

Cleveland-Cliffs Dearborn Works

**Application for Certificate of Alternative Compliance to comply with Sec. 13-535 of Dearborn
Bulk Solid Storage and Handling Ordinance**

Cleveland-Cliffs Dearborn Works (Dearborn Works) is submitting this Alternative Operating Plan with additional information to comply with Sec. 13-535 of the Dearborn Bulk Solid Storage and Handling Ordinance.

Contents of Alternative Operating Plan with Additional Information (Sec. 13-535.e.1)

1. Dearborn Works is satisfying the requirements of the ordinance by reliance on an alternative operating plan under MCL 324.5524(5), combined with additional information. This plan is included as **Attachment A**: Cleveland-Cliffs Dearborn Works Fugitive Dust Control Plan, Revised August 2022.
1a,d: Attachment B: Dearborn Works Fugitive Dust Map provides the facility boundaries, all buildings, and internal roadways on facility property. It also provides all potential emission points at the facility, including a depiction of the footprints of all bulk solid material storage piles, transfer points, conveyers, and roadways.
1b,e: Attachment C: Dearborn Works Ariel View: The Dearborn Works Ariel View shows all roadways and transportation corridors within one quarter mile of the perimeter of the facility that are used for transport of material to or from the facility. Dearborn Works is currently relying on the fugitive dust monitors and wind monitors at the EGLE operated Dearborn Site (Site ID 261630033) located approximately ¼ mile from the Dearborn Works property line. The location of this monitor is included in Attachment C.
1c: Attachment D: Stormwater Pollution Prevention Plan (SWPPP) contains the locations of all stormwater outfalls and storm drains.
2. A description of the facility's operations, including a list of all bulk solid materials that are construction bulk solid materials handled at, processed at, or transported to, from, or within the facility is included in Attachment A.
3. A description of the control measures used to minimize and control fugitive dust at the facility is included in Attachment A. Dearborn Works operates and maintains several control devices for dust control from operations. These devices and a description of how they are maintained and monitored is included in **Attachment E**. All Cleveland-Cliffs employees receive environmental training when hired and annual refresher training.
4. Attachment A provides specifics on how often paved roadways are required to be swept and flushed and how often chemical stabilizers are required to be applied. More detail of the specific record keeping is provided below:
 - 4a**. All paved roadway sweeping and flushing is recorded on a daily basis.
 - 4b**. The application of water and/or chemical stabilizers is recorded on an "as applied" basis. When applied, this is recorded by the day.
 - 4c**. Routine inspections are conducted in accordance with the state approved Fugitive Dust Plan to verify effectiveness of the plan. The inspections currently consist of weekly observations of paved roads, unpaved roads, parking lots, and storage piles for

emissions with requirements to take action if emissions are observed. Monthly EPA Method 9 observations are conducted on a random paved road, unpaved road, storage pile, and unpaved open area on a monthly basis to further audit the effectiveness of the plan. Responsibility for conducting the weekly observations is assigned to the contractors who implement the program. The contractors report directly to the Dearborn Works Environmental Affairs department.

4d. Records required by the Title V Permit (which includes all records related to Dearborn Works' Fugitive Dust Program) are maintained for a minimum of 5 years.

4b,d,f. Measures to comply with state stormwater regulations are detailed in Attachment D.

4c(1). The state approved Fugitive Dust Plan does not currently contain a height limit for piles. However, in accordance with the ordinance, Dearborn Works will restrict vertical distance from the grade immediately adjacent to a pile to the highest point of that pile to a maximum of 25 feet with one exception. Iron ore pellets cannot be shipped during the winter months due to the applicable waterways being shut down for cold weather and must therefore be stockpiled to allow for the continuous operation of the steel mill during the winter months. Therefore, Dearborn Works is seeking an exemption to the 25 foot height requirement for the Iron Ore Pellet pile. Dearborn Works proposes that the maximum pile height in this instance be 50 feet. Dearborn Works does not currently store any combustible materials capable of self-ignition through chemical action of its constituents.

4e. Dearborn Works will monitor wind speeds from the EGLE Salina Air Monitoring Station and will suspend handling activities for low silt materials (namely coke breeze and flue dust) until the high wind conditions have subsided.

Attachment A: Cleveland-Cliffs Dearborn Works Fugitive Dust Control Plan



CLEVELAND – CLIFFS DEARBORN WORKS FUGITIVE DUST CONTROL PLAN

September 2003

Revised September 2023

PLAN(E)-W-00-05

EXHIBIT A
FUGITIVE DUST CONTROL PLAN
Cleveland-Cliffs DEARBORN WORKS

1. Facility Name and Address:

Cleveland – Cliffs Corporation Dearborn Works
4001 Miller Road
Dearborn, MI 48121

2. Name and Address of Responsible Person:

Area Manager Environmental
Cleveland – Cliffs Steel Corporation Dearborn Works
Environmental Engineering
4001 Miller Road
Dearborn, MI 48120- 1699
Phone: (313) 845-3217

Summary of Source Descriptions and Control Measures

3. Diagram:

See attached Exhibit I.

4. Location of Unloading Operations:

See attached Exhibit I.

5. Description of Practices:

A. Raw material delivery and storage operations:

- 1) Raw materials, such as iron ore pellets and limestone are received at the dock in boats. The boats are equipped with conveyors, which provide self-unloading capability. The head end of the conveyor on each boat shall minimize the drop height to two feet, where possible, during unloading of the raw materials into the Hi-Line storage bins.
- 2) Coke is received by rail and unloaded in the EE Building. The EE Building is evacuated to a baghouse during unloading operations. The coke is stored in the Stockhouse and/or piles adjacent to the Stockhouse or in the raw material yard.
- 3) Briquettes are received by truck and stored in the Stockhouse and/or piles adjacent to the Stockhouse or in the raw material yard.

- 4) Other charge materials (e.g., BOF slag, *limestone*, etc.) are received by truck and stored in the Stockhouse and/or piles adjacent to the Stockhouse or in the raw material yard.
- 5) The lime receiving station at the Basic Oxygen Furnace is located at the southeast corner of the building. The south end of the station has a closable door. Lime is received in enclosed trucks and unloaded inside the building. The door at the south end of the building remains closed during unloading. The building is evacuated to a baghouse.
- 6) Coke breeze and iron ore screenings are stored in piles adjacent to the Stockhouse or in the raw material yard and subsequently sold or disposed.

B. Handling and storage of collectate from pollution control equipment:

- 1) Collectate from the baghouse controlling the coke unloading operation in EE Building is periodically vacuumed out and transferred to the onsite Debris pile. Adequate steps to prevent control equipment collectate from becoming fugitive dust will be taken, such as mixing with water at the debris pile or adding water when necessary.
- 2) The coke screening building (DD Building), located north of EE Building and east of the Hi-Line, is evacuated by a baghouse. Undersize material is screened out, stored in the coke breeze storage bin, and subsequently sold.
- 3) Collectate from the raw material handling system baghouse is periodically vacuumed out and transferred to the on site debris pile. Adequate steps to prevent control equipment collectate from becoming fugitive dust will be taken, such as mixing with water at the debris pile or adding water when necessary.
- 4) Dust is periodically emptied from the blast furnace flue dust collectors and stored on site and subsequently sold.
- 5) Collectate from the lime receiving station baghouse is periodically vacuumed out and disposed of or recycled.
- 6) During the steel making process at the Basic Oxygen Furnace emissions are generated, and captured in a "drop-out chamber" and an electrostatic precipitator. The collectate is moved by screw conveyors and covered belt conveyor to a storage bin, then loaded into a truck. The material is discharged through a retractable snorkel, wetted, and then covered prior to transport to landfill or recycling. Water is not used if transported by a pneumatic truck.

- 7) Collectate from the BOF secondary emissions baghouse is periodically vacuumed out and transferred to an enclosed rolloff box.
- 8) Collectate from the desulfurization baghouse bins is periodically vacuumed out and transferred to the onsite debris pile. Adequate steps to prevent control equipment collectate from becoming fugitive dust will be taken, such as mixing with water at the debris pile or adding water when necessary.
- 9) Collectate from the No.1 Ladle Refining Facility baghouse is periodically vacuumed out and transferred to an enclosed rolloff box.
- 10) Collectate from the No.2 Ladle Refining Facility baghouse is periodically vacuumed out and transferred to an enclosed rolloff box.
- 11) Collectate from the "C" Blast Furnace baghouse is periodically vacuumed out and transferred to an enclosed roll off box.
- 12) Collectate from the PLTCM Scalebreaker Baghouse is collected in super sacks and is either transferred to the onsite debris pile or subsequently sold.
- 13) Collectate from the Machine Scarfing Baghouse is collected in super sacks and disposed offsite. *Machine Scarfing operation has been idled since March 2020.*

C. Other operations:

- 1) Periodically, materials must be stored in piles outside the exempt area shown in Exhibit I (west of the Blast Furnaces). These materials are *primarily* coke, iron ore fines, limestone, coke screenings, sand, and blast furnace flue dust, and iron scrap (included Hot Briquetted Iron or HBI). The active piles will be treated with an asphalt emulsion, petroleum resin, or acrylic cement, once per month from March through October. An active pile is defined as a storage pile that is disturbed once per month or more. Inactive piles will be treated with an asphalt emulsion, petroleum resin, or acrylic cement, once per year. An inactive pile is defined as a storage pile that is disturbed less than once per month.
- 2) Normal access areas surrounding storage piles will be treated with an asphalt emulsion, petroleum resin, or an acrylic cement, once per month from March through October.
- 3) Field stored materials are reclaimed using a front-end loader and loaded

into trucks or railroad cars. During loading of vehicles the clearance between the bottom of the loader bucket and the vehicle sideboard will be Maintained at two feet maximum.

D. Open areas and unpaved roads:

- 1) Open areas are indicated on Exhibit I. They will be treated with an asphalt emulsion, petroleum resin, or acrylic cement, *a minimum of* once per month between March and October.
- 2) Unpaved roads are shown on Exhibit I. They will be treated with an asphalt emulsion, petroleum resin, or acrylic cement, a minimum of once every twelve (12) days between March and October.

E. Paved area control practices:

There are approximately 5.1 miles of paved roadways within the Cleveland - Cliffs Facility. Asphalt is the predominant surfacing material on all paved areas except Gate 12 Road, which is concrete. Treatment procedures employed for dust control on paved roadways and parking lots are primarily devoted to sweeping and flushing practice. Specific treatment procedures are described below.

- 1) Wet Sweeping
 - a. All paved roadways identified on Exhibit I receive wet sweeper treatments on a daily schedule (five days a week, March through October).
 - b. The traveled portion of parking areas (Exhibit 1) will receive wet sweep treatments once a month from March through October. A greater frequency rate will be implemented on these areas if warranted due to extended dry weather. The non traveled portions of parking lots will be swept and cleaned a minimum of three times per year.
 - c. Materials and debris picked up during wet sweep activities will be transported and deposited in a designated holding site. Appropriate control measures will be implemented when necessary to further reduce fugitive dust emission potential from the sweeping debris Material piles.
- 2) Street Flushing

All paved roadways in the Cleveland - Cliffs Facility will receive flusher treatments on a daily schedule, five days a week for eight months (March

through October) of the year when outside temperatures are above freezing. Roadway assignments are presented in Exhibit I.

3) Equipment

Equipment utilized to implement the fugitive dust plan is either on site or Contracted as necessary.

4) Schedule Change

Roadway treatment application schedules presented in this plan may be modified on a short-term basis in response to adverse meteorological conditions or unusual circumstances requiring street cleaner equipment, such as spill situations or raw material handling. Daily treatment procedures will be foregone when:

- Daily precipitation exceeds 0.1 in.
- Freezing is a concern.
- Road salt is applied and for 48 hours thereafter

5) Additional Measure

- a. To control dust during scheduled raw material handling over paved surfaces, a flusher vehicle will sprinkle the truck hauling route.
- b. Speed signs have been posted on major paved roadways throughout the Cleveland – Cliffs Facility to maintain lower vehicular speeds. Maximum posted limit is 20 mph.

F. Material handling conveyors:

- 1) Coke handling conveyors are shown on Exhibit I. All of these conveyors are either totally enclosed or covered with a 180 degree cover.
- 2) The Blast Furnace Raw Material Handling Conveyor System is shown in Exhibit I. The "B" and "C" Blast Furnace charging conveyors are totally enclosed (360 degrees). All other conveyors have a 180 degree cover. All transfer points are covered.
- 3) The lime handling conveyor at the Basic Oxygen Furnace Building, including the transfer point, is enclosed. This conveyor is shown on Exhibit I.
- 4) The precipitator dust handling conveyor at the Basic Oxygen Furnace Building is shown on Exhibit I. The conveyor has a 180 degree cover over the belt.

G. Dust Suppressant

The suppressant used will be an acrylic cement, petroleum resin, or an asphalt emulsion. It is diluted with water in a ratio of not less than 1 part suppressant to 9 parts water and applied at a rate of 0.3 gallons of solution per square yard of surface area covered throughout the plant (all sources).

H. Records in the format of Attachment I will be kept for a period of two years.

(Note: See attached EGLE Required Recordkeeping for Fugitive Dust Source Addendum for additional information.)

ADDENDUM

Recordkeeping for Fugitive Dust Sources

ADDENDUM
Recordkeeping for Fugitive Dust Sources

Required Records

Unpaved Roads/ Lots

1. Date of treatment
2. Control measure used
3. Responsible person's initials
4. Name of product applied
5. Amount of solution/water applied
6. Dilution ratio
7. Road segment/lot identification

Paved Roads/Lots

1. Date of treatment
2. Control measure used
3. Responsible person's initials
4. Road segment/lot identification

Storage Piles/Materials Handling

1. Date of treatment
2. Control measure used
3. Responsible person's initials
4. Dilution ratio (if applicable)
5. Amount of dust suppressant/water applied
6. Identification of pile/material handling operations treated
7. Equipment used

Optional Records

Weather Conditions

1. Precipitation
2. Temperature
3. Wind direction and velocity

ATTACHMENT I

**Daily Summary of Dust Suppressant Application to Unpaved
Roads**



Unpaved Road / Storage Pile Non-Certified VE Observation Log

Date: _____
Initials: _____

Observations once per week (MARCH - OCTOBER)

	AREA IDs	Weekly Observation Made (Y / N)	Were Any Fugitive Emissions Observed (Y / N)?	If Emissions Observed, Describe Corrective Actions Taken
A	Slab Road			
C	S.R.-B			
D	S.R.-C			
E	S.R.-D			
J	Hi-LO repair			
O	Behind Hi-Lo Repair			
P	Klein Repair			
Q	East Yard			
R	Bag House Road			
T	Slag Haul Road *			
U	Scrap Bldg. Road			
V	East Klein Road / East Klein Alleyway			
W	EAF Road (Levy)			
X	West Klein Road			
Y	CC Locker Road			
Z	West Side Caster			
AA	Coke Oven			
AB	Old Coke Oven Road			
AC	J9 Office			
AD	Machine Scarfer Slab Entry			
AE	Blast Furnace Stockhouse **			
AF	BOF Scrap Area (Directly in front of BOF)			
STORAGE PILES				
OTHERS				
AG	ESP Dust Box Staging Area along Gate 12 Road **			
AH	Contractor Parking Area Near IPO **			

Note:

*For T, if cannot observe because of slab storage or other issue, please note reason

** AE, AG, AH Area not regulated by Fugitive Dust Plan. On form for tracking purposes.



Storage Pile Dust Control Emulsion Application Summary

Dearborn Works

Date: _____

Initials: _____

Name of product applied: _____

Dilution Ratio: _____

Equipment Used: _____

AREA IDs	EMULSION (Gallons)	WATER (Gallons)	TOTAL (Gallons)
ACTIVE PILES (Treated once per month - March through October)			
New Levy Debris Pile/East Debris Pile			
Old Levy Debris Pile / West Debris Pile			
Nut Coke Piles in Laydown Area			
Coke Blend Near DD and EE Buildings and between Coke Oven and Old Coke Oven Roads			
Coke Blend or any New Raw Material between Miller Road and Gate 2 Road			
Coke Breeze near DD Building and in Laydown Yard			
Ore Fines near Gate 1 and along Coke Over Road			
Flue Dust Next to Ore Fines and between Coke Oven Road and Old Coke Oven Road			
Blast Furnace WWTP Pile on "F" Road			
Sand Pile (Along BF Slag Haul Road)			
Limestone near Ore Fines Pile			
BOF Roadway Slag			
HBI South of Visitor Center and in Laydown Yard			
HBI Piles at Steelmaking (Open Area South of Warehouse, or on South Side of Caster Building - Does not include anything staged in front of BOF where scrap is actively loaded)			
INACTIVE PILES (Treated once per year - March through October)			
Ilmenite in Laydown Yard			
GRAND TOTALS			

Notes: Must also treat normal access areas surrounding storage piles
 If Pile is zeroed out and no longer present, indicate with "NA" in Emulsion Column

**Paved Road Dust Control
Sweep and Flush Log**

Date: _____
Initials: _____

Check box if there was excessive precipitation (greater than 0.1 inches), or temperatures were below freezing.

