



## Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

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(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Eric J. Holcomb**  
*Governor*

**Brian Rockensuess**  
*Commissioner*

April 05, 2024

Via Email to: [thomas.barnett@clevelandcliffs.com](mailto:thomas.barnett@clevelandcliffs.com)

Mr. Thomas Barnett, Environmental Manager  
Cleveland-Cliffs Indiana Harbor - West  
3001 Dickey Road  
East Chicago, Indiana 46312

Dear Mr. Barnett:

**Re: Inspection Summary/ Noncompliance Letter**  
Cleveland-Cliffs Indiana Harbor - West  
NPDES Permit No. IN0000205  
East Chicago, Lake County

An inspection of the above-referenced facility or location was conducted by a representative of the Indiana Department of Environmental Management, Southeast Regional Office, pursuant to IC 13-18-3-9. A summary of the inspection is provided below:

Date(s) of Inspection: April 01, 2024  
Type of Inspection: Reconnaissance Inspection  
Inspection Results: Violations were observed.

The following concerns were noted:

1. The Operation category was rated as unsatisfactory. Part II. B. 1. of the permit requires that all facilities and systems (and related appurtenances) for collection and treatment, which are installed or used by the permittee and which are necessary for achieving compliance with the terms and conditions of the permit in accordance with 327 IAC 5-2-8(8) must be maintained in good working order and efficiently operated at all times. On March 25, 2024, Cleveland-Cliffs personnel self-reported a bypass for Outfall 702 on March 22, 2024.

Due to infrequent usage, Cleveland-Cliffs personnel had, within the month prior to the bypass, sealed Outfall 702 at the flume to prevent discharges to, ultimately, Outfall 011. Subsequent to sealing the flume, the blast furnace had a 48 hour outage. Continuous Caster spray blowdown that would normally be discharged to the Basic Oxygen Furnace (BOF) Hood Spray Tank as part of a water reuse system, could not, as the line was not in operation. The water would have previously been discharged through Outfall 702. As the line had been plugged, water instead discharged from a sump in the Scale Pit in Building C and to storm water drains leading to the Terminal Lagoon and then to the Terminal Lagoon Wastewater Treatment

Plant. This would have been the permitted destination if Outfall 702 had discharged normally.

The bypass had undergone treatment within the Continuous Caster Wastewater Treatment plant, but bypassed around the now plugged Outfall 702 discharge over ground.

On-site personnel stated that as part of remedial actions, the Continuous Caster Wastewater Treatment Plant would discharge through Outfall 702 twice per week to prevent, in part, a build up of wastewater. The outfall had already been unplugged by the time of the inspection.

2. The Self Monitoring Program was rated as unsatisfactory for not monitoring final effluent at the frequency required by the permit. This is a violation of Part I. A. 10. of the permit which sets forth the effluent monitoring frequencies applicable to the discharge from Outfall 702. Due to the shorter and unexpected nature of the discharge, sampling of the discharge did not occur. The discharge was estimated to have occurred for roughly one hour and efforts were focused on ceasing the discharge. Please ensure all discharges are sampled and analyzed as required by the permit.

Part II. A. 1. of your permit requires you to comply with its terms and conditions. Any noncompliance with the terms of your permit may subject you to an enforcement action which can include the imposition of penalties. You are required to immediately take all necessary measures to comply with the terms and conditions of your NPDES Permit, specifically those violations identified above.

Within 30 days of receipt of this letter, a written detailed response documenting correction of the concerns listed above and/or a plan for assuring future compliance must be submitted to this office. Failure to respond adequately to this letter may result in formal enforcement action. Please direct your response to this letter to our letterhead address or via email to [wwViolationResponse@idem.IN.gov](mailto:wwViolationResponse@idem.IN.gov). Any questions should be directed to Nicholas Ream at 219-730-1691 or by email to [nream@idem.IN.gov](mailto:nream@idem.IN.gov). Thank you for your attention to this matter.

