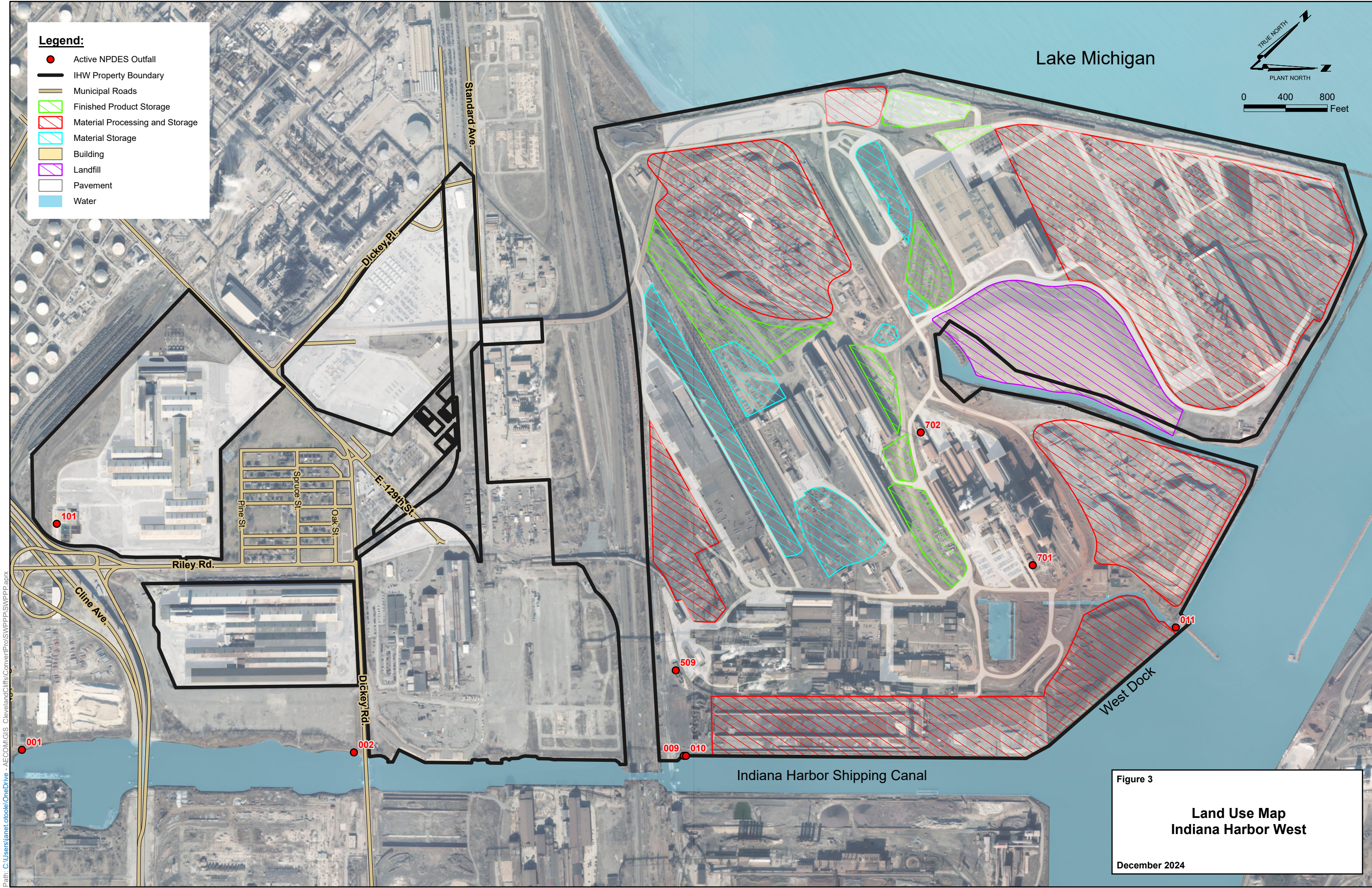
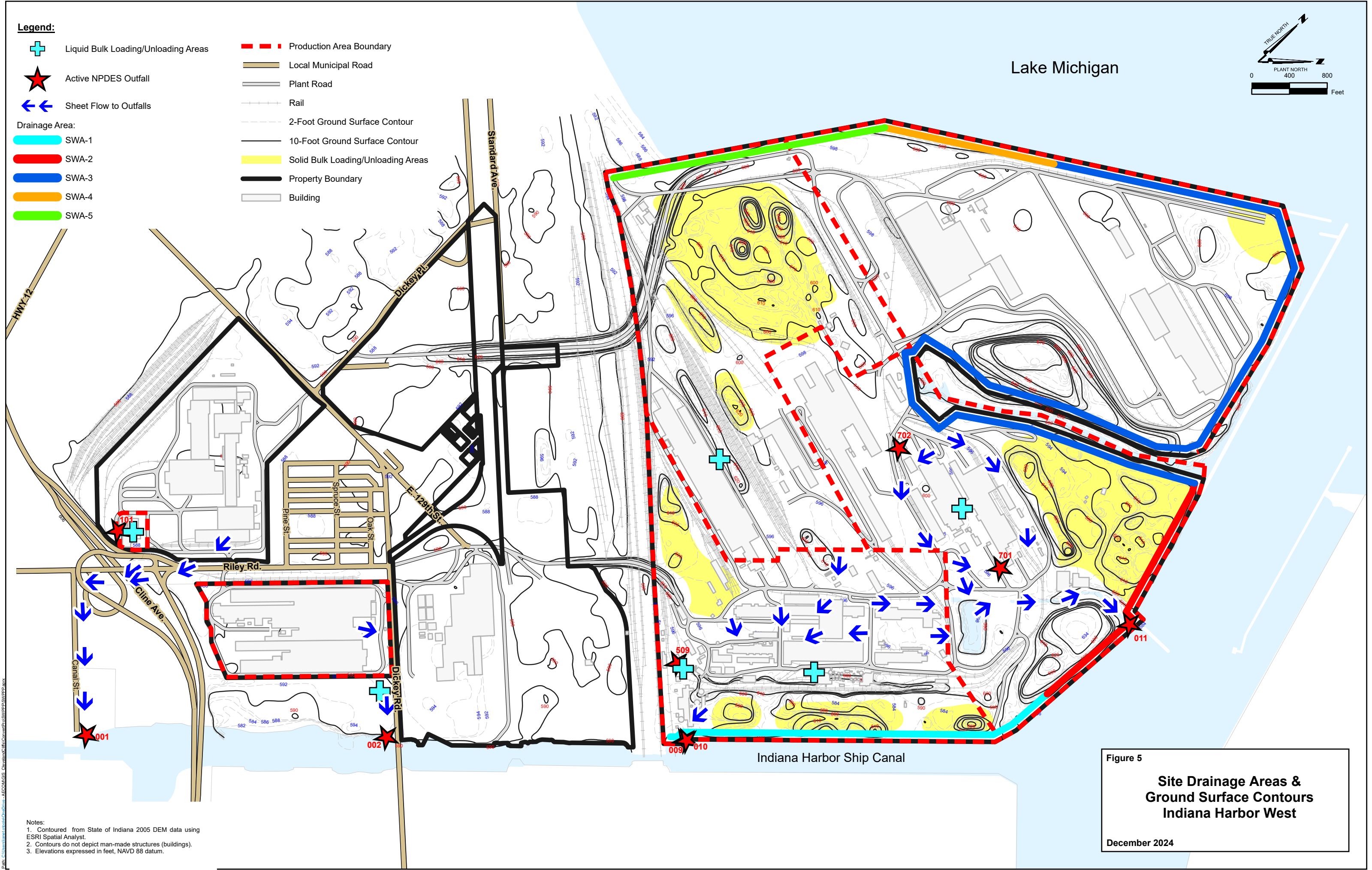