**All roads must be swept and flushed at least once per day, 5 days per week
(MARCH - OCTOBER)**

PAVED ROAD	SWEPT (Y / N)	NO. OF TIMES	FLUSHED (Y / N)	NO. OF TIMES
<i>B ROAD (EAST OF BF; aka IPO Rd)</i>				
<i>ROAD 2 (Powerhouse to Gate 2 Bldg)</i>				
<i>COKE OVEN ROAD and access to Dix Rd.</i>				
<i>F ROAD (EAST BOAT SLIP RD)</i>				
<i>H ROAD (WEST BOAT SLIP RD)</i>				
<i>ROW ROAD (SOUTH OF ROW)</i>				
<i>I ROAD (EAST OF COLD MILL)</i>				
<i>J ROAD (WEST OF BOF) *</i>				
<i>CASTER WATER TREATMENT ROAD</i>				
<i>COIL ROAD ("L" Road)</i>				
<i>HOT BAND SHIPPING AREA & F-36 **</i>				
<i>SLAB ROAD (paved section)</i>				
<i>GATE 12 ROAD and access to Schaefer</i>				
<i>PLTCM/HSM ACCESS ROADS / AREAS</i>				
<i>BAND STORAGE AREA</i>				
<i>O ROAD (Between HSM & HDGL)</i>				
<i>WEST HSM ROAD (HYSTER ROAD)</i>				
<i>"N" Road (West of PLTCM and ROLL SHOP)</i>				
<i>EAST HDGL ROAD</i>				

Note:

ALL "NO" RESPONSES REQUIRE A WRITTEN REASON WHY ROAD WAS NOT SWEEPED OR FLUSHED IN COMMENTS SECTION

*Includes paved roads on west side of ESP, West side of Tundish building, and East side of Used Oil Pad

**By COIL ROAD, area south of ROAD 4

COMMENTS



Paved Road Non-Certified Visible Emissions Observation Log

Date: _____

Initials: _____

Observations required once per week (MARCH - OCTOBER)

PAVED ROAD	Weekly Observation Made (Y / N)	Fugitive Emssions Observed? (Y / N)	If Fugitive Emissions Observed, Describe Corective Actions Taken
<i>B ROAD (EAST OF BF; aka IPO Rd)</i>			
<i>ROAD 2 (Powerhouse to Gate 2 Bldg)</i>			
<i>COKE OVEN ROAD and access to Dix Rd.</i>			
<i>F ROAD (EAST BOAT SLIP RD)</i>			
<i>H ROAD (WEST BOAT SLIP RD)</i>			
<i>ROW ROAD (SOUTH OF ROW)</i>			
<i>I ROAD (EAST OF COLD MILL)</i>			
<i>J ROAD (WEST OF BOF) *</i>			
<i>CASTER WATER TREATMENT ROAD</i>			
<i>COIL ROAD</i>			
<i>HOT BAND SHIPPING AREA & F-36 **</i>			
<i>SLAB ROAD (paved section)</i>			
<i>GATE 12 ROAD and access to Schaefer</i>			
<i>PLTCM/HSM ACCESS ROADS / AREAS</i>			
<i>BAND STORAGE AREA</i>			
<i>O ROAD (Between HSM & HDGL)</i>			
<i>WEST HSM ROAD (HYSTER ROAD)</i>			
<i>"N" Road (West of PLTCM and ROLL SHOP)</i>			
<i>EAST HDGL ROAD</i>			

Note:

*Includes paved roads on west side of ESP, West side of Tundish building, and East side of Used Oil Pad

**By COIL ROAD, area south of ROAD 4

COMMENTS

**Parking Lot Dust Control
Sweep and Flush Log**

Date: _____

Initials: _____

Parking Lots are to be swept and flushed ONCE PER MONTH (MARCH - OCTOBER)

PARKING LOT	<u>SWEPT</u> (Y/N)	NO. OF TIMES	<u>FLUSHED</u> (Y/N)	NO. OF TIMES
MILLER ROAD PARKING LOT				
GATE 11 PARKING LOT				
A.O.B. PARKING LOT				
HGDL ZINC DELIVERY & PARKING LOT				
PLTCM/ESF PARKING LOT				
SLAB YARD OFFICE PARKING LOT				
HOT BAND SHIPPING YARD				
H.S.M. CAMS PARKING LOT				
POTENTIAL 'CAL' LINE AREA				
HOURLY EMPLOYEE PARKING				
BOF & CASTER PARKING LOT				
A22 SHIPPING - Paved Area				
CCOO (SOO) PARKING LOT				
A46 SHIPPING				
COLD MILL PARKING LOT				
CC.O.W. (S.O.W.) PARKING LOT				
CENTRAL MEDICAL PARKING LOT				
BLAST FURNACE WWTP PARKING LOT				
RAILROAD OPERATIONS PARKING LOT				
SAFETY PARKING LOT				
IPO EAST & WEST PARKING LOT				
GATE 2 PARKING LOT				
VISITOR CENTER LOT (LEARNING LAB LOT)				
FINISHING ENGINEERING TRAILER				
PCI LOADOUT & ROAD				

Note:

ALL "NO" RESPONSES REQUIRE A WRITTEN REASON WHY PARKING LOT WAS NOT SWEEPED OR FLUSHED IN COMMENTS SECTION

COMMENTS



Parking Lot Non-Certified Visible Emissions Observation Log

Date: _____

Initials: _____

Observations required once per week (MARCH - OCTOBER)

PARKING LOT	Weekly Observation Made (Y / N)	Fugitive Emissions Observed? (Y / N)	If Fugitive Emissions Observed, Describe Corective Actions Taken
MILLER ROAD PARKING LOT			
GATE 11 PARKING LOT			
A.O.B. PARKING LOT			
HGDL ZINC DELIVERY & PARKING LOT			
PLTCM/ESF PARKING LOT			
SLAB YARD OFFICE PARKING LOT			
HOT BAND SHIPPING YARD			
H.S.M. CAMS PARKING LOT			
POTENTIAL 'CAL' LINE AREA			
<i>HOURLY EMPLOYEE PARKING</i>			
BOF & CASTER PARKING LOT			
A22 SHIPPING - Paved Area			
CCOO (SOO) PARKING LOT			
A46 SHIPPING			
COLD MILL PARKING LOT			
CC O.W. (S.O.W.) PARKING LOT			
CENTRAL MEDICAL PARKING LOT			
BLAST FURNACE WWTP PARKING LOT			
RAILROAD OPERATIONS PARKING LOT			
SAFETY PARKING LOT			
IPO EAST & WEST PARKING LOT			
GATE 2 PARKING LOT			
VISITOR CENTER LOT (LEARNING LAB LOT)			
FINISHING ENGINEERING TRAILER			
PCI LOADOUT & ROAD			

COMMENTS

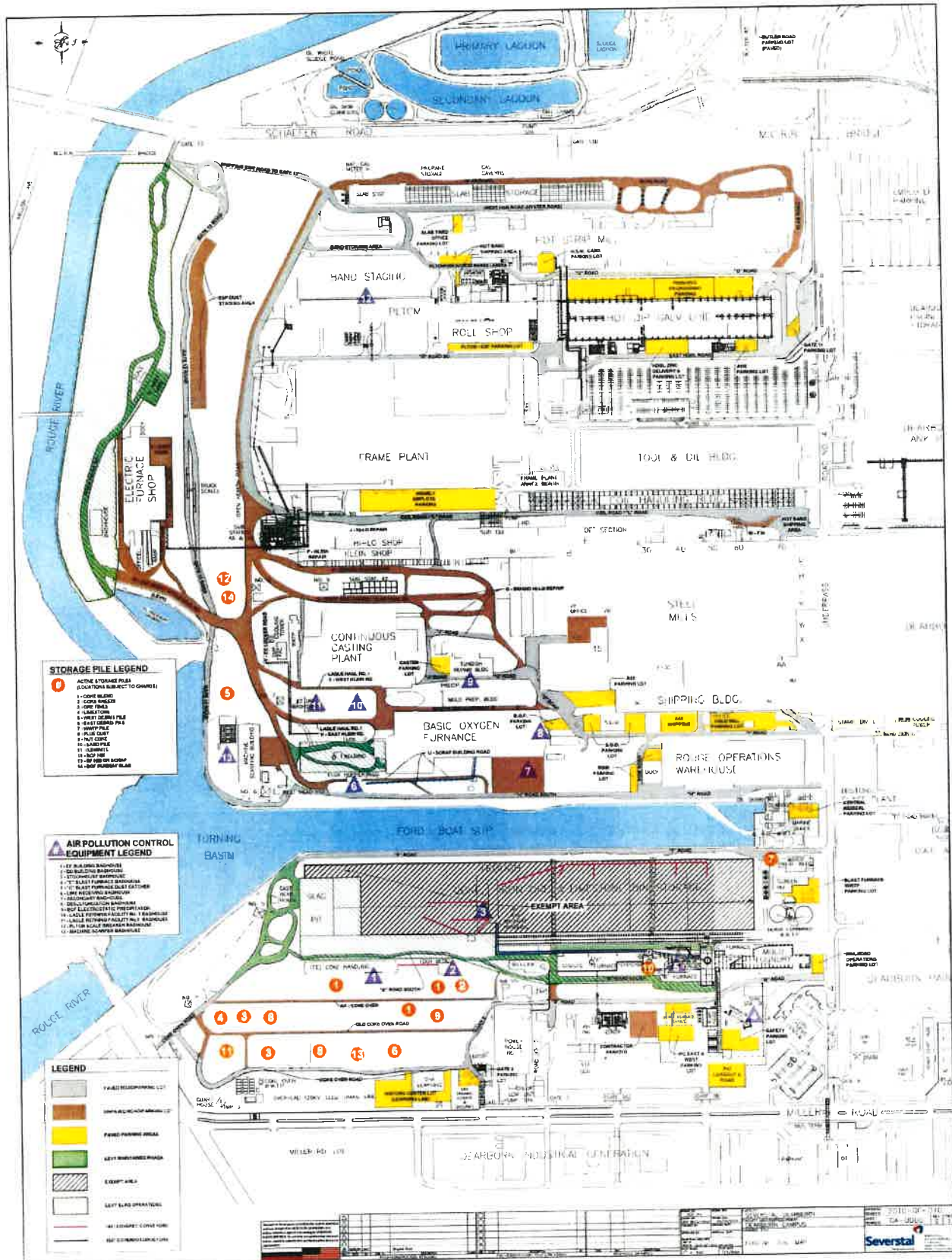
Month: February Year: 2024

Road Spray Application Summary
Emission and Water

Area ID	Area (Sq Ft)	Emission	Volume Applied, Gallons												Total (gallons)																	
			ASPHALT APPLICATION						WATER APPLICATION																							
			2/1	2/2	2/3	2/4	2/5	2/6	2/7	2/8	2/9	2/10	2/11	2/12	2/13	2/14	2/15	2/16	2/17	2/18	2/19	2/20	2/21	2/22	2/23	2/24	2/25	2/26	2/27	2/28		
A	151440	Strip Road																													0	
B	24350	SR B																														0
C	24350	SR C																														0
D	24350	SR D																														0
E	18666	H.L.S. Stone																														0
F	24350	Strip Road																														0
G	24350	Strip Road																														0
H	12000	East Side																														0
I	6000	SR D (Half Road)																														0
J	10000	Strip Road																														0
K	10000	Strip Road																														0
L	10000	Strip Road																														0
M	10000	Strip Road																														0
N	10000	Strip Road																														0
O	10000	Strip Road																														0
P	10000	Strip Road																														0
Q	10000	Strip Road																														0
R	10000	Strip Road																														0
S	10000	Strip Road																														0
T	10000	Strip Road																														0
U	10000	Strip Road																														0
V	10000	Strip Road																														0
W	10000	Strip Road																														0
X	10000	Strip Road																														0
Y	10000	Strip Road																														0
Z	10000	Strip Road																														0
AA	10000	Strip Road																														0
AB	10000	Strip Road																														0
AC	10000	Strip Road																														0
AD	10000	Strip Road																														0
AE	10000	Strip Road																														0
AF	10000	Strip Road																														0
AG	10000	Strip Road																														0
AH	10000	Strip Road																														0
AI	10000	Strip Road																														0
AJ	10000	Strip Road																														0
AK	10000	Strip Road																														0
AL	10000	Strip Road																														0
AM	10000	Strip Road																														0
AN	10000	Strip Road																														0
AO	10000	Strip Road																														0
AP	10000	Strip Road																														0
AQ	10000	Strip Road																														0
AR	10000	Strip Road																														0
AS	10000	Strip Road																														0
AT	10000	Strip Road																														0
AV	10000	Strip Road																														0
AW	10000	Strip Road																														0
AX	10000	Strip Road																														0
AY	10000	Strip Road																														0
AZ	10000	Strip Road																														0
BA	10000	Strip Road																														0
BB	10000	Strip Road																														0
BC	10000	Strip Road																														0
BD	10000	Strip Road																														0
BE	10000	Strip Road																														0
BF	10000	Strip Road																														0
BG	10000	Strip Road																														0
BH	10000	Strip Road																														0
BI	10000	Strip Road																														0
BJ	10000	Strip Road																														0
BK	10000	Strip Road																														0
BL	10000	Strip Road																														0
BM	10000	Strip Road																														0
BN	10000	Strip Road																														0
BO	10000	Strip Road																														0
BP	10000	Strip Road																														0
BQ	10000	Strip Road																														0
BR	10000	Strip Road																														0
BS	10000	Strip Road																														0
BT	10000	Strip Road																														0
BV	10000	Strip Road																														0
BW	10000	Strip Road																														0
BX	10000	Strip Road																														0
BY	10000	Strip Road																														

EXHIBIT I

Fugitive Dust Sources



- STORAGE PILE LEGEND**
- 1 ACTIVE STORAGE PILES (LOCATIONS SUBJECT TO CHANGE)
- 1 - CORE PILES
 - 2 - CORE PILES
 - 3 - CORE PILES
 - 4 - CORE PILES
 - 5 - CORE PILES
 - 6 - CORE PILES
 - 7 - CORE PILES
 - 8 - CORE PILES
 - 9 - CORE PILES
 - 10 - CORE PILES
 - 11 - CORE PILES
 - 12 - CORE PILES
 - 13 - CORE PILES
 - 14 - CORE PILES

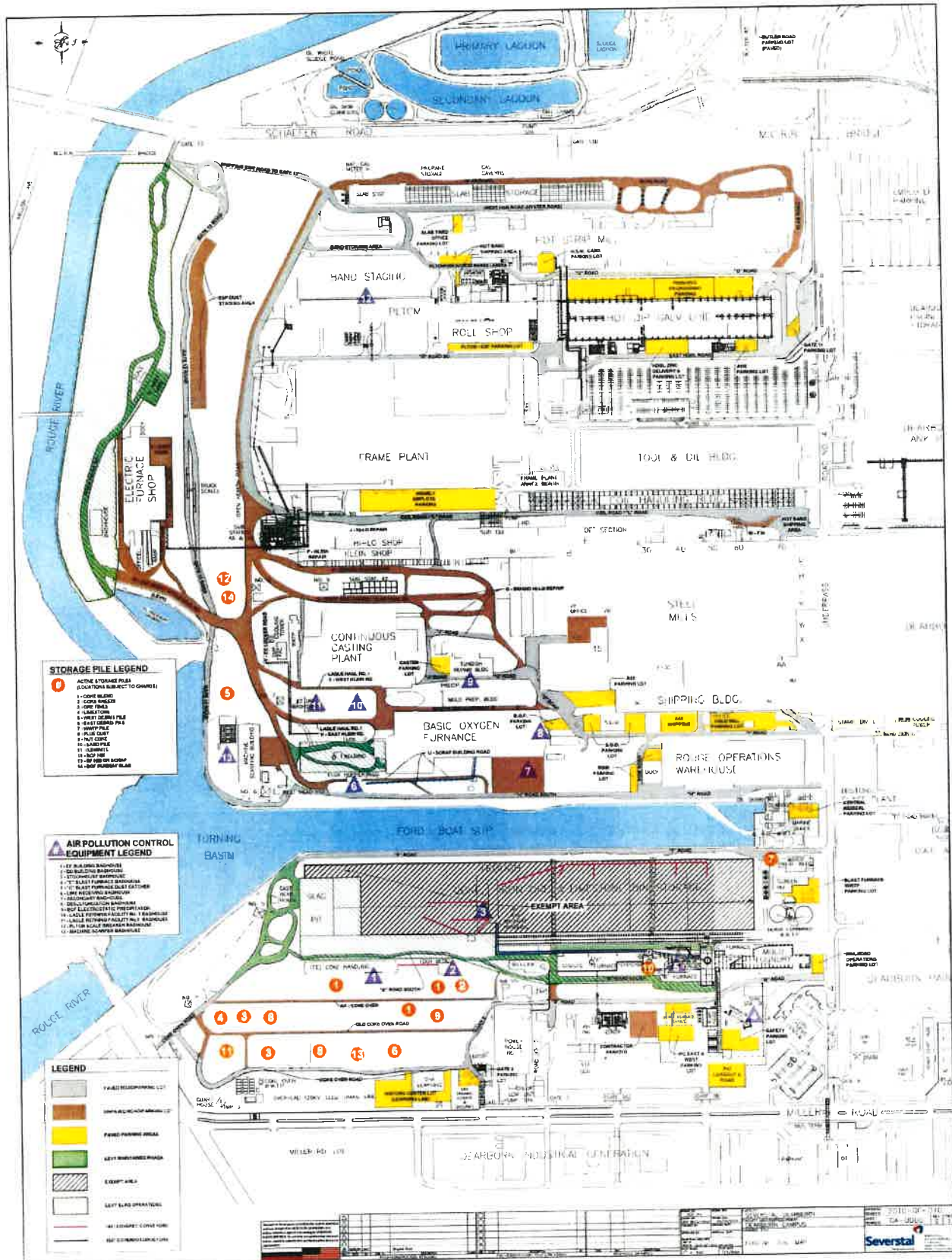
- AIR POLLUTION CONTROL EQUIPMENT LEGEND**
- 1 - 100% BAGHOUSE
 - 2 - 100% BAGHOUSE
 - 3 - 100% BAGHOUSE
 - 4 - 100% BAGHOUSE
 - 5 - 100% BAGHOUSE
 - 6 - 100% BAGHOUSE
 - 7 - 100% BAGHOUSE
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 - 9 - 100% BAGHOUSE
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 - 11 - 100% BAGHOUSE
 - 12 - 100% BAGHOUSE
 - 13 - 100% BAGHOUSE
 - 14 - 100% BAGHOUSE

- LEGEND**
- 1 - PAVED REPAIRING LOT
 - 2 - DRIVEWAY/ACCESS ROAD
 - 3 - PAVED PARKING AREA
 - 4 - ASPHALT DRIVEWAY
 - 5 - EXEMPT AREA
 - 6 - ASPHALT DRIVEWAY
 - 7 - ASPHALT DRIVEWAY
 - 8 - ASPHALT DRIVEWAY
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 - 13 - ASPHALT DRIVEWAY
 - 14 - ASPHALT DRIVEWAY

DATE	2010-08-14
PROJECT	SEVERSTAL
SCALE	AS SHOWN
DRAWN BY	...
CHECKED BY	...
APPROVED BY	...