Sincerely,



Mark A. Amick, Director  
Southeast Regional Office

Enclosure



# NPDES Industrial Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: <b>IN0000205</b>		Facility Type: Industrial		Facility Classification: Major		Facility Classification: D		TEMPO AI ID 11555	
Date(s) of Inspection:		April 01, 2024							
Type of Inspection:		Reconnaissance Inspection							
Name and Location of Facility Inspected: <b>Cleveland-Cliffs Indiana Harbor - West</b> 3001 Dickey Road East Chicago IN 46312				County: Lake		Receiving Waters/POTW: Indiana Harbor Ship Canal		Permit Expiration Date: 1/31/2029	
								Design Flow: NA	
On Site Representative(s):									
First Name		Last Name		Title		Email		Phone	
Mariya		Conlon		Environmental Engineer		mariya.conlon@clevelandcliffs.com		219-256-0391	
Tom		Malinowsky		Environmental Consultant					
Was a verbal summary of the inspection given to the on-site rep? <b>Yes</b>									
Certified Operator: Michael Dauterman		Number: 19730	Class: D	Effective Date: 7-1-22	Expiration Date: 6-30-25	Email: michael.dauterman@clevelandcliffs.com			
Cyber Security Contact									
Name: Email:									
Responsible Official: Mr. Thomas Barnett, Environmental Manager 3001 Dickey Road East Chicago, Indiana 46312					Permittee: Cleveland-Cliffs Indiana Harbor - West				
					Email: thomas.barnett@clevelandcliffs.com				
					Phone: 219-313-1605			Contacted?	
					Fax:			Yes	
<b>INSPECTION FINDINGS</b>									
<input type="radio"/> Conditions evaluated were found to be satisfactory at the time of the inspection. (5)									
<input type="radio"/> Violations were discovered but corrected during the inspection. (4)									
<input type="radio"/> Potential problems were discovered or observed. (3)									
<input checked="" type="radio"/> Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM. (2)									
<input type="radio"/> Violations were discovered and may subject you to an appropriate enforcement response. (1)									
<b>AREAS EVALUATED DURING INSPECTION</b>									
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)									
N	Receiving Waters	S	Facility/Site	U	Self-Monitoring	N	Enforcement		
N	Effluent/Discharge	U	Operation	N	Flow Measurement				
S	Permit	N	Maintenance	N	Laboratory	N	Effluent Limits Compliance		
		N	Sludge	S	Records/Reports	N	Other:		
<b>DETAILED AREA EVALUATIONS</b>									
This inspection is being conducted in response to a self-reported bypass on Outfall 702 on March 22, 2024.									
<b>Effluent/Discharge:</b>									
Comments: Outfall 702 was not discharging at the time of the inspection.									
<b>Permit:</b>									
Comments: The facility has a valid permit.									
<b>Facility/Site:</b>									
Comments: All areas requested to be inspected were made available. The facility grounds are well maintained.									
<b>Operation:</b>									

Comments:

The Operation category was rated as unsatisfactory. Part II. B. 1. of the permit requires that all facilities and systems (and related appurtenances) for collection and treatment, which are installed or used by the permittee and which are necessary for achieving compliance with the terms and conditions of the permit in accordance with 327 IAC 5-2-8(8) must be maintained in good working order and efficiently operated at all times. On March 25, 2024, Cleveland-Cliffs personnel self-reported a bypass for Outfall 702 on March 22, 2024.

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**Self-Monitoring:**

Comments:

The Self Monitoring Program was rated as unsatisfactory for not monitoring final effluent at the frequency required by the permit. This is a violation of Part I. A. 10. of the permit which sets forth the effluent monitoring frequencies applicable to the discharge from Outfall 702. Due to the shorter and unexpected nature of the discharge on March 22, 2024, sampling of the discharge did not occur. The discharge was estimated to have occurred for roughly one hour and efforts were focused on ceasing the discharge. Please ensure all discharges are sampled and analyzed as required by the permit.

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**Records/Reports:**

The following records/reports were reviewed:

Comments:

Bypass notification was made in a timely manner.

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**Effluent Limits Compliance:**

No 1. Were DMRs reviewed as part of the inspection?

Comments:

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**IDEM REPRESENTATIVE**

Inspector Name:

Nicholas Ream

Email:

nream@idem.IN.gov

Phone Number:

219-730-1691

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**IDEM MANAGER REVIEW**

IDEM Manager:

Mark A. Amick

Date:

4/5/2024