Figure 3

Tank & Temporary Waste Storage Locations Indiana Harbor West

December 2024

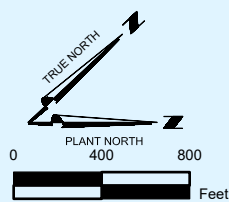




Legend:

- Liquid Bulk Loading/Unloading Areas
 - Active NPDES Outfall
 - Sheet Flow to Outfalls
 - Production Area Boundary
 - Local Municipal Road
 - Plant Road
 - Rail
 - 2-Foot Ground Surface Contour
 - 10-Foot Ground Surface Contour
 - Solid Bulk Loading/Unloading Areas
 - Property Boundary
 - Building
- Drainage Area:
- SWA-1
 - SWA-2
 - SWA-3
 - SWA-4
 - SWA-5

Lake Michigan



Notes:
1. Contoured from State of Indiana 2005 DEM data using ESRI Spatial Analyst.
2. Contours do not depict man-made structures (buildings).
3. Elevations expressed in feet, NAVD 88 datum.

Figure 5

Site Drainage Areas & Ground Surface Contours

Indiana Harbor West

December 2024

Legend:

- ★ Active NPDES Outfall
- ▶ Storm Sewer and Flow Direction
- ▶ Process Sewer and Flow Direction
- - - Production Area Boundary
- Property Boundary

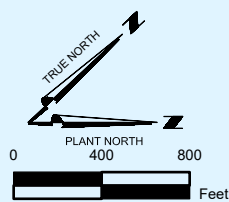


Figure 6

**Storm/Process Sewers &
Property Boundaries
Indiana Harbor West**

December 2024

Path: C:\Users\jason\OneDrive\Documents\AECOM\GIS_Cleveland\Illinois\Cover\BSP\BSP_NPPE.aprx

Legend:

- Active NPDES Outfall
- Fugitive Emissions Dust Loading/Unloading Area
- Municipal Roads
- IHW Property Boundary
- ▨ Landfill

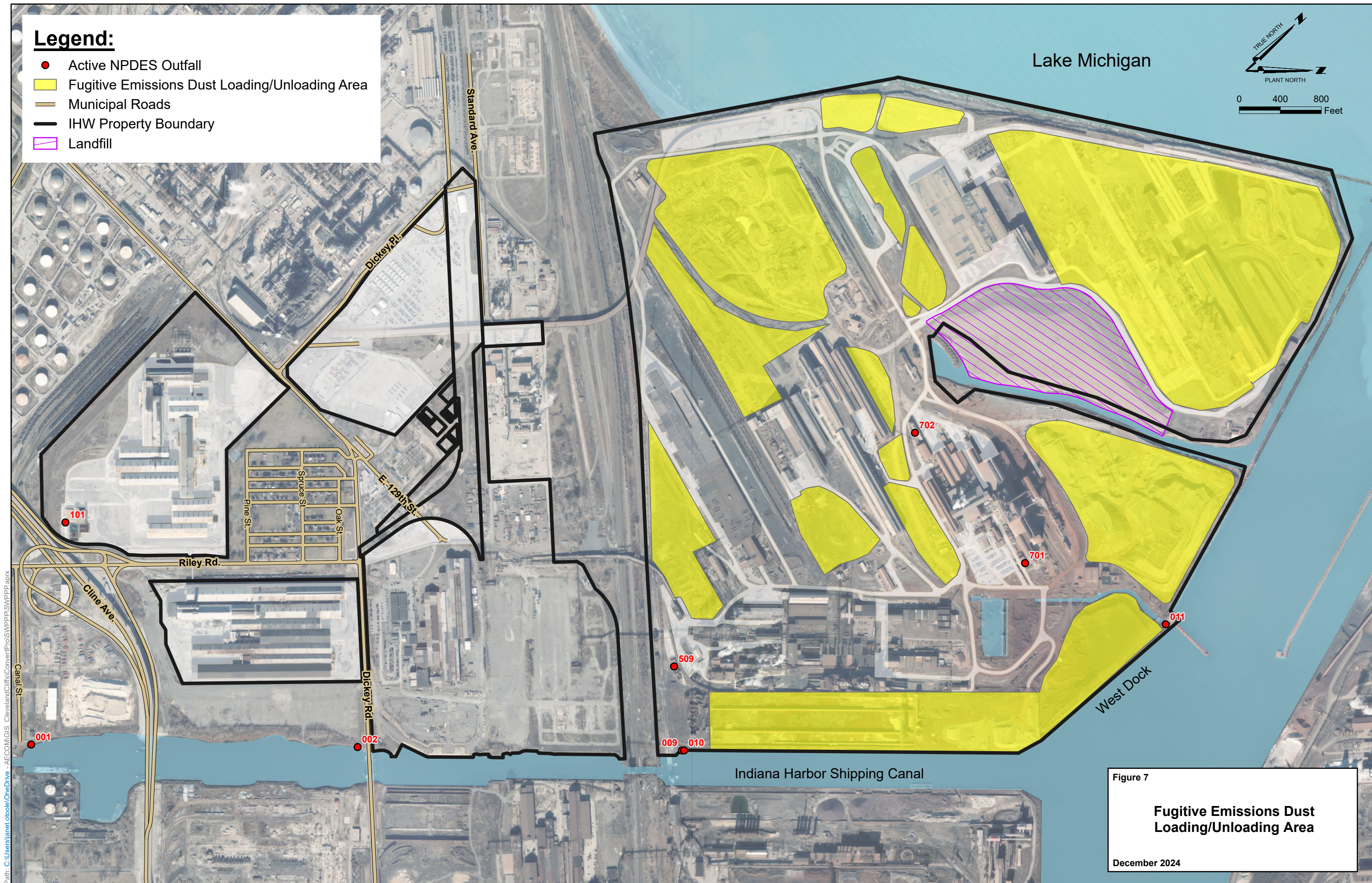
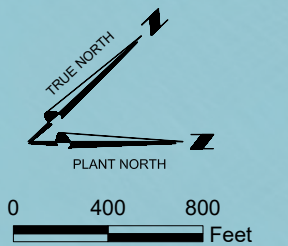


Figure 7

Fugitive Emissions Dust Loading/Unloading Area

December 2024

13 **DRAINAGE AREA MAINTENANCE INSPECTION FORMS [Part I.D.10]**

Quarterly Storm Water Inspection Report Form

This inspection form must be completed once every quarter and can be found on the Environmental website under the title:

ENV-F-63b_IHW_Quarterly_SWPPP_Inspection_Report_Form

USEPA Annual Reporting Form

This inspection form must be completed once every year.

Indiana Harbor uses the USEPA's Annual Reporting Form to record annual inspections.