Severstal

Attachment B: Dearborn Works Fugitive Dust Map



- STORAGE PILE LEGEND**
- ① ACTIVE STORAGE PILES (LOCATIONS SUBJECT TO CHANGE)
- 1 - CORE PILES
 - 2 - CORE PILES
 - 3 - CORE PILES
 - 4 - CORE PILES
 - 5 - CORE PILES
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 - 7 - CORE PILES
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 - 44 - CORE PILES
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 - 50 - CORE PILES

- AIR POLLUTION CONTROL EQUIPMENT LEGEND**
- 1 - 100% EFFICIENCY BAGHOUSE
 - 2 - 95% EFFICIENCY BAGHOUSE
 - 3 - 90% EFFICIENCY BAGHOUSE
 - 4 - 85% EFFICIENCY BAGHOUSE
 - 5 - 80% EFFICIENCY BAGHOUSE
 - 6 - 75% EFFICIENCY BAGHOUSE
 - 7 - 70% EFFICIENCY BAGHOUSE
 - 8 - 65% EFFICIENCY BAGHOUSE
 - 9 - 60% EFFICIENCY BAGHOUSE
 - 10 - 55% EFFICIENCY BAGHOUSE
 - 11 - 50% EFFICIENCY BAGHOUSE
 - 12 - 45% EFFICIENCY BAGHOUSE
 - 13 - 40% EFFICIENCY BAGHOUSE
 - 14 - 35% EFFICIENCY BAGHOUSE
 - 15 - 30% EFFICIENCY BAGHOUSE
 - 16 - 25% EFFICIENCY BAGHOUSE
 - 17 - 20% EFFICIENCY BAGHOUSE
 - 18 - 15% EFFICIENCY BAGHOUSE
 - 19 - 10% EFFICIENCY BAGHOUSE
 - 20 - 5% EFFICIENCY BAGHOUSE
 - 21 - 0% EFFICIENCY BAGHOUSE
 - 22 - 100% EFFICIENCY BAGHOUSE
 - 23 - 95% EFFICIENCY BAGHOUSE
 - 24 - 90% EFFICIENCY BAGHOUSE
 - 25 - 85% EFFICIENCY BAGHOUSE
 - 26 - 80% EFFICIENCY BAGHOUSE
 - 27 - 75% EFFICIENCY BAGHOUSE
 - 28 - 70% EFFICIENCY BAGHOUSE
 - 29 - 65% EFFICIENCY BAGHOUSE
 - 30 - 60% EFFICIENCY BAGHOUSE
 - 31 - 55% EFFICIENCY BAGHOUSE
 - 32 - 50% EFFICIENCY BAGHOUSE
 - 33 - 45% EFFICIENCY BAGHOUSE
 - 34 - 40% EFFICIENCY BAGHOUSE
 - 35 - 35% EFFICIENCY BAGHOUSE
 - 36 - 30% EFFICIENCY BAGHOUSE
 - 37 - 25% EFFICIENCY BAGHOUSE
 - 38 - 20% EFFICIENCY BAGHOUSE
 - 39 - 15% EFFICIENCY BAGHOUSE
 - 40 - 10% EFFICIENCY BAGHOUSE
 - 41 - 5% EFFICIENCY BAGHOUSE
 - 42 - 0% EFFICIENCY BAGHOUSE
 - 43 - 100% EFFICIENCY BAGHOUSE
 - 44 - 95% EFFICIENCY BAGHOUSE
 - 45 - 90% EFFICIENCY BAGHOUSE
 - 46 - 85% EFFICIENCY BAGHOUSE
 - 47 - 80% EFFICIENCY BAGHOUSE
 - 48 - 75% EFFICIENCY BAGHOUSE
 - 49 - 70% EFFICIENCY BAGHOUSE
 - 50 - 65% EFFICIENCY BAGHOUSE
 - 51 - 60% EFFICIENCY BAGHOUSE
 - 52 - 55% EFFICIENCY BAGHOUSE
 - 53 - 50% EFFICIENCY BAGHOUSE
 - 54 - 45% EFFICIENCY BAGHOUSE
 - 55 - 40% EFFICIENCY BAGHOUSE
 - 56 - 35% EFFICIENCY BAGHOUSE
 - 57 - 30% EFFICIENCY BAGHOUSE
 - 58 - 25% EFFICIENCY BAGHOUSE
 - 59 - 20% EFFICIENCY BAGHOUSE
 - 60 - 15% EFFICIENCY BAGHOUSE
 - 61 - 10% EFFICIENCY BAGHOUSE
 - 62 - 5% EFFICIENCY BAGHOUSE
 - 63 - 0% EFFICIENCY BAGHOUSE

- LEGEND**
- 1 - PAVED REPAIRING LOT
 - 2 - DRIVEWAY/ACCESS ROAD
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 - 4 - ASPHALT DRIVEWAY
 - 5 - EXEMPT AREA
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 - 100 - ASPHALT DRIVEWAY

PROJECT NO.	DATE	SCALE	BY	CHECKED	APPROVED
2010-08-14	2010-08-14	AS SHOWN	J. J. [unreadable]	[unreadable]	[unreadable]
<p>Severstal</p>					

Attachment C: Dearborn Works Ariel View

Attachment D: Dearborn Works Stormwater Pollution Prevention Plan (SWPPP)



STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

Cleveland-Cliffs Steel Corporation Dearborn Works
4001 Miller Road
Dearborn, MI 48120
Located in
CITY OF DEARBORN WAYNE COUNTY, MICHIGAN

Revision: Release
November 18, 2021

Revised January 12, 2024

CC DOCUMENT CONTROL # PLAN-W-00-04

Prepared by:
PHI Environmental Consulting
4844 Jackson Road, Suite 205
Ann Arbor, MI 48103
Website: www.phiconsulting.com



TABLE OF CONTENTS

1.0	OVERVIEW	1
2.0	GENERAL FACILITY DESCRIPTION	2
2.1	STORM WATER POLLUTION PREVENTION TEAM.....	3
2.2	STORM WATER DRAINAGE AT THE FACILITY	3
2.3	IDENTIFICATION OF SIGNIFICANT MATERIALS.....	3
2.4	SPILL, LEAK, AND RELEASE HISTORY.....	3
3.0	FACILITY DRAINAGE AREAS	4
3.1	DRAINAGE AREA 001 (NPDES MONITORING POINTS 001A)	4
3.1.1	AREA STORM WATER DRAINAGE	4
3.1.2	EXPOSED SIGNIFICANT MATERIALS	4
3.1.3	NON-STORM WATER DISCHARGES	5
3.2	DRAINAGE AREA 002 (NPDES MONITORING POINT 002A)	5
3.2.1	AREA STORM WATER DRAINAGE	6
3.2.2	EXPOSED SIGNIFICANT MATERIALS	6
3.2.3	NON-STORM WATER DISCHARGES	7
3.3	DRAINAGE AREA 004B (NPDES MONITORING POINT 004B)	7
3.3.1	AREA STORM WATER DRAINAGE	7
3.3.2	EXPOSED SIGNIFICANT MATERIALS	7
3.3.3	NON-STORM WATER DISCHARGES	8
3.4	DRAINAGE AREA 004C (NPDES MONITORING POINT 004C).....	8
3.4.1	AREA STORM WATER DRAINAGE	8
3.4.2	EXPOSED SIGNIFICANT MATERIALS	8
3.4.3	NON-STORM WATER DISCHARGES	9
3.5	DRAINAGE AREA 004D (NPDES MONITORING POINT 004D).....	9
3.5.1	AREA STORM WATER DRAINAGE	9
3.5.2	EXPOSED SIGNIFICANT MATERIALS	9
3.5.3	NON-STORM WATER DISCHARGES	10
3.6	DRAINAGE AREA 004E (NPDES MONITORING POINT 04E0)	10
3.6.1	AREA STORM WATER DRAINAGE	10
3.6.2	EXPOSED SIGNIFICANT MATERIALS	10
3.6.3	NON-STORM WATER DISCHARGES	11
3.7	DRAINAGE AREA 006 (NPDES MONITORING POINT 006A)	11
3.7.1	AREA STORM WATER DRAINAGE	11
3.7.2	EXPOSED SIGNIFICANT MATERIALS	11
3.7.3	NON-STORM WATER DISCHARGES	12

3.8	FACILITY NO-DRAINAGE/NO POINT SOURCE DISCHARGE AREAS (NO NPDES MONITORING POINTS/OUTFALLS)	12
3.8.1	AREA STORM WATER DRAINAGE	12
3.8.2	EXPOSED SIGNIFICANT MATERIALS	13
3.8.3	NON-STORM WATER DISCHARGES	13
4.0	REASONABLE POTENTIAL TO CONTRIBUTE TO RUN-OFF	13
5.0	TOTAL MAXIMUM DAILY LOAD REQUIREMENTS	14
6.0	NPDES MONITORING PARAMETERS	15
7.0	NON-STRUCTURAL CONTROL MEASURES	15
7.1	ROUTINE INSPECTIONS AND PREVENTATIVE MAINTENANCE PROGRAMS.....	15
7.2	GOOD HOUSEKEEPING PRACTICES.....	16
7.3	QUARTERLY COMPREHENSIVE SITE INSPECTION	16
7.4	SIGNIFICANT MATERIAL STORAGE AND HANDLING PROCEDURES	17
7.5	SPILL PREVENTION AND RESPONSE PROCEDURES	17
7.6	SEDIMENTATION AND SOIL EROSION CONTROL.....	17
7.7	EMPLOYEE SWPPP TRAINING PROGRAMS	17
7.8	TMDL REQUIREMENTS.....	18
7.9	LIST OF SIGNIFICANT MATERIALS STILL PRESENT	18
8.0	STRUCTURAL CONTROL MEASURES	18
9.0	SWPPP REVIEW AND UPDATE	19
10.0	RECORDKEEPING AND REPORTING	19
11.0	CERTIFICATION OF THE SWPPP	20
12.0	SWPPP REVISIONS LOG	21
13.0	TABLES	22
	TABLE 1 – SURFACE WATER OUTFALLS.....	22
	TABLE 2 – SIGNIFICANT MATERIALS LIST.....	23
	TABLE 3 – LIST OF SIGNIFICANT SPILLS – THREE YEARS PRIOR TO PERMIT EFFECTIVE DATE (02/01/2015).....	28

APPENDICIES

- **Appendix A – Site Maps**
- **Appendix B – Report Forms**
- **Appendix C – Pile Management Plan**
- **Appendix D – TMDL Documentation**

1.0 OVERVIEW

The Storm Water Pollution Prevention Plan (SWPPP) covers the operations at the Cleveland-Cliffs Steel Corporation Dearborn Works (Dearborn Works) facility located in Dearborn, Michigan. It has been developed pursuant to **Part I Section B of the facility's National Pollutant Discharge Elimination System Permit No. MI0043524 (NPDES permit)**. This document describes the structural and operational characteristics of the facility, identifies significant materials that could potentially affect storm water, identifies best management practices (BMP) and pollution control measures in place to reduce the potential for discharge of significant materials into storm water, and provides for periodic review and update of this SWPPP. A copy of the NPDES permit for Dearborn Works is included in Appendix D.

The purpose of this SWPPP is to improve the quality of surface waters through the reduction of pollutants potentially discharged in storm water runoff. In keeping with that purpose, this SWPPP has been developed to:

- identify potential sources of polluting materials in the storm water discharge at Dearborn Works;
- describe structural and non-structural control measures that are to be used at Dearborn Works;
- and provide other elements such as, but not limited to, a facility inspection program, site compliance evaluation program, and a record keeping and reporting program that will aid Dearborn Works in complying with the terms and conditions of its NPDES permit.

This SWPPP complements other Dearborn Works contingency and pollution prevention plans.

2.0 GENERAL FACILITY DESCRIPTION

Name of Facility: Cleveland-Cliffs Steel Corporation Dearborn Works
(Dearborn Works)

Facility Address: 4001 Miller Road
Dearborn, Michigan 48120

Facility Location: Latitude 42.291389
Longitude 83.155556

Mailing Address: 4001 Miller Road
P.O. Box 1699
Dearborn, MI 48120

Name & Address of Owner: Cleveland-Cliffs Steel
Corporation
9227 Centre Pointe Drive
West Chester Township, OH 45069

Name & Address of Operator: Cleveland-Cliffs Steel
Corporation Dearborn
Works 4001 Miller Road
P.O. Box 1699
Dearborn, MI 48120

Facility Contact: James E. Earl
Area Manager Environmental
O: (313) 845-3217
M: (313) 523-6848

Type of Facility (Industrial Activity): Iron and Steel Mills
(SIC 3312 / NAICS 33111)

**Certified Industrial Storm Water Operator(s),
Certification No. – Expiration Date:** Andrew Kelly, I-14787 – July 1, 2027
Jeff M. McCutcheon, I-11847 – July 1, 2028

NPDES Permit Number: MI0043524

Permit Type: Individual

Effective Date of Coverage: February 1, 2015

Expiration Date: October 1, 2016

NPDES Monitoring Points: 12 (001A, 001B, 002A, 002B, 002C, 04B1, 004B,
004C1, 004C, 004D, 04E0, & 006A)

**Total Number of Outfalls Discharging to
Receiving Water:** 7 (001A, 002A, 004B, 004C, 004D, 04E0, &
006A)

Receiving Water(s): Rouge River

2.1 STORM WATER POLLUTION PREVENTION TEAM

The storm water pollution prevention team is responsible for implementing, maintaining, and revising this SWPPP. The members of the team are familiar with the management and operations of Dearborn Works. The members of the team are familiar with the management and operations of Dearborn Works. The members of the team are as follows:

- 1) James E. Earl, P.E.
Area Manager Environmental
Telephone: (313) 845-3217
jim.earl@clevelandcliffs.com
- 2) Andrew Kelly
Environmental Engineer
Telephone: (313) 920-3480
andrew.kelly@clevelandcliffs.com
MI Certified Industrial Storm Water Operator No. I-14787
- 3) Jeff M. McCutcheon
Sr. Environmental Engineer
Telephone: (313) 323-1260
jeff.mccutcheon@clevelandcliffs.com
MI Certified Industrial Storm Water Operator No. I-11847

2.2 STORM WATER DRAINAGE AT THE FACILITY

Storm water at Dearborn Works is almost entirely collected and drained by a network of structural conveyances, mainly consisting of catch basins and gravity sewers. The network of storm sewers depicted in Appendix A, Figure 4 – Site Utility – Storm Sewers Map (Drawing No. 2004-GF-003), identifies the drainage areas for this SWPPP. It should be noted that some areas of drainage overlap exist, in which the areas of overlap appear to be drained by two sewer systems. In such cases, both drainage areas, and consequently discharge outfalls, could be impacted by a storm water exposure to significant materials in the area of overlap.

Site drainage areas are depicted in Appendix A, Figure 3 – Oil and Polluting Material Storage Location. See Appendix A, Figure 5 – Surface Type Map for an outline of the impervious and other surface type areas. Surface types are also discussed in each drainage area section. Facility outfalls are summarized in Section 13.0 Table 1 – Surface Water Outfalls.

2.3 IDENTIFICATION OF SIGNIFICANT MATERIALS

Significant materials, as defined under 40 CFR 122.26(b)(12), were identified through facility inspections, interviews with facility personnel and contractors, and review of the Spill Prevention, Control, and Countermeasures (SPCC)/Pollution Incident Prevention (PIP) Plan for the facility. A list of the identified significant materials for the facility that have a potential to be exposed to storm water is presented in Section 13.0 Table 2 – Significant Materials List. Significant materials managed in each drainage area at the facility are discussed in more detail in Section 3.0 – Facility Drainage Areas.

2.4 SPILL, LEAK, AND RELEASE HISTORY

The NPDES permit requires that the Dearborn Works SWPPP include a listing of significant spills and leaks of polluting materials that occurred at areas that are exposed to precipitation or that otherwise discharge to a point source at the facility. The listing must include spills that occurred over the three (3) years prior to the effective date of the permit. The listing must include the date, volume, and exact

location of the release and the action taken to clean up the material and/or prevent exposure to runoff or contamination of the surface waters of the state. Any release that occurs after the SWPPP has been developed, shall be controlled in accordance with the SWPPP, and is cause for the SWPPP to be updated as appropriate within 14 calendar days of obtaining knowledge of spill or loss.

Spill History is available in the Environmental Incident Log maintained by Environmental Affairs Department. The Log includes all the required information, a determination of whether SWPPP and/or other spill prevention and emergency response plans required updating and evidence that the necessary updates were performed within 14 calendar days of obtaining knowledge of the release if needed. See Table 3.0 – List of Significant Spills for a listing of significant spills that occurred at Dearborn Works over the past three years prior to the effective date of the permit.

3.0 FACILITY DRAINAGE AREAS

For purposes of this report, the portions of the site that are drained by structural storm water conveyances to point source discharges are divided into drainage areas, as depicted in Figure 5 – Surface Type Map. Each of these drainage areas is described in the following sections. It should be noted that all outdoor storage containers are kept closed and sealed. Piles of materials that may contribute significant dust or airborne particulates are addressed in the Pile Management Plan included in Appendix C. Implementation of the Pile Management Plan along with the Fugitive Dust Control Plan reduces the potential of discharges to storm water. Dearborn Works has outdoor transformers in various drainage areas including Polychlorinated Biphenyl (PCB), mineral oil and silicone transformers, which can be of a very low storm water exposure potential due to potential leaks. Transformers are not listed in this plan. A complete list of all transformers including outdoor ones is provided in the SPCC/PIP Integrated Plan.

3.1 DRAINAGE AREA 001 (NPDES MONITORING POINTS 001A)

Drainage Area 001 covers all portions of the facility discharging to Outfall 001. Outfall 001 discharges to the Rouge River at the western end of the facility from the Secondary Lagoon. Discharge from the outfall is limited and monitored in accordance with effluent limitations and monitoring requirements specified in the facility's NPDES permit.

3.1.1 AREA STORM WATER DRAINAGE

Drainage Area 001 is approximately **149** acres in size and includes portions of Dearborn Works' Cold Mill (*not currently operating, currently occupied by Logistics*), coil handling building, slab storage areas, Hot Strip Mill (*not currently operating*), Ford Motor Company *Dearborn Diversified Manufacturing Plant (Formerly* Frame Plant) and Tool and Die building. In addition, the Hot Dip Galvanizing Line, Band Staging, PLTCM, and Roll Shop buildings were put into service in 2011 in Drainage Area 001. A large portion of Drainage Area 001 is impervious, being covered by either buildings or pavement. All storm water within the drainage area is collected into the facility's storm sewer system and conveyed to the Schaefer Road Wastewater Treatment Plant (SRWWTP) for treatment before discharge to the Rouge River through Outfall 001.

3.1.2 EXPOSED SIGNIFICANT MATERIALS

Exposed significant materials identified within Drainage Area 001 are listed in Table 2 - Significant Materials List. The significant materials are typically stored in piles, tanks, drums, and containers. The specific materials in each of these storage categories are described in more detail below.

PILES

The following types of piles are typical in Drainage Area 001:

- Mill Scale
- Slag
- Mixed Debris
- Road Salt

All piles of significant materials stored in Drainage Area 001 are exposed to storm water with the exception of the Mill Scale piles that are partially covered by a building overhang. Implementation of the Pile Management and Fugitive Dust Control Plans reduces the potential of discharges to storm water.

TANKS

The following materials are typically stored in Drainage Area 001:

- Lubricants
- Scrap Oil
- Used Oil
- HCL
- Ferrous Chloride
- Acid Inhibitor

All outdoor tanks containing significant materials have secondary containment, including the tanks located in the Acid Tank Farm located near the PLTCM building.

DRUMS AND CONTAINERS

The following materials are typically stored in Drainage Area 001:

- Lubricating oils
- Grease
- Solvo Clean 75RS

3.1.3 NON-STORM WATER DISCHARGES

The Dearborn Works' NPDES permit allows the facility to discharge treated process wastewater, contact cooling water, non-contact cooling water, demineralized wastewater, filter backwash, cooling tower blowdown and boiler blowdown from Outfall 001 to the Rouge River in addition to storm water runoff. In addition, exempt non-storm water discharges from this drainage area may include discharges from fire-fighting activities, water from fire hydrant flushing, building and pavement wash water that does not use detergents or other compounds and where contamination by toxic and hazardous materials has not occurred, uncontaminated water condensate, and foundation drains that do not contact significant materials.

3.2 DRAINAGE AREA 002 (NPDES MONITORING POINT 002A)

Drainage Area 002 covers all portions of the facility discharging to Outfall 002. Outfall 002 discharges to the Rouge River at the southern end of the facility. Discharge from the outfall is limited and monitored in accordance with effluent limitations and monitoring requirements specified in the facility's NPDES permit.

3.2.1 AREA STORM WATER DRAINAGE

Drainage Area 002 is approximately 43 acres in size and includes Dearborn Works' former Electric Arc Furnace (EAF) shop, Continuous Casting Plant, Machine Scarfer Operation, and portions of the Ford Motor Company Frame Plant. Aside from the building roofs, most of Drainage Area 002 is gravel. Storm water runoff within the drainage area is collected into the facility's sewer system and conveyed to the Rouge River.

3.2.2 EXPOSED SIGNIFICANT MATERIALS

Exposed significant materials identified within Drainage Area 002 are listed in Table 2 - Significant Materials List. The significant materials are typically stored in piles, tanks, drums, and containers. The specific materials in each of these storage categories are described in more detail below.

PILES

The following types of piles are typical in Drainage Area 002:

- Slag Fines
- Mixed Debris
- Hot Briquetted Iron(HBI)

The piles of significant materials stored in Drainage Area 002 are stored on bare ground and exposed to storm water. However, the grounds are graded away from the Rouge River. Implementation of the Pile Management and Fugitive Dust Control Plans reduce the risk of potential discharges to storm water.

TANKS

The following materials are stored in tanks in Drainage Area 002:

- Used Oil
- Diesel Fuel
- Corrosion Inhibitors
- Polymer
- Sodium Hypochlorite

All tanks containing significant materials stored in Drainage Area 002 have secondary containment.

DRUMS AND CONTAINERS

The following materials are typically stored in drums and containers in Drainage Area 002:

- Used Oil
- Lubricants

- Hydraulic Fluids
- Hazardous Waste

All drums and containers of significant materials stored in Drainage Area 002 are exposed to storm water, with the exception of the Used Oil stored on the Facility-Wide Drum Storage Pad. The drums in this area are stored on a concrete pad under a building overhang with secondary containment.

3.2.3 NON-STORM WATER DISCHARGES

The facility's NPDES permit allows the facility to discharge treated non-contact process wastewater (including vacuum degassing and scarfing wastewater), contact cooling water, cooling water, cooling tower blowdown, and storm water runoff from Outfall 002 to the Rouge River. Exempt non-storm water discharges from this drainage area may include discharges from fire-fighting activities, water from fire hydrant flushing, building and pavement wash water that does not use detergents or other compounds and where contamination by toxic and hazardous materials has not occurred, uncontaminated water condensate, and foundation drains that do not contact significant materials.

3.3 DRAINAGE AREA 004B (NPDES MONITORING POINT 004B)

Drainage Area 004B covers the relatively small portion of the facility that discharges to Outfall 004B. Outfall 004B discharges to the Rouge River via the Ford Boat Slip. Drainage includes only storm water from the area immediately surrounding the Blast Furnace Wastewater Treatment Plant (BFWWTP). Discharge from the outfall is limited and monitored in accordance with effluent limitations and monitoring requirements specified in the facility's NPDES permit.

3.3.1 AREA STORM WATER DRAINAGE

Drainage Area 004B is approximately 1¹/₄ acres in size, much of which is impervious. The drainage area includes the blast furnace wastewater treatment plant (BFWWTP) and the area northeast of the Ford Boat Slip. All storm water within the drainage area is collected into the facility's storm sewer system (See Appendix A, Figure 4 – 2007 Storm Sewer System (Drawing No. 2004-GF-003)) and conveyed to the Rouge River via the Ford Boat Slip.

3.3.2 EXPOSED SIGNIFICANT MATERIALS

Exposed significant materials identified within Drainage Area 004B are listed in Table 2 – Significant Materials List. The significant materials managed in Drainage Area 004B are stored in piles and tanks. The specific materials in each of these storage categories are described in more detail below.

PILES

The following piles from the BFWWTP are typically stored in Drainage Area 004B:

- Wet Debris
- BF Filter Cake

The wet debris piles are stored within concrete containment structures. Implementation of the Pile Management and Fugitive Dust Control Plans reduce the risk of potential discharges to storm water.

TANKS

The following materials are stored in outdoor tanks in Drainage Area 004B:

- Diesel Fuel
- Gasoline Fuel
- Sodium Hypochlorite

All outdoor tanks have secondary containment. All other tanks containing significant materials are stored inside the BFWWTP building.

DRUMS AND CONTAINERS

Typically, there are no significant material drums or containers stored outside in Drainage Area 004B.

3.3.3 NON-STORM WATER DISCHARGES

The facility's NPDES permit allows the facility to discharge Blast Furnace recycle blowdown, boiler blowdown, and excess mill water in addition to storm water runoff from Outfall 004B to the Rouge River. Exempt non-storm water discharges from this drainage area may include discharges from fire-fighting activities, water from fire hydrant flushing, building and pavement wash water that does not use detergents or other compounds and where contamination by toxic and hazardous materials has not occurred, uncontaminated water condensate, and foundation drains that do not contact significant materials.

3.4 DRAINAGE AREA 004C (NPDES MONITORING POINT 004C)

Drainage Area 004C covers all portions of the facility discharging to Outfall 004C. Outfall 004C discharges to the Rouge River via the Ford Boat Slip. Discharge from the outfall is limited and monitored in accordance with effluent limitations and monitoring requirements specified in the facility NPDES permit.

3.4.1 AREA STORM WATER DRAINAGE

Drainage Area 004C is approximately 7¹/₂ acres in size and includes the Basic Oxygen Furnace (BOF) building and outdoor areas just west of the Ford Boat Slip. Over half of Drainage Area 004C is impervious. All storm water within the drainage area is collected into the facility's storm sewer system and conveyed to the Rouge River via the Ford Boat Slip.

3.4.2 EXPOSED SIGNIFICANT MATERIALS

Exposed significant materials identified within Drainage Area 004C are listed in Table 2 - Significant Materials List. The significant materials are typically stored in in area 004C are discussed below.

PILES

The following types of piles are typical in Drainage Area 004C:

- Slag
- Scrap Steel

The Road Salt pile is stored on bare ground but is typically covered with a plastic tarp. Slag and Scrap piles are stored on bare ground and exposed to storm water. However, implementation of the Pile Management Plan and Fugitive Dust Control Plan reduces the potential of discharges to storm water.

TANKS

The following materials are stored in outdoor tanks in Drainage Area 004C:

- Brine Water

The outdoor tank has *secondary containment*.

DRUMS AND CONTAINERS

There are typically no significant material drums or containers stored outside in Drainage Area 004C.

BOF AIR POLLUTION CONTROL DUST TRANSFER AREA

BOF air pollution control dust is transferred from the BOF electrostatic precipitator by a conveyor to a silo. From the silo, the dust is transferred to trucks for transport off-site. The silo is elevated and trucks are driven below the silo at a below grade station to receive the dust. The following storm water pollution prevention measures are implemented for this area:

- A storm drain and a storm drain manhole cover at the silo unloading station are sealed. Storm water that collects in the below grade dust loading area is removed by vacuum truck.
- A storm drain inlet located approximately 350ft north of the silo loading area is sealed.
- Cleveland-Cliffs has implemented a cleaning schedule of three times per week, when necessary, whereby dust losses from the transfer operation are removed from the area.
- Area roadways are swept with a street sweeper from March through October, subject to weather.

3.4.3 NON-STORM WATER DISCHARGES

The facility's NPDES permit allows the facility to discharge ladle-cleaning wastewater, non-contact cooling water, and boiler blowdown in addition to storm water runoff from Outfall 004C to the Rouge River. Exempt non-storm water discharges from this drainage area may include discharges from fire-fighting activities, water from fire hydrant flushing, building and pavement wash water that does not use detergents or other compounds and where contamination by toxic and hazardous materials has not occurred, uncontaminated water condensate, and foundation drains that do not contact significant materials.

3.5 DRAINAGE AREA 004D (NPDES MONITORING POINT 004D)

Drainage Area 004D covers a relatively small portion of the facility surrounding the Dearborn Works' Operations Warehouse and a portion of the Cold Mill which discharge to Outfall 004D. Outfall 004D discharges to the Rouge River via the Ford Boat Slip. Discharge from the outfall is limited and monitored in accordance with effluent limitations and monitoring requirements specified in the facility NPDES permit.

3.5.1 AREA STORM WATER DRAINAGE

Drainage Area 004D is approximately 4¹/₂ acres in size and about two-thirds of Drainage Area 004D is impervious. All storm water within the drainage area is collected into the facility's storm sewer system and conveyed to the Rouge River via the Ford Boat Slip.

3.5.2 EXPOSED SIGNIFICANT MATERIALS

Exposed significant materials identified within Drainage Area 004D are listed in Table 2 - Significant Materials List. The significant materials that are typically stored in area 004D are discussed below.

PILES

No significant materials are stored in piles in Drainage Area 004D.

TANKS

There are no significant material tanks typically stored in outside in Drainage Area 004D.

DRUMS AND CONTAINERS

There are typically no significant material drums or containers stored outside in Drainage Area 004D.

3.5.3 NON-STORM WATER DISCHARGES

The facility's NPDES permit allows the facility to discharge non-contact cooling water in addition to storm water runoff from Outfall 004D to the Rouge River. Exempt non-storm water discharges from this drainage area may include discharges from fire-fighting activities, water from fire hydrant flushing, building and pavement wash water that does not use detergents or other compounds and where contamination by toxic and hazardous materials has not occurred, uncontaminated water condensate, and foundation drains that do not contact significant materials.

3.6 DRAINAGE AREA 004E (NPDES MONITORING POINT 04E0)

Drainage Area 004E covers all portions of the facility discharging to Outfall 04E0 via the Roulo Creek Enclosure. Outfall 04E0 discharges to the Rouge River via the Ford Boat Slip, which shares discharges from Ford Motor Company Assembly WWTP covered under the NPDES permit issued to and maintained by Ford Motor Company.

Discharge from 04E0 is limited and monitored in accordance with effluent limitations and monitoring requirements specified in the facility's NPDES permit.

3.6.1 AREA STORM WATER DRAINAGE

Drainage Area 004E is approximately 4 ½ acres in size and includes the slag side of the "B" and "C" Blast Furnaces, the iron side of the "A", "B", and "C" Blast Furnaces, Gate 4 area, a portion of Dearborn Works Operations Warehouse, and the area immediately north of the boat slip. Most of Drainage Area 004E is impervious. All storm water within the drainage area is collected into the facility's storm sewer system (See Appendix A, Figure 4 – Site Utility – Storm Sewers Map (Drawing No. 2004-GF-003)) and conveyed to Roulo Creek via Outfall 04E0.

3.6.2 EXPOSED SIGNIFICANT MATERIALS

Exposed significant materials identified within Drainage Area 004E are listed in Table 2 - Significant Materials List. Drainage Area 004E includes portions owned by Ford Motor Company, that have outdoor storage such as used oil in tanks, hydraulic oils, water treatment cleaners, etc. that are managed by Ford in accordance with their NPDES permit requirements for storm water management. Significant materials managed by Cleveland-Cliffs Steel in Drainage Area 004E are described in more detail below.

PILES

No significant materials are stored in piles in Drainage Area 004E.

TANKS

The following materials are stored in outdoor tanks in Drainage Area 004E:

- Diesel Fuel

All outdoor tanks have sufficient secondary containment.

DRUMS AND CONTAINERS

There are typically no significant material drums or containers stored outside in Drainage Area 004E other than empty containers.

3.6.3 NON-STORM WATER DISCHARGES

The facility's NPDES permit allows the facility to discharge non-contact cooling water in addition to storm water runoff from Monitoring Point 04E0 to Outfall 004E via the Roulo Creek Enclosure. Exempt non-storm water discharges from this drainage area may include discharges from fire-fighting activities, water from fire hydrant flushing, building and pavement wash water that does not use detergents or other compounds and where contamination by toxic and hazardous materials has not occurred, uncontaminated water condensate, and foundation drains that do not contact significant materials.

3.7 DRAINAGE AREA 006 (NPDES MONITORING POINT 006A)

Drainage Area 006 covers portions of the facility discharging to Outfall 006. Outfall 006 discharges to the Rouge River at the southern end of the facility. Discharge from the outfall is limited and monitored in accordance with effluent limitations and monitoring requirements specified in the facility's NPDES permit.

3.7.1 AREA STORM WATER DRAINAGE

Drainage Area 006 is approximately 28 acres in size and includes a portion of parking lots and buildings that are not in use. It includes a cooling water system by Gate 3 that is owned, operated, and maintained by Dearborn Industrial Generation, LLC (DIG). About half of Drainage Area 006 is impervious, covered by either buildings or pavement. All storm water within the drainage area is collected into the facility's storm sewer system (See Figure 4 – Site Utility – Storm Sewers Map (Drawing No. 2004-GF-003) in Appendix A) and conveyed to the Rouge River.

3.7.2 EXPOSED SIGNIFICANT MATERIALS

Exposed significant materials identified within Drainage Area 006 are listed in Table 2 - Significant Materials List. Significant materials managed in Drainage Area 006 are stored in piles, tanks, drums, and containers. The specific materials in each of these storage categories are described in more detail below.

PILES

The following types of piles are typical in Drainage Area 006:

- Ore Fines

- Coke
- Coke Fines
- Slag
- Sand
- Mixed Debris
- Limestone
- Flue Dust
- Hot Briquetted Iron (HBI)
- Iron Ore Pellets

All piles of significant materials stored in Drainage Area 006 are exposed to storm water. However, implementation of the Pile Management Plan and Fugitive Dust Control Plan reduces the potential of discharges to storm water. Iron ore fields are drained of precipitation using pumps as necessary to reduce the saturation of the pellets. Water is filtered through a 100 micron filter prior to discharge to the storm sewer system. This filter is changed out when differential pressure alarms signal the filter is clogged.

TANKS

The following materials are stored in tanks in Drainage Area 006:

- DIG Cooling Tower and Water Treatment Chemicals
- Diesel Fuel
- Sodium Hypochlorite

All tanks containing significant materials stored in Drainage Area 006 have adequate secondary containment.

DRUMS AND CONTAINERS

The following materials are typically stored in drums and containers in Drainage Area 006:

- Lubricants
- Hydraulic Fluids
- Used Oil (covered with overhang)
- Bagged Salt

All drums and containers of significant materials stored in Drainage Area 006 are exposed to storm water, with the exception of the drums stored on a concrete pad under a building overhang by "A" Blast Furnace. Bagged salt is also present.

3.7.3 NON-STORM WATER DISCHARGES

The facility's NPDES permit allows the facility to discharge noncontact cooling water, treated process wastewater, cooling tower blowdown and miscellaneous low volume wastewaters including demineralizer regeneration wastewater and boiler blowdown in addition to storm water runoff from Outfall 006. Exempt non-storm water discharges from this drainage area may include discharges from fire-fighting activities, water from fire hydrant flushing, building and pavement wash water that does not use detergents or other compounds and where contamination by toxic and hazardous materials has not occurred, uncontaminated water condensate, and foundation drains that do not contact significant materials.

3.8 FACILITY NO-DRAINAGE/NO POINT SOURCE DISCHARGE AREAS (NO NPDES MONITORING POINTS/OUTFALLS)

This includes areas of the facility wherein the existing structural storm water conveyances no longer function, or where conveyances simply do not exist. Lacking structural storm water conveyances, most storm water in these areas collect in low areas and is absorbed by the soil. Those areas have no identified permitted monitoring points or outfalls.

3.8.1 AREA STORM WATER DRAINAGE

Dearborn Works' No-Drainage/No Point Source Discharge Areas includes the following:

- Levy area on the south side of the plant;
- Limestone bin storage on the east side of the Ford Boat Slip;
- outdoor pile storage on the east side of the Ford Boat Slip;
- pile storage area and contractor's parking lot on the northeast corner of the Miller Road and Dix Avenue intersection.
- *Jefferson Intake property at the southeast corner of West Jefferson Avenue and Dearborn Street*

3.8.2 EXPOSED SIGNIFICANT MATERIALS

Exposed Significant Materials identified in these areas during the facility inspections are listed in Table 2 - Significant Materials List and are marked on the map as applicable. The following piles were observed:

- Coke (Boat Slip Area)
- Iron Ore Pellets (Boat Slip Area)
- Limestone (Boat Slip Area)
- Slag (Boat Slip Area)
- Iron Fines
- Coke Fines
- Mixed Debris
- Scrap Metal Piles
- Hot Briquetted Iron(HBI)

Most of the storage piles of significant materials stored in the Ford Boat Slip area are stored within the bin area. Storage piles on the east side of the Ford Boat Slip are directly exposed to storm water. Implementation of the Pile Management Plan and Fugitive Dust Control Plan reduce the risk of

potential discharges to storm water.

Levy is responsible for ensuring structural controls (i.e. berms) are in place and maintained to minimize any non-point source run-off from their area. Dearborn Works will visually inspect the area during monthly pile inspections and quarterly comprehensive site inspections to ensure compliance, and that operations and activities follow the guidelines of the permit.

TANKS

The following materials are stored in tanks at the Jefferson Intake property:

- *Sodium Hypochlorite*

All tanks containing significant materials stored at the Jefferson Intake property have adequate secondary containment.

3.8.3 NON-STORM WATER DISCHARGES

Non-storm water discharges are not covered by Dearborn Works' NPDES permit, as they are not point discharge areas. Exempt non-storm water discharges from these drainage areas may include discharges from fire-fighting activities, water from fire hydrant flushing, building and pavement wash water that does not use detergents or other compounds and where contamination by toxic and hazardous materials has not occurred, uncontaminated water condensate, and foundation drains that do not contact significant materials. No Significant Materials are anticipated to be contained within the discharge area.

4.0 REASONABLE POTENTIAL TO CONTRIBUTE TO RUN-OFF

The following areas and/or activities were evaluated with respect to the reasonable potential for contribution of significant materials exposure to storm water.

- Loading, Unloading, and Other Significant Material Handling Operations – Loading, unloading and material handling procedures are implemented at Dearborn Works to reduce the potential for spills during handling of any significant materials.
- Outdoor Storage Including Secondary Containment Structures – Outdoor storage and potential exposure is covered under Section 3.0 Facility Drainage Areas above. Implementation of the Pile Management Plan and Fugitive Dust Control Plan, among other structural and non-structural control measures, reduces the potential of discharges to storm water because of outdoor storage.
- Outdoor Manufacturing and Processing Activities – No outdoor manufacturing activities are conducted at Dearborn Works.
- Significant Dust and Particulate Generating Processes – Piles of materials that may contribute significant dust or airborne particulates are addressed in the Pile Management Plan (Appendix C). Permitted process air emissions containing particulates are addressed in the Discharge from Vents, Stacks, or Air Emission Controls section below. The BOF air pollution control dust transfer area is addressed in Section 3.4.2. The Fugitive Dust Control Plan addresses dust management of paved and unpaved roads.
- Discharge from Vents, Stacks or Air Emission Controls – Air emission permit documentation consists of the Title V Renewable Operating Permit and other individual permits to install (PTI). The permits provide a complete inventory of potential emissions sources. These potential sources and methods of control are addressed and managed under the permits.
- On-Site Waste Disposal Practices – No on-site waste disposal operations are conducted at

Dearborn Works.

- Maintenance and Cleaning of Machines or Equipment – This type of activity does not occur on a regular basis or in particular locations at the facility. Therefore, it is not expected to have a significant impact on storm water quality.
- Sites of Exposed or Erodible Soils – Several areas of good soil erosion potential exist at Dearborn Works that can potentially contribute to storm water runoff. Potential erosion from these areas has been controlled through the sediment and erosion control methods identified in Section 7.0 Non-Structural Control Measures under non-structural control measures in addition to structural control measures in place (e.g. grading, curbing, etc.).
- Site of Environmental Contamination Listed Under Part 201 (Environmental Response) of NREPA – No active sites of environmental contamination listed under Part 201 of Michigan NREPA are known to exist at Dearborn Works. However, the Rouge River at the Schaefer Highway Bridge is listed as a Part 201 site for lead, cyanide, and PCB contamination.
- Areas of Significant Material Residues – All areas of significant material residues that may contribute to storm water runoff are addressed under other sections of this plan.
- Areas Where Animals (Wild or Domestic) Congregate and Deposit Wastes – There are no known areas at Dearborn Works where animals (wild or domestic) congregate and deposit waste.
- Other Areas Where Storm Water May be Exposed to Significant Materials – No other known areas at Dearborn Works than those addressed in Section 3.0 Facility Drainage Areas.

5.0 TOTAL MAXIMUM DAILY LOAD REQUIREMENTS

The facility's NPDES permit requires Dearborn Works to determine if the facility discharges storm water to a water body for which an EPA-approved Total Maximum Daily Load (TMDL) has been established. If so, the permit requires Dearborn Works to assess whether the TMDL requirements for the facility's discharges are being met through implementation of the existing SWPPP or whether additional control measures are necessary.

Two EPA-approved TMDLs are established for the Rouge River: one for *E. coli* and one for biota/suspended sediment:

- *EGLE, Water Resources Division, July 2019, Michigan Statewide E. coli Total Maximum Daily Load*
- EGLE, Water Bureau, August 2007, TMDL for Biota for the River Rouge Watershed, including Bishop and Tonquish Creeks, Washtenaw, Wayne and Oakland Counties

EGLE replaced the Rouge River watershed-specific E. coli TMDL with the statewide E. coli TMDL in 2019. Sanitary wastewater from the facility is directed to the Detroit Water and Sewerage Department. This TMDL does not affect the facility's SWPPP or storm water control measures.

In the biota/suspended sediment TMDL, the facility was included as part of the NPDES non-storm water loading calculations and a loading reduction for this category of discharges is not part of the TMDL (see Tables 4 and 5 of the TMDL document). Consequently, this TMDL does not affect the facility's SWPPP or storm water control measures.

6.0 NPDES MONITORING PARAMETERS

Dearborn Works' NPDES permit establishes discharge limits for total flow and concentration and loading specifications for specific constituents, and allows for an unspecified amount of storm water

runoff from monitoring points. The permit requires monitoring at thirteen (13) locations for these parameters on a variable schedule. The monitoring data is then submitted monthly to EGLE through the *MiEnviro Portal* web-based permitting and compliance database (DMR). Electronic and hard copies of monthly DMRs are maintained by the Environmental Affairs Department.

7.0 NON-STRUCTURAL CONTROL MEASURES

Dearborn Works has implemented non-structural controls and BMPs to prevent significant materials from contacting storm water during routine operations. Existing control measures and BMPs include the following:

- 1) Routine Inspections and Preventive Maintenance Programs
- 2) Housekeeping Practices
- 3) Quarterly Comprehensive Site Inspection
- 4) Significant Material Storage and Handling Procedures
- 5) Spill Prevention and Response Procedures
- 6) Sediment and Erosion Control Practices
- 7) Employee Training Programs
- 8) TMDL Requirements
- 9) List of Significant Materials Still Present

Sections 7.1 through 7.9 provide general descriptions of these categories.

7.1 ROUTINE INSPECTIONS AND PREVENTATIVE MAINTENANCE PROGRAMS

The preventive maintenance program at Dearborn Works involves periodic timely inspection, testing, and maintenance or calibration of all facility equipment and systems whose failure or deterioration has the potential of exposing or discharging significant materials to storm water.

Preventive maintenance, inspections, and where appropriate, testing and calibrations or maintenance includes, but is not limited to, the following areas and equipment:

- Storm water conveyances such as drain inlets, catch basins, and sewer junction manholes are scheduled to be inspected monthly for obstructions, and cleared or cleaned as needed.
- Tanks and container storage areas used for storage of significant materials as described in Section 3.0 Facility Drainage Areas of this plan are inspected on a monthly basis for leakage of materials and repaired as needed.
- Piles of significant materials will be scheduled for inspection according to Dearborn Works' Pile Management Plan (Appendix C).
- Secondary containment structures for the above tanks are inspected monthly for leakage or overflow of significant materials or collected storm water. Water or significant materials in the containment structure is pumped out and properly disposed.

7.2 GOOD HOUSEKEEPING PRACTICES

At Dearborn Works, efforts are undertaken to maintain a clean, orderly, and safe work environment. Routine good housekeeping practices and activities are implemented at the facility at areas that may contribute pollutants to storm water discharges, minimizing their storm water pollution potential.

7.3 QUARTERLY COMPREHENSIVE SITE INSPECTION

As required by Dearborn Works' NPDES permit, the Certified Storm Water Operator must conduct quarterly comprehensive site inspections. At a minimum, one inspection shall be performed within each of the following quarters: January-March, April-June, July-September, and October-December. In addition to the areas and equipment described in the preventive maintenance program, the following areas are to be included in the inspection:

- Facility grounds
- Parking lots (paved and unpaved)
- Trash dumpsters and other waste storage areas
- Outdoor storage areas
- Significant material storage areas
- Structural pollution prevention controls
- Equipment exposed to storm water or storm water runoff

The inspection results and report will be documented using the Quarterly SWPPP Comprehensive Inspection Form included in Appendix B. The completed form/report shall include:

- updates on corrective actions implemented due to previously identified pollutant and/or discharge issues;
- any evidence of, or the potential for, pollutants to discharge to the drainage system or receiving waters and the condition of and around the discharge point including flow dissipation measures needing maintenance or repairs;
- any control measures needing maintenance or repairs; and
- any additional control measures needed to comply with permit requirements.

In addition, the form/report will include:

- any required revisions to the SWPPP resulting from the inspection; and
- a written certification stating the facility complies with this permit and the SWPPP, or, if there are instances of noncompliance, they are identified and corrective actions are developed and implanted accordingly.

These forms/reports should be retained in the Environmental Affairs Department for at least three years from the date of the inspection.

7.4 SIGNIFICANT MATERIAL STORAGE AND HANDLING PROCEDURES

At Dearborn Works, the handling and storage of materials, which could potentially affect storm water is done in accordance with documented environmental work instructions and procedures to reduce the potential for spills or contamination of storm water. These documents define the material handling and storage criteria that ensure conformance with Dearborn Works' own internal standards, and compliance with Federal and State environmental regulations. Documented spill prevention and response procedures also exist as part of Dearborn Works' Environmental Management System (EMS). Additional procedures and work instructions may be developed, as necessary, to control the storage and handling of significant materials.

7.5 SPILL PREVENTION AND RESPONSE PROCEDURES

In the event of a spill of significant materials, Environmental Affairs has developed spill response procedures as well as the procedures defined by the facility's EMS emergency and spill response procedures, SPCC/PIP and/or the facility's Hazardous Waste Contingency Plan shall be implemented.

7.6 SEDIMENTATION AND SOIL EROSION CONTROL

Dearborn Works has a Pile Management Plan (Appendix C), which addresses the management, maintenance, and inspection of the bulk solid materials used at Dearborn Works, which have a high potential of sedimentation and soil erosion. This plan also addresses dust and/or other airborne particulate matter from the bulk solid materials. Air emissions are also addressed under the facility's Title V Renewable Operating Permit as well as the Fugitive Dust Control Plan. The condition of these areas and effectiveness of the implemented controls will be monitored during quarterly comprehensive site inspections in addition to informal inspections and daily observation. Storm water control measures for the BOF air pollution control dust transfer area are identified in Section 3.4.2.

7.7 EMPLOYEE SWPPP TRAINING PROGRAMS

A training program has been implemented to train Dearborn Works' employees and contractors with job responsibilities related to the handling of significant materials and storm water control of important aspects of this plan. Topics covered during new orientation and refresher training are to include:

- Purpose of SWPPP
- Members of the Storm Water Pollution Prevention Team
- Team Contact Information
- Spill Prevention and Response.
- Good Housekeeping Practices.
- Preventive Maintenance Schedule and Responsibilities, if any.

Periodic refresher courses or notices are given annually in conjunction with ISO 14001 EMS training. In the event changes or updates are made to the SWPPP, training on the new or updated elements of the SWPPP will be provided to affected employees within 60 days. When applicable, Dearborn Works Environmental Affairs Department or Operating Departments shall select the employees with job responsibilities related to significant materials management and storm water control for training.

All employee-training records associated with the SWPPP are maintained by the Environmental Affairs Department and/or Training Department.

7.8 TMDL REQUIREMENTS

No further actions are specifically needed beyond what is listed in this plan in order to comply with TMDL requirements applicable to the Rouge River, the receiving water body of Dearborn Works' water discharges, as mentioned above in Section 5.0 Total Maximum Daily Load Requirements.

7.9 LIST OF SIGNIFICANT MATERIALS STILL PRESENT

After the implementation of the non-structural controls, the following significant materials are expected to be present in the storm water discharge from the corresponding drainage areas:

Significant Materials	Drainage Area(s) / Outfall(s)
Traces of oils and grease	Drainage Area 001
Sediments	Drainage Areas 002, 004, and 006

8.0 STRUCTURAL CONTROL MEASURES

Structural control measures will be necessary to control any pollutants that are still present in the storm water after the non-structural controls have been implemented. These types of controls are physical features that control and prevent storm water pollution. They can range from preventive measures to collection structures to treatment systems. Structural controls require construction of a physical feature or barrier.

Existing structural controls at Dearborn Works are depicted in Appendix A, Figure 2 – Dearborn Works General Location Map (Adopted from *Dearborn, MI USGS Quadrangle*) where applicable and include secondary containment areas for outdoor storage tanks and containers. Secondary containment areas for oil tanks are concrete, asphalt, or steel. They are sized for the largest single tank plus an allowance for precipitation and are impervious to the oils stored in the tanks. Specific details regarding the design of engineered containment areas required at the facility are maintained as part of the Dearborn Works’ PIPP and SPCC plan.

Other structural controls include asphalt roads along the boat slip area and perimeter of the site. A combination of jersey barriers and erosion eels have been installed along the road on the west side of the boat slip that also wraps around the autoscarfing building along the edge of the Rouge River. These roads have also been graded to contain any storm water runoff on-site. Asphalt curbs also contain some outdoor storage areas along River Front Road. Other storage piles are contained within a permanent building structure along the boat slip area. Controls for the BOF air pollution control dust transfer area are identified in Section 3.4.2.

The SRWWTP and associated retention ponds act as a structural control for incidental storm water runoff from Drainage Area 001.

Existing structural controls shall be inspected and maintained in accordance with the programs and procedures outlined in Section 7.1 Routine Inspections and Preventative Maintenance Programs of this document, the Pile Management Plan for the facility and those specified in the SPCC and PIPP plans.

9.0 SWPPP REVIEW AND UPDATE

As required by the permit conditions, the Certified Storm Water Operator is required to review this plan at least on an annual basis and maintain written report of the review. Based on the review, the permittee or the Industrial Storm Water Certified Operator shall amend the SWPPP as needed to ensure continued compliance with the terms and conditions of this permit. The written report shall be submitted via *MiEnviro Portal* on or before January 10 of each year. The report consists of ten questions that should be answered after reviewing the SWPPP checklist located on the WRD Industrial Storm Water website. The General Manager of Dearborn Works must submit the report after it is complete.

This SWPPP shall be updated or amended whenever changes at the facility have the potential to increase the exposure of significant materials to storm water, significant spills occur at the facility, or when the SWPPP is determined by the permittee or EGLE to be ineffective in achieving the general

objectives of controlling pollutants in storm water discharges associated with industrial activity. Updates based on increased activity or spills at the facility shall include a description of how the permittee intends to control any new sources of significant materials, or respond to and prevent spills in accordance with the requirements of this permit. Updates to the SWPPP resulting from spill or release will be completed as appropriate within 14 calendar days of obtaining knowledge of the spill or loss.

10.0 RECORDKEEPING AND REPORTING

All preventive maintenance inspections, quarterly comprehensive site inspections, employee training records, and annual reports shall be retained at the Dearborn Works facility for a period of at least three years. These records will be made available, upon request, to EGLE.

Part I.B.8 of Dearborn Works' NPDES permit requires that records of all inspection and maintenance activities, as well as records of all spills and releases, be kept on file for three years. To satisfy this requirement, the following report forms have been developed:

- An **Environmental *Spill* Log** listing the date of spill, the spill location, the type, and volume of material spilled, the cause of the spill, the corrective action taken, and the agencies or persons contacted.
- An employee training record listing the time and date of the training session, the nature and signature of the trainer, the name and signatures of the employees attending the session, and a list of topics offered during the session.
- A preventive maintenance inspection report listing the date and time of the inspection, the name and signature of the inspector, and a list of areas inspected, observations made and actions taken, if any, at each area.
- A quarterly comprehensive inspection form/report listing all the areas to be inspected and any findings. This quarterly report identifies any area(s) not in compliance with the SWPPP or permit conditions.

Examples of the forms to be used for these reports are included in Appendix B.

11.0 CERTIFICATION OF THE SWPPP

The permit requires that the SWPPP shall be reviewed and signed by the Certified Storm Water Operator(s) and by either the permittee or an authorized representative in accordance with 40 CFR 122.22. The SWPPP shall be retained on-site at the facility that generates the storm water discharge.

I certify under penalty of law that this SWPPP has been developed in accordance with good engineering practices. To the best of my knowledge and belief, the information submitted is true, accurate, and complete. In addition, at the time this plan was completed, no unauthorized discharges were present. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations.



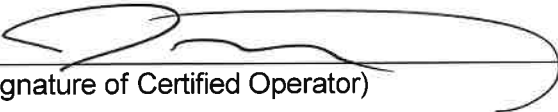
(Signature of Certified Operator)

Andrew C. Kelly

(Printed Name)

I-14787
(Certification Number)

1/17/2024
(Date)



(Signature of Certified Operator)

Jeff M. McCutcheon

(Printed Name)

I-11847
(Certification Number)

1/17/24
(Date)



(Signature Permittee)

Taylor Murphy, General Manager

(Printed Name & Title)

01/18/2024
(Date)

12.0 SWPPP REVISIONS LOG

DATE OF REVISION	Revision Number	DESCRIPTION
April 2, 2012	00	Updated plan to reflect changes in exposure sources.
September 01, 2015	01	Updated plan to reflect changes in exposure sources and include new NPDES permit. Added a new certified storm water operator, changed operator and made few updates to the tables and map. Changed formatting as well.
August 29, 2018	02	Update storm water certified operator. Changed scarfing grit pile located in area 002 to outside from inside along with storm water contact potential and risk to reflect new location. Changed formatting as well.
October 05, 2018	03	Updated stormwater Operator Certification expiration date, remove outfall 002D.
August 23, 2019	04	Update SWPPP review and update portion to reflect updated submission method to include MiWaters. Changed MDEQ to EGLE.
October 2, 2019	05	Amended SWPPP to address BOF air pollution control dust transfer area. Updated permittee signature page. Updated storm sewer map and Oil and Pollution Materials map. Removed Appendix E and F.
June 24, 2020	06	Add structural control description for jersey barriers and erosion eels on page 18. Add Figure 6.
July 23, 2020	07	Fix Page numbers.
September 07, 2021	08	AK Steel to Cleveland-Cliffs Steel Corporation. Update tanks and piles for each drainage area. Update significant materials list.
November 18, 2021	09	Remove iron ore pellet piles from non-discharge category and add to piles of exposed materials to Outfall 006A drainage area.
October 12, 2022	10	Updated waste water engineer info and cert number throughout procedure. Updated environmental manager title throughout procedure.
January 12, 2024	11	Updated Plant Manager to Taylor Murphy. Updated Storm Water Operator expiration dates for Andrew & Jeff, Changed Environmental Incident Log to Environmental Spills Log. Updated pile locations and contents, MiWaters to MiEnviro Portal, significant materials table, updated TMDLs.

13.0 TABLES

TABLE 1 – SURFACE WATER OUTFALLS			
MAJOR OUTFALLS AND MONITORING LOCATIONS	CONTRIBUTING MINOR OUTFALLS (MONITORING LOCATIONS)	EFFLUENT TYPE	IDENTIFIED IN PERMIT
001 (001A)	001B	STORM & PROCESS	YES
002 (002A)	002B 002C	STORM & PROCESS	YES
004B	04B1	STORM & PROCESS	YES
004C	04C1	STORM & PROCESS	YES
004D		STORM & PROCESS	YES
04E0		STORM & PROCESS	YES
006 (006A)	006A	STORM & PROCESS	YES

TABLE 2 – SIGNIFICANT MATERIALS LIST

SIGNIFICANT MATERIAL DESCRIPTION	APPROXIMATE VOLUME OR PILE HEIGHT	LOCATION	POTENTIAL MODE OF STORM WATER EXPOSURE	RISK
<i>DRAINAGE AREA 001:</i>				
Mill Scales & Mill Scale Debris	Varies	HSM Finishing Mill & Roughing Mill Scale Pits Area	Contact with storage piles; Contact with track outs; Spillage during handling	High
Petroleum Distillates	150 gal AST	Outside West Side of Building by B-68	Spillage during handling and tank leaks	Low
Lubricants/Lubricating Oils (Quinto lubric) <i>*No longer in service</i>	500 gal AST (3) 5,000 gal ASTs	Southwest of HSM Building East wall of HSM Building	Spillage during handling; piping and tank leaks	Low
Oil & Lubricants filling ports <i>*No longer in service</i>	4x filling ports	East wall of HSM Building	Spillage during loading; piping and tanker leaks	Low
Gas cylinders	N/A	Gate M4 east of HDGL Building	Spillage during handling; container leak	Low
Zinc Dross Slabs	N/A	Gate M4 east of HDGL Building	Contact with storage piles	High
Grease	~ 50,000 lbs.	HSM Oil Storage Area (between Scale Pits), Grease House	Spillage during handling; container leak; Contact with track outs;	Medium
Solvo Clean 75 RS (Sodium Metasilicate-Ethylene Glycol Monobutyl Ether mixture)	(10-20) 55 gal (4) 330 gal	HSM Oil Storage Are (between Scale Pits)	Spillage during handling; container leak	Low
Mill Cleaner 301-SH (Ethylene Glycol Monobutyl Ether)	(2) 275 gal	HSM Oil Storage Are (between Scale Pits)	Spillage during handling; container leak	Low
Oils & Lubricants drums & totes	(5-10) 55 gal (2-4) 275 gal	HSM Oil Storage Are (between Scale Pits)	Spillage during handling; container leak	Low
Diesel Fuel	500 gal AST	Between Scale Pits	Spillage during handling; container leak	Low
Slag pile for roadway maintenance	~ 5' high	Varies	Contact with storage piles	High
Hydrochloric Acid (PLTCM ATF)	(5) 25,000 gal	PLTCM Acid Tank Farm	Spillage during handling; leaks from pipes;	Low
Ferrous Chloride (Spent Pickle Liquor)	(5) 25,000 gal	PLTCM Acid Tank Farm	Spillage during handling; leaks from pipes;	Low
Acid Inhibitor	12,000 gal	PLTCM Acid Tank Farm	Spillage during handling; leaks from pipes;	Low
Diesel Fuel	3,000 gal AST	Outside Emergency Generator North West Corner of HDGL	Spillage during handling; container leak	Low

TABLE 2 – SIGNIFICANT MATERIALS LIST

SIGNIFICANT MATERIAL DESCRIPTION	APPROXIMATE VOLUME OR PILE HEIGHT	LOCATION	POTENTIAL MODE OF STORM WATER EXPOSURE	RISK
Salt Pile	10' high	Inside Old Soaking Pit Building	Contact with storage piles	Low
DRAINAGE AREA 002:				
Hot Briquetted Iron(HBI)	~ 15' high	Scarfig Building (outside)	Contact with storage piles	High
UN 1405, Tox No. 200336 (Calcium silicide)	(13) 500 gal	By Ladle Haul Rd	Spillage during handling; container leak	Low
Basic Oxygen Furnace scrap metal bales	Varies	Southeast Corner of Drainage Area 002 near BOF	Contact with storage piles	High
Scrap Piles	Varies	Varies	Contact with storage piles	High
Used Oil & Solid / Hazardous Waste Drums & Totes	(10-20) 55 gal (5-10) 275 gal	J-9 90-Days Drum Pad / Storage Area	Waste handling and disposal; container leak	Low
Oil & Oher Product Drums (Outdoor usage)	Varies	Varies	Waste handling and disposal; container leak	Low
Diesel Fuel Tanks	2,000 gal / 500 gal	South of BOF Lab by G-9	Spillage during handling; leaks from pipes; leaks from ASTs	Low
Corrosion Inhibitors	(2) 4,000 gal	CC Area - Southside near Cooling Tower (H-7)	Spillage during handling; piping and tank leaks	Low
Polymer	4,200 gal	CC Area - Southside near Cooling Tower (H-7)	Spillage during handling; piping and tank leaks	Low
Sodium hypochlorite (12.5%)	4,200 gal	CC Area - Southside near Cooling Tower (H-7)	Spillage during handling; piping and tank leaks	Low
Superplex Lubricant totes	(8-10) 500 gal	West Side of Caster	Spillage during handling; container leak	Low
Oily Water	(2) 25,000 gal (2) 6,000 gal	Scale Pits: Northwest Side Caster	Spillage during handling & loading/unloading, piping and tank leaks	Low
Caster drum storage area (Oils & lubricants)	(12-20) 55 gal	Northwest Side of Caster	Spillage during handling; container leak	Low
Slag piles	10' high	Southeast Corner of Drainage Area 002 near BOF	Contact with storage piles	High
Diesel & Gasoline Fuel Tanks	2-4x 500 gal	Changes (Contractor owned)	Spillage during handling; leaks from pipes; leaks from tank	Low

TABLE 2 – SIGNIFICANT MATERIALS LIST				
SIGNIFICANT MATERIAL DESCRIPTION	APPROXIMATE VOLUME OR PILE HEIGHT	LOCATION	POTENTIAL MODE OF STORM WATER EXPOSURE	RISK
<i>DRAINAGE AREA 004B:</i>				
Diesel Fuel	4,000 gal	East of Screen House (Main Pumping Station)	Spillage during loading/unloading; leaks from pipes; leaks from tank	Low
Diesel Fuel	500 gal	West of Pump house	Spillage during loading/unloading; leaks from pipes; leaks from tank	Low
Wet debris	10' high	South of BF WWTP	Contact with storage piles	High
BF Filter Cake	10' high	South of BF WWTP	Contact with storage piles	High
Sodium Hydroxide	12,000 gal	South Side of Pump Room / Splitter Box	Spillage during handling; piping and tank leaks	Low
Diesel & Gasoline Fuel Tanks	(2-4) 500 gal	Changes (Contractor owned)	Spillage during handling; leaks from pipes; leaks from tank	Low
<i>DRAINAGE AREA 004C:</i>				
Diesel Tank	500 gal	North of Ladle Cleaning Building	Spillage during handling; leaks from pipes; leaks from ASTs	Low
Brine Water Tank	8,000 gal	South of Ladle Cleaning Building / North of BOF	Spillage during handling; leaks from pipes; leaks from tank	Low
Runway Slag Pile	8' high	East side of BOF	Contact with storage piles	High
Scrap Pile	~15' - 20' high	East side of BOF	Contact with storage piles	High
Diesel & Gasoline Fuel Tanks	500 gal	Changes (Contractor owned)	Spillage during handling; leaks from pipes; leaks from tank	Low
<i>BOF air pollution control dust transfer area</i>	<i>N/A</i>	<i>West of BOF</i>	<i>Losses from conveyor and silo during transfer to trucks for off-site transport</i>	<i>High</i>
<i>DRAINAGE AREA 004D:</i>				
<i>None</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>None</i>

TABLE 2 – SIGNIFICANT MATERIALS LIST				
SIGNIFICANT MATERIAL DESCRIPTION	APPROXIMATE VOLUME OR PILE HEIGHT	LOCATION	POTENTIAL MODE OF STORM WATER EXPOSURE	RISK
<i>DRAINAGE AREA 004E:</i>				
Diesel Fuel	500 gal	BF Operations Area: East Side of Blast Furnace A/B mid-section	Spillage during handling; container leak	Low
Area includes portions owned by Ford Motor Company which have outdoor storage such as used oil in tanks , hydraulic oils, water treatment cleaners, etc. that are managed by Ford in accordance with their NPDES permit requirements for storm water management.				
<i>DRAINAGE AREA 006:</i>				
Coke & Coke Fine Piles	~ 10' – 15' high	Pile Storage Areas	Contact with storage piles	High
Ore Fine Piles	~ 10' high	Pile Storage Areas	Contact with storage piles	High
Flue Dust Piles	~ 10' high	Pile Storage Areas	Contact with storage piles	High
Hydraulic & Lubricating Oil Drums	(8) 55 gal	Maintenance Area South of Furnace A	Spillage during handling; container leak	Low
Diesel Fuel AST	~ 2,000 gal	South of Slag Pit	Spillage during handling; piping & tank leak	Low
Road Repair Slag	~5' high x 10 ft ²	<i>Various</i>	Contact with storage piles	High
Non-Hazardous Drums	5-10x 55 gal	Miscellaneous	Spillage during handling; container leak	Low
Sand Piles	~10' high x 60 ft ²	<i>Various</i>	Contact with storage piles	High
Mixed Debris Piles	~10' high x 150 ft ²	<i>Various</i>	Contact with storage piles	High
Limestone Piles	~10' high x 60 ft ²	<i>Various</i>	Contact with storage piles	High
Blast Furnace Filter Cake	5' high	<i>Various</i>	Contact with storage piles	High
DIG Cooling Water System Chemicals Empty Totes Sodium Hypochlorite Tank Sodium Bisulfide Tank	~30-40 10,000 gal 2,000 gal	DIG Cooling Water System / West of Pump Station by Gate 3	Spillage during handling; container leak (System & all relevant equipment are owned, operated & maintained by DIG)	Low
Sodium Hypochlorite Tank	~ 3,000 gal	North of Pump House by BF Offices	<i>Spillage during handling, tank leak</i>	Low
Hot Briquetted Iron(HBI)	~15' high	Pile Storage Areas	Contact with storage piles	High
Iron Ore Pellets	~50' high	Pile Storage Areas	Contact with storage piles	High
General Facility Ground with no Drainage Area (Levy, Boat Slip, North East corner of Miller Road and Dix Avenue intersection, etc.):				
Mixed Debris	Varies	Varies	Contact with storage piles	High
Diesel or Kerosene Portable Tanks	250 – 500 gal	Changes (Contractor owned)	Spillage during handling; tank leak	Low

TABLE 2 – SIGNIFICANT MATERIALS LIST

SIGNIFICANT MATERIAL DESCRIPTION	APPROXIMATE VOLUME OR PILE HEIGHT	LOCATION	POTENTIAL MODE OF STORM WATER EXPOSURE	RISK
Scrap Metal Piles	~ 10' – 20' high	Varies	Contact with storage piles	High
Levy Scrap BOF	8' high x 300 ft ²	Levy Area	Contact with storage piles	High
Coke Piles; Iron Fine Piles Flue Dust Piles; HBI, and Ilmenite Piles	~ 10' high	Pile Storage Area North East corner of Miller Road and Dix Avenue intersection	Contact with storage piles	High
Coke Piles, Iron Ore Pellet Piles, Limestone Piles, Slag Piles, etc.	~ 10' – 20' high	Boat Slip Area	Contact with storage piles	High

Note: Transformers are not listed on this table. Refer to SPCC / PIP Integrated Plan for detailed list of transformers including outdoor ones.

TABLE 3 – LIST OF SIGNIFICANT SPILLS – THREE YEARS PRIOR TO PERMIT EFFECTIVE DATE (02/01/2015)

DATE & TIME	LOCATION	MATERIAL & VOLUME	CORRECTIVE ACTIONS TAKEN
11/25/14 ~ 7:15 AM	Hot Strip Mill	Hydraulic oil, coolant & transmission fluid: Estimated 200 gallons released into ground because of slab carrier hydraulic lines rupture due to an accident.	<ul style="list-style-type: none"> ● Cleaned up spill recovering about 200 gallons of oil that was sent for recycling. Scraped 6 inch deep of soil (~10 cubic yards) in the spill area and disposed of it as solid waste. Spill area was filled with clean slag. ● Repaired slab carrier & re-trained driver.

TABLE 3 – LIST OF SIGNIFICANT SPILLS – THREE YEARS PRIOR TO PERMIT EFFECTIVE DATE (02/01/2015)

DATE & TIME	LOCATION	MATERIAL & VOLUME	CORRECTIVE ACTIONS TAKEN
08/18/14	ESP Dust Silo	<p>ESP Dust: An estimated 60 tons of ESP dust spilled on ground (asphalt pad & gravel) resulting from a failure of the vibration ring on the silo. The spilled material approximately contained 2,400 lbs. of Manganese compounds and 18,000 lbs. of Zinc Compounds.</p>	<ul style="list-style-type: none"> Cleaned up spill, sent out recovered material (3 truck- loads) for recycling and repaired vibration ring on the silo.

TABLE 3 – LIST OF SIGNIFICANT SPILLS – THREE YEARS PRIOR TO PERMIT EFFECTIVE DATE (02/01/2015)

DATE & TIME	LOCATION	MATERIAL & VOLUME	CORRECTIVE ACTIONS TAKEN
07/23/14	Cold Mill	PCB: An estimated 1 gallon spilled on ground during draining a PCB transformer	<ul style="list-style-type: none"> Cleaned up spill up to applicable standard & waste material disposed of per applicable standards.
12/11/13 ~ 3:30 AM	Hot Strip Mill Slab Yard	Hydraulic oil: Estimated 200 gallons released into ground from hydraulic fluid system breakdown.	<ul style="list-style-type: none"> Cleaned up spill & repaired system. About 175 gallons of oil were recovered and sent for recycling. Approximately, 2 cubic yards of soil and oil debris were collected and disposed of properly.

TABLE 3 – LIST OF SIGNIFICANT SPILLS – THREE YEARS PRIOR TO PERMIT EFFECTIVE DATE (02/01/2015)

DATE & TIME	LOCATION	MATERIAL & VOLUME	CORRECTIVE ACTIONS TAKEN
01/14/13 ~ 5:00 AM	East boat dock road & Turning Basin	Unknown amount of oil observed in the River after a ground collapse.	<ul style="list-style-type: none"> Placed booms in River and skimmed spilled oil. Approximately, 500 gallons of tar & water mixture and 20-yard box of & debris were efficiently recovered & disposed of properly.
09/05/12 ~ 7:00 AM	Slab Yard	Hydraulic oil: Estimated 200 gallons released into ground from hydraulic fluid hose rupture	<ul style="list-style-type: none"> About 50 gallons of oil were recovered & sent for recycling. Approximately, 15 cubic yards of soil & oil mix were disposed at a licensed landfill. No further environmental media hazard / impact was identified.
07/26/12 ~ 7:45 AM	#2 Tank @ Acid Tank Farm	HCl Acid: An estimated 5,000 gallons released into secondary containment due to tank flange failure resulting from corroded bolts.	<ul style="list-style-type: none"> Recovered spilled material & repaired tank. More durable / acid resistant bolts were used. Work requests were created in maintenance system to routinely inspect all flange bolts on all acid storage tanks to ensure proper integrity.

Appendix A

Site Maps

Figure 1 – Dearborn Works EPA My WATERS Mapper

Figure 2 – Dearborn Works General Location Map

Figure 3 – Oil & Polluting Material Storage Location

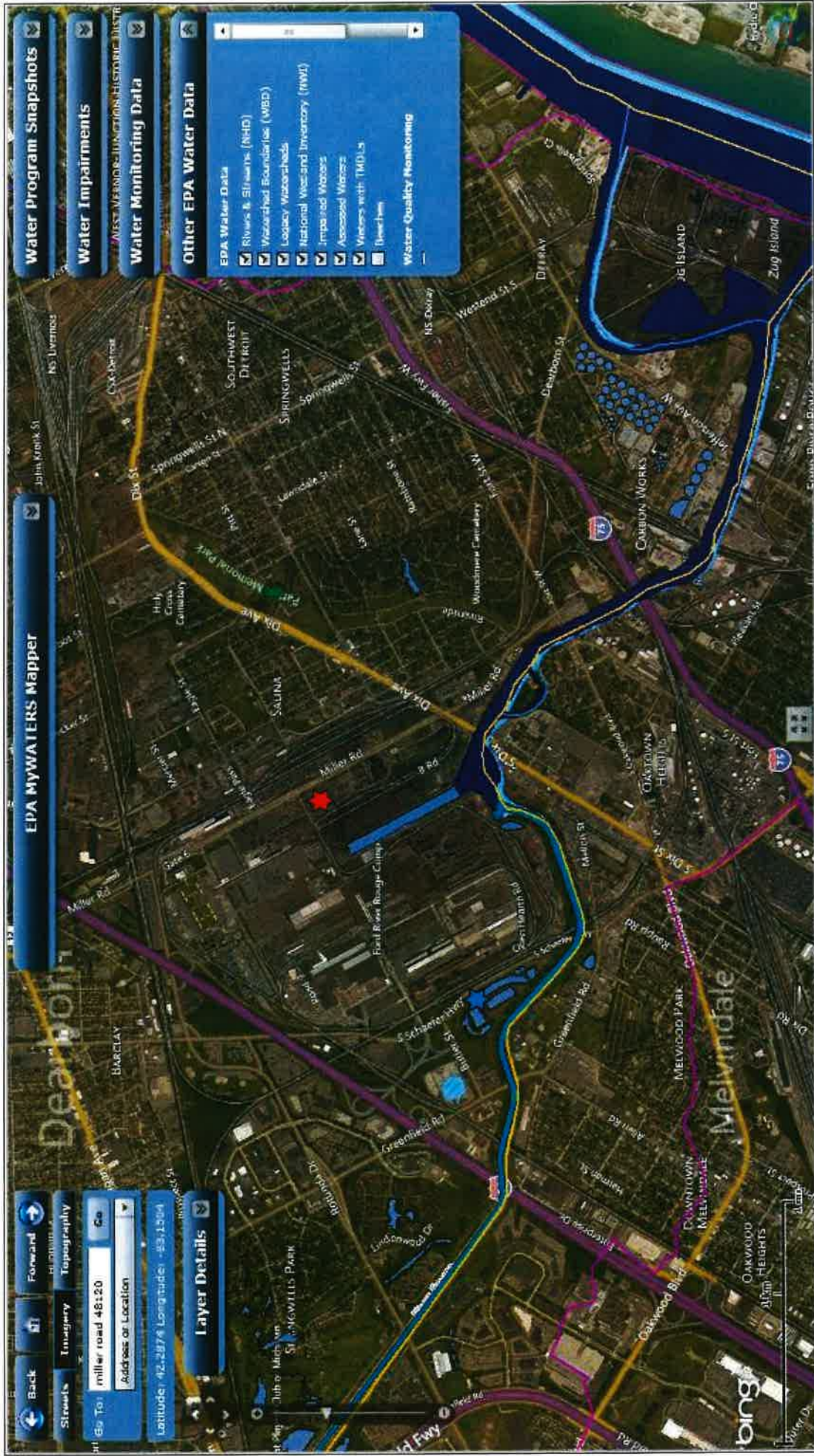
Figure 4 – Site Utility – Storm Sewers Map (Drawing No. 2004-GF-003)

Figure 5 – Surface Type Map

Figure 6 – Roads and Buildings

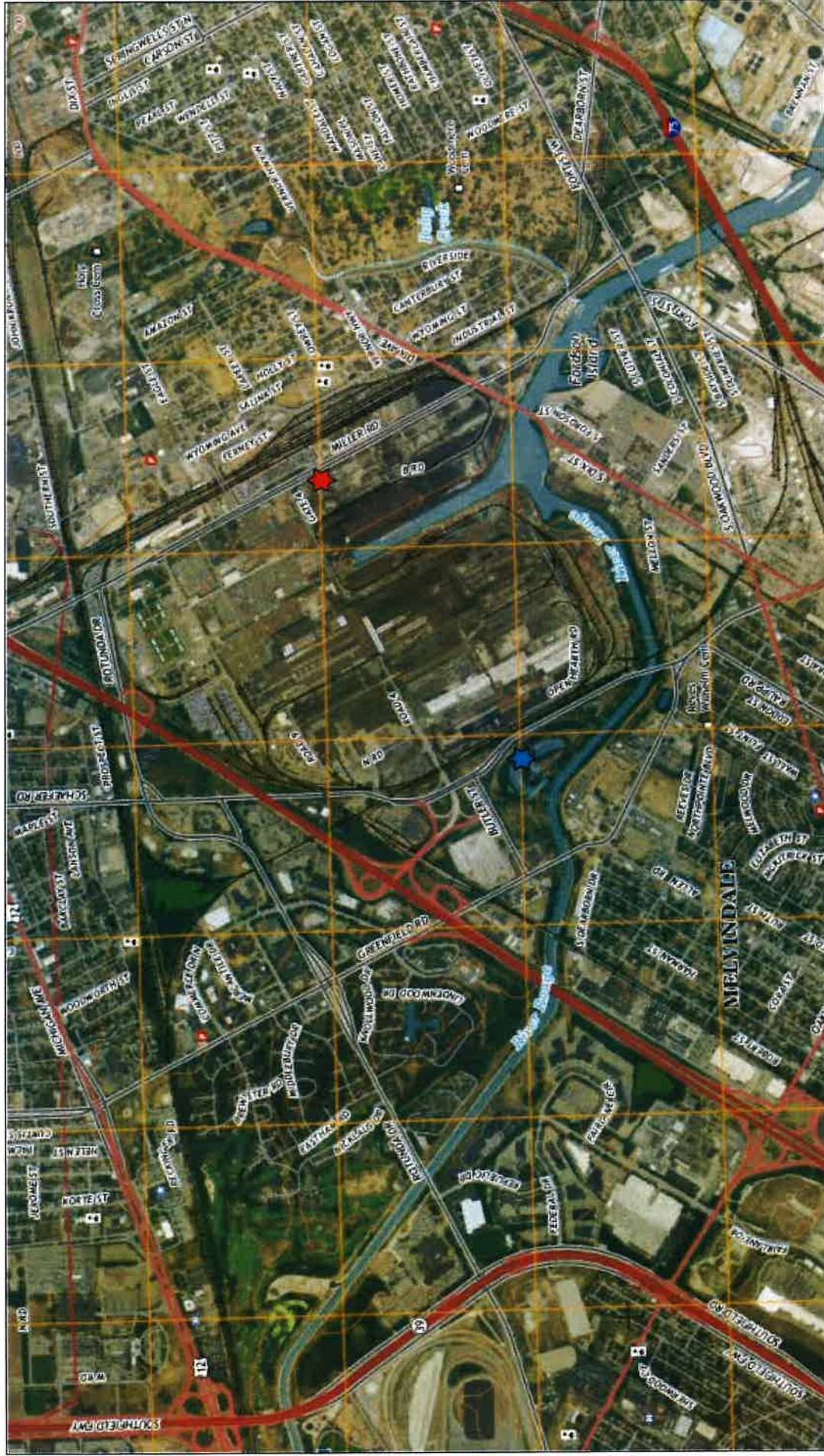
Cleveland-Cliffs Dearborn Works
Storm Water Pollution Prevention Plan

[PD1]



- ★ Cleveland-Cliffs Site Location
- ★ Schafer Waste Water Treatment Plant / Ponds
- Freshwater Emergent Wetland
- ▬ Surface Water Stream / Body
- ▬ Watershed Boundaries (WBD)
- ▬ Waters with TMDLs

Figure 2 - Dearborn Works General Location Map (Adopted from Morrisonville, NY USGS Quadrangle)



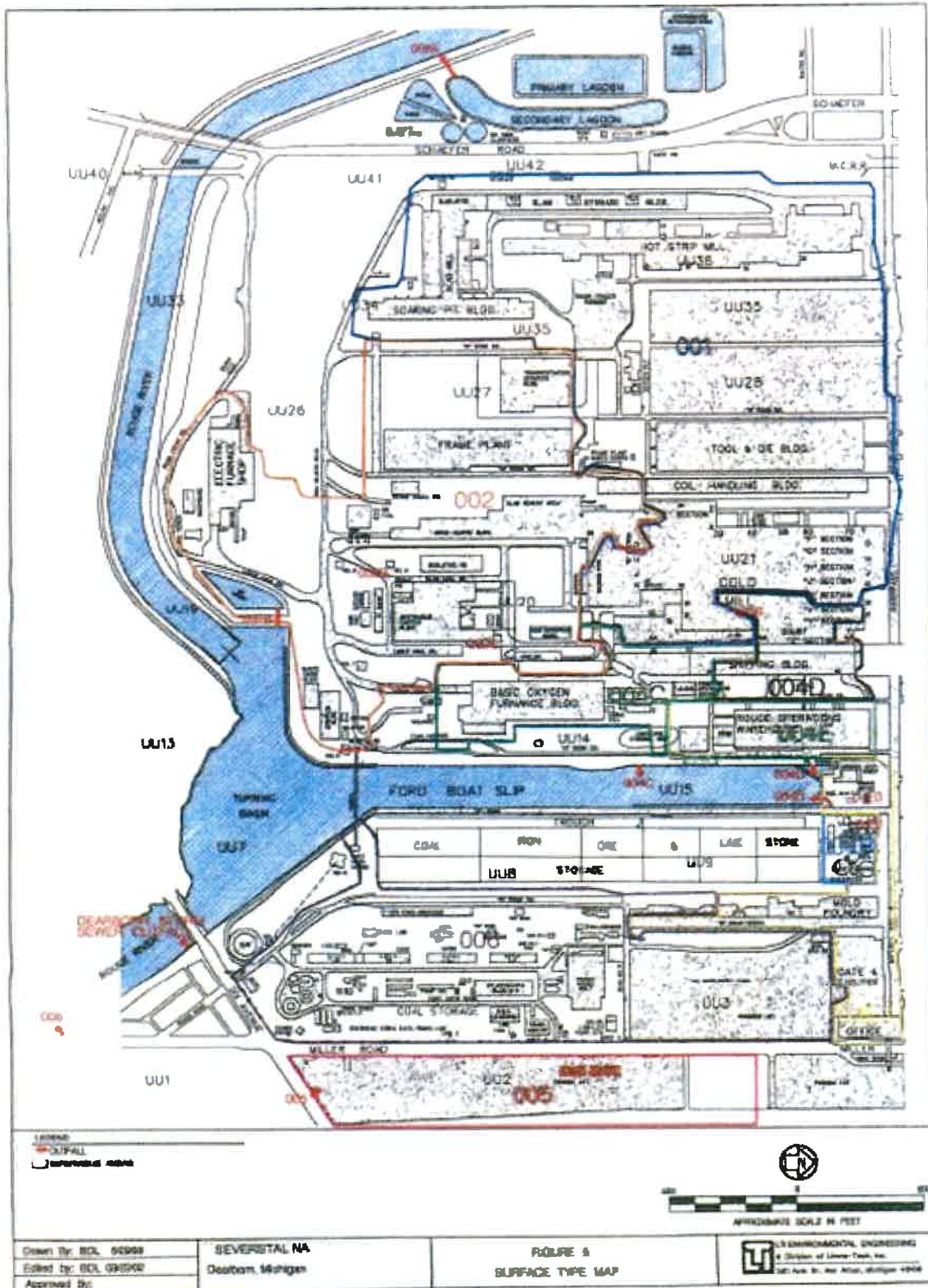
★ Cleveland-Cliffs Site Location ★ Schafer Waste Water Treatment Plant / Ponds

Figure 3 - Oil and Polluting Material Storage Location[MA3]



- LEGEND
- INSIDE OIL-BASED POLLUTING
 - OUTSIDE OIL-BASED POLLUTING
 - INSIDE POLLUTING
 - OUTSIDE POLLUTING
 - ⊖ SPILL PIT
 - ◆ TANKER FILLING
 - BUILDING OR STRUCTURE FOOTPRINT
 - SITE BOUNDARY

Figure 5 - Surface Type Map



Appendix B Report Forms

SWPPP Pile Inspection Log: FORM(E)-W-00-04-1

SWPPP Quarterly Comprehensive Review: FORM(E)-W-00-04-02

SWPPP Preventive Maintenance Report: FORM(E)-W-00-04-3

Pile Inspection Log

Inspector Name:	Date / Time:
-----------------	--------------

#	Inspection Item	Drainage Area								Comments
		001	002	004B	004C	004D	004E	006	Other Areas ⁽¹⁾	
1.	Storage piles are within the designated area(s)									
2.	No evidence of washout or overflow of storage piles to storm drains									
3.	Storage piles are located at adequate distance from storm drains to prevent runoff or washout into drains									
4.	Piles do not have any unstable slopes									
5.	Piles do not have any smoke or other evidence of combustion									
6.	Piles do not have any traces of oil or other chemicals									
7.	Piles do not have any strange odors or fumes									
8.	There are no new piles that are not identified in the SWPPP storage pile inventory									

* All true statements are to be noted "YES." All "NO" responses require follow up action and correction; "NA" to be used if not applicable.

(1) Other Areas include Levy area on the South side of the plant, coal, iron ore and limestone bin storage and outdoor pile storage on the east side of the Ford Boat Slip, pile storage area and parking lot on the North East corner of Miller Road and Dix Avenue intersection and non-drainage or non-point discharge areas. .

Notes / Additional Comments & Observations (use additional sheets if necessary):



SWPPP Quarterly Comprehensive Inspection

INSPECTION DATE: _____ JANUARY - MARCH _____ APRIL - JUNE _____ JULY - SEPTEMBER _____ OCTOBER - DECEMBER _____

SITE CONDITIONS: _____

WEATHER GAUGE NAME: _____

PRECIPITATION INFORMATION FOR THE PAST 72 HOURS (DATE, GAUGE MEASUREMENT, EVENT DURATION): _____

CERTIFIED STORM WATER OPERATOR INSPECTOR: _____ PRINTED NAME & JOB TITLE _____ CERTIFICATION NUMBER: _____

SIGNATURE

IS THE FACILITY IN COMPLIANCE WITH THE GENERAL PERMIT AND THE SWPPP? YES NO (IF NO, PLEASE LIST COMPLIANCE ISSUES BELOW IN THE COMMENTS SECTION)

All true statements are to be noted "YES". All "NO" responses require follow up action and correction. "NA" is to be used if not applicable. Other Areas include the Levy area on the South side of the plant, coal, iron ore and limestone, bin storage and outdoor pile storage on the east side of the Ford Boat Slip, pile storage area and parking lot on the North East corner of Miller Road and Dix Avenue intersection and non-drainage or non-point discharge areas.

EMPLOYEE PARKING LOTS		Is the parking lot clean of sediment, debris, and petroleum products?	Are storm water inlets clean of debris?	Are the surfaces of storm water inlets free of standing water?	Is there evidence of any maintenance on employee-owned vehicles?	Are areas free of visible surface erosion?	Are landscaped areas and grass covered areas free from gull erosion?	Comments/Corrective Actions
001A								
002A								
004B								
004C								
004D								
04EO								
006A								
OTHER AREAS								

Notes/Additional Comments and Observations (use additional sheets if necessary):



SWPPP Quarterly Comprehensive Inspection

INSPECTION DATE: _____ JANUARY - MARCH _____ APRIL - JUNE _____ JULY - SEPTEMBER _____ OCTOBER - DECEMBER _____

SITE CONDITIONS: _____

WEATHER GAUGE NAME: _____

PRECIPITATION INFORMATION FOR THE PAST 72 HOURS (DATE, GAUGE MEASUREMENT, EVENT DURATION): _____

STORAGE AREAS FOR SIGNIFICANT AND POLLUTING MATERIALS (USE TABLE 2 - SIGNIFICANT MATERIALS LIST AND SITE MAP OF THE SWPPP AS A REFERENCE)

MONITORING POINT	Are drums observed? If Yes, continue on. If No, mark N/A for remaining questions.)	Are drums on secondary containment?	Are drums on free of cracks, settlement, waste accumulation, and petroleum products?	Is there any evidence (stains) of washout or overflow in the containment area(s)?	Are drums securely covered, contained, and not leaking?	Are storage containers free of deterioration, leaks, or corrosion?	Are Significant Materials properly labeled and segregated?	Are waste fluids and empty drums accumulating?	Are spill kits available?	Are above-ground storage tanks provided with secondary containment?	Is the secondary containment free of liquids, debris, spills, and leaks?	Comments/Corrective Actions
001A												
002A												
004B												
004C												
004D												
04EO												
006A												
OTHER AREAS												

Notes/Additional Comments, Observations, or Corrective Actions (use additional sheets if necessary):



SWPPP Quarterly Comprehensive Inspection

INSPECTION DATE: _____ JANUARY - MARCH _____ APRIL - JUNE _____ JULY - SEPTEMBER _____ OCTOBER - DECEMBER _____

SITE CONDITIONS: _____

WEATHER GAUGE NAME: _____

PRECIPITATION INFORMATION FOR THE PAST 72 HOURS (DATE, GAUGE MEASUREMENT, EVENT DURATION): _____

TRANSFERLOADING AND UNLOADING AREAS				
MONITORING POINT	Are transfer/loading areas free of active spills or releases?	Are containment areas free of cracks, debris, water accumulation, and petroleum?	Are spill kits available?	Comments/Corrective Actions
001A				
002A				
004B				
004C				
004D				
04EO				
006A				
OTHER AREAS				

Notes/Additional Comments, Observations, or Corrective Actions (use additional sheets if necessary):

BUILDING AND OPERATIONS, GENERAL HOUSEKEEPING				
MONITORING POINT	Are areas immediately outside of buildings free of leaks and spills?	Are areas immediately inside the building immediately by roll off doors free of leaks and spills?	Are plant areas kept clean/good housekeeping (e.g., no open containers, no unattended spills, etc.?)	Comments/Corrective Actions
001A				
002A				
004B				
004C				
004D				
04EO				
006A				
OTHER AREAS				

Notes/Additional Comments, Observations, or Corrective Actions (use additional sheets if necessary):



SWPPP Quarterly Comprehensive Inspection

INSPECTION DATE: _____ JANUARY - MARCH _____ APRIL - JUNE _____ JULY - SEPTEMBER _____ OCTOBER - DECEMBER _____

INSPECTION TIME: _____

SITE CONDITIONS: _____

WEATHER GAUGE NAME: _____

PRECIPITATION INFORMATION FOR THE PAST 72 HOURS (DATE, GAUGE MEASUREMENT, EVENT DURATION): _____

FACILITY VEHICLE PARKING AREAS					
MONITORING POINT	Do storm water inlets appear to be clean of any debris that may impede flow into the storm drains?	Are storm water inlets free of standing water at the surfaces?	Is the area free of visible surface erosion?	Is there evidence of runoff leading to the storm water inlets?	Comments/Corrective Actions
001A					
002A					
004B					
004C					
004D					
04EO					
006A					
OTHER AREAS					

Notes/Additional Comments, Observations, or Corrective Actions (use additional sheets if necessary):

WASTE RECEPTACLE (ROLL OFF) STORAGE AND MAINTENANCE AREAS					
MONITORING POINT	Are there signs of material track out?	Are nearby storm water inlets free of debris?	Is storm water runoff present, is there evidence of sheen or discoloration?	Is waste placed in the appropriate waste receptacle?	Comments/Corrective Actions
001A					
002A					
004B					
004C					
004D					
04EO					
006A					
OTHER AREAS					

Notes/Additional Comments, Observations, or Corrective Actions (use additional sheets if necessary):



SWPPP Quarterly Comprehensive Inspection

INSPECTION DATE: _____ JANUARY - MARCH _____ APRIL - JUNE _____ JULY - SEPTEMBER _____ OCTOBER - DECEMBER _____

INSPECTION TIME: _____

SITE CONDITIONS: _____

WEATHER GAUGE NAME: _____

PRECIPITATION INFORMATION FOR THE PAST 72 HOURS (DATE, GAUGE MEASUREMENT, EVENT DURATION): _____

OUTDOOR STORAGE PILES (USE TABLE 2 - SIGNIFICANT MATERIALS LIST AND SITE MAP OF THE SWPPP AS A REFERENCE)		
MONITORING POINT	Are storage piles within the designated area(s)?	Is there any evidence of washout or overflow of storage piles to storm drains and/or Boat Slip?
001A		
002A		
004B		
004C		
004D		
04EO		
006A		
OTHER AREAS		
Notes/Additional Comments, Observations, or Corrective Actions (use additional sheets if necessary):		

RUNOFF CONTROL		
MONITORING POINT	Are berms along Boat Slip Road free of washout?	Comments/Corrective Actions
001A		
002A		
004B		
004C		
004D		
04EO		
006A		
OTHER AREAS		
Notes/Additional Comments, Observations, or Corrective Actions (use additional sheets if necessary):		



SWPPP Quarterly Comprehensive Inspection

INSPECTION DATE: _____ JANUARY - MARCH _____ APRIL - JUNE _____ JULY - SEPTEMBER _____ OCTOBER - DECEMBER _____

INSPECTION TIME: _____

SITE CONDITIONS: _____

WEATHER GAUGE NAME: _____

PRECIPITATION INFORMATION FOR THE PAST 72 HOURS (DATE, GAUGE MEASUREMENT, EVENT DURATION): _____

MONITORING POINT	Are outfalls free of sediment and debris?	Are outfalls functional?	Does outfall water appear to be free of debris, sediment, petroleum materials, and other Significant and Polluting Materials?	Comments/Corrective Actions
001A				
002A				
004B				
004C				
004D				
04EO				
006A				

Notes/Additional Comments, Observations, or Corrective Actions (use additional sheets if necessary):

MONITORING POINT	Have corrective problems from the previous inspection report been addressed? (If Yes, please include date of corrective action.)	If repairs have been made to correct problems since the last site inspection, do they appear to have been adequate and the problem has been alleviated?	Are there storm water inlets or other drainage features that need to be added to the SWPPP? (If Yes, please describe.)	Are there any structural control or storm water treatment devices added to the SWPPP? (If Yes, please describe.)	Please list the dates of the last completed Comprehensive Inspection, Monthly Inspection Report, and Annual Certification of Compliance.	Are monthly SPCC/PIP inspections completed?	Are monthly SPCC/PIP inspection records maintained adequately?	Is preventative maintenance of storm water management and control devices (e.g., cleaning of oil/water separators and catch basins, routine housekeeping activities, etc.) being implemented adequately and records being maintained?	Has SWPPP training been completed for required employees, including any recent changes, and are training records being maintained?	Has an Annual Review of the SWPPP been completed and report submitted to EQL.E by January 10th? (Submital starting 2016)	Comments/Corrective Actions
001A											
002A											
004B											
004C											
004D											
04EO											
006A											

Notes/Additional Comments, Observations, or Corrective Actions (use additional sheets if necessary):



SWPPP Preventive Maintenance Report

Inspector Name:	Date / Time:
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Instructions: Inspect storm water conveyances such as drain inlets, catch basins, and sewer junction manholes for obstructions and coordinate cleared/cleaning as needed. Check fabric filters where used at catch basins & have changed or cleaned as needed.

Drainage Area Inspected	Observations	Corrective Actions
001		
002		
004B		
004C		
004D		
004E		
006		
Others / General Facility ⁽¹⁾		

**(1) Other Areas include Levy area on the South side of the plant, iron ore and limestone bin storage and outdoor pile storage on the east side of the Ford Boat Slip, pile storage area and parking lot on the North East corner of Miller Road and Dix Avenue intersection and non-drainage or non-point discharge areas.
Use additional sheets for observations if necessary**

Appendix C

Pile Management Plan



PILE MANAGEMENT PLAN

Cleveland-Cliffs Steel Corporation Dearborn Works
4001 Miller Road
Dearborn, MI 48120
Located in
CITY OF DEARBORN WAYNE COUNTY, MICHIGAN

Prepared by:
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TABLE OF CONTENTS

1.0	BACKGROUND AND PURPOSE OF THE PLAN	43
2.0	MATERIALS COVERED BY THE PLAN	43
3.0	CURRENT PILE INVENTORY	44
4.0	PROCEDURES FOR SITING NEW PILES	44
4.1	PILE SITING CONSIDERATIONS.....	44
4.2	PILES INSPECTION.....	44
4.3	PILE MAINTENANCE	44

1.0 BACKGROUND AND PURPOSE OF THE PLAN

This Pile Management Plan (PMP) was prepared to facilitate management of bulk solid materials managed outdoors at the Cleveland-Cliffs Dearborn Works (Dearborn Works) facility located in Dearborn, Michigan, and has been developed as part of the Storm Water Pollution Prevention Plan (SWPPP) for the facility. During the course of preparing the SWPPP, it became apparent that the nature and placement of some bulk materials commonly encountered at the facility may degrade storm water quality by contributing polluting materials to storm water runoff. In addition, placement practices at the facility may impede proper drainage in some cases.

The primary objective of this plan is to prevent the degradation of storm water by:

- 1.0 Providing standards for the placement and management of piles at the Dearborn Works facility; and
- 2.0 Providing a mechanism for the facility Environmental Affairs Department to track and monitor piles at the facility.

The plan achieves these objectives by establishing procedures and guidelines for siting, documenting, inspecting and maintaining piles.

2.0 MATERIALS COVERED BY THE PLAN

This plan is intended to cover all bulk materials stored at Dearborn Works in piles greater than five cubic yards. A five cubic yard pile is roughly equivalent to a circular pile ten feet across and five feet high. Specific materials to be covered by this plan include, but are not limited to:

- Coke and Coke Fines
- Ore and Ore Fines
- Limestone
- Slag
- Scrap Metal
- Pond and Lagoon Dredge Spoils
- Mill Scale
- Flue Dust
- Wastewater Treatment Filter Cake
- Gravel
- Fill Dirt
- Topsoil
- Sand
- Road Salt
- Any material that may impact storm water quality.

If a material does not appear on this list, but it will be stored in piles, it will be at the discretion of the Environmental Affairs Department as to whether or not the PMP applies. In addition, it is expected that there will be an occasional need for temporary pile storage. If a pile is to be placed temporarily (i.e., it will not exist for more than 72 hours), the pile is exempt from the notification requirements of this plan. This exemption does not apply if the pile is simply relocated within the 72-hour time frame.

3.0 CURENT PILE INVENTORY

Existing piles at Dearborn Works were inventoried during site inspection for preparation of the facility's SWPPP. A list of piles by drainage area is presented in Table 2 – Significant Materials List in the SWPPP.

4.0 PROCEDURES FOR SITING NEW PILES

There are four major components for environmentally safe pile management: siting, inspection, documentation, and maintenance. The following subsections describe the procedures for each of these components. These procedures are to be followed at all times. Any deviation from these procedures must be approved by the Environmental Affairs Department.

4.1 PILE SITING CONSIDERATIONS

Placement of new piles should take into account the following considerations:

- Piles should not obstruct normal traffic;
- Piles should never be placed directly over catch basins, curb drains, or other drainage inlet structures;
- Piles should not be placed near a surface water body;
- Piles should not be placed near drainage inlet structures and avoided where possible; and
- Piles should be placed so as to minimize any disturbance to surface drainage.

These siting conditions should be reviewed annually or as necessary to assess their adequacy.

4.2 PILES INSPECTION

Pile inspections will be scheduled and documented monthly. These inspections will be conducted by an individual familiar with the provisions and rationale of this plan to assess facility compliance. A log of monthly pile inspections will be maintained by the Environmental Affairs Department, using the format contained in Appendix B – Pile Inspection Log. This log will be kept on file in the Environmental Affairs Department for three years.

The inspector will note and investigate any unusual conditions observed, including but not limited to:

- Unstable slopes;
- Smoke or other evidence of combustion;
- Traces of oil or other chemicals coming from the pile; and
- Strange odors of fumes.

The occurrence of these or other unusual observations should be documented in the Inspection Log.

4.3 PILE MAINTENANCE

Piles will be maintained so as to protect water quality and worker safety. Specifically, the following procedures should be followed:

- Adequate space between piles should be maintained to allow inspection.

- Piles containing oily materials or materials coated with other chemicals (e.g., solvents) should be covered or surrounded by spill socks to contain these pollutants if there is a reasonable potential for leaching of those substances from the pile.
- Unnaturally steep pile slopes resulting from piling of wet materials or undercutting during material removal will be knocked down to at least the natural angle of repose of the material.
- While adding material to or removing material from piles, reasonable efforts will be made to minimize airborne dust and particles.
- If a pile is observed to be a source of significant quantities of dust or other airborne particulate matter, remedial measures will be implemented at the discretion of the Environmental Affairs Department. Such remedial measures may include, but are not limited to, wetting of the pile, covering the pile, or elimination of the pile.

Appendix D

TMDL Documentation

Total Maximum Daily Load for E. coli for the Rouge River Watershed:

<https://www.michigan.gov/egle/-/media/Project/Websites/egle/Documents/Programs/WRD/SWAS/TMDL-Ecoli/statewide-ecoli-tmdl.pdf>

Total Maximum Daily Load for Biota for the Rouge River Watershed:

https://www.michigan.gov/documents/deq/wrd-swas-tmdl-biota-river-rouge_577534_7.pdf

Attachment E: Dearborn Works Dust Control Devices

Control Device	Maintenance Requirements	Monitoring Requirements	Calibration / Certification Requirements
Pulverized Coal Silo Bin Vent Filters	Semi-annual Inspection	Monthly EPA Method 9 Observations	Semi-Annual Method 9 Certification Renewal
Coke Screening DD Baghouse	Monthly Inspection	Monthly EPA Method 9 Observations	Semi-Annual Method 9 Certification Renewal
Coke Unloading EE Baghouse	Monthly Inspection	Monthly EPA Method 9 Observations	Semi-Annual Method 9 Certification Renewal
Raw Material Handling Baghouse	Monthly Inspection	Monthly EPA Method 9 Observations Weekly Differential Pressure Monitoring	Semi-Annual Method 9 Certification Renewal Annual calibration check of Differential Pressure Meter
	Inspections in accordance with EGLE approved Operation and Maintenance (O&M) Plan	Parametric Monitoring of Baghouse inlet pressure and casthouse damper positions in accordance with EGLE approved Continuous Parametric Monitoring System (CPMS) Plan Daily Differential Pressure Monitoring Continuous Bag Leak Detection System Monitoring Monthly EPA Method 9 Observations	Quarterly calibration check of Baghouse inlet pressure and casthouse damper positions Annual calibration checks of Differential Pressure Meters Annual calibration checks of Bag Leak Detection System Monitors Semi-Annual Method 9 Certification Renewal
C-Blast Furnace Baghouse		Periodic emissions testing	
Lime Unloading Baghouse	Monthly Inspection	Monthly EPA Method 9 Observations	Semi-Annual Method 9 Certification Renewal
BOF Secondary Emissions Capture Baghouse	Inspections in accordance with EGLE approved Operation and Maintenance (O&M) Plan	Parametric Monitoring of Baghouse plenum pressure and BOF capture system damper positions in accordance with EGLE approved Continuous Parametric Monitoring System (CPMS) Plan Daily Differential Pressure Monitoring Continuous Bag Leak Detection System Monitoring Monthly EPA Method 9 Observations	Quarterly calibration check of Baghouse plenum pressure and BOF capture system damper positions Annual calibration checks of Differential Pressure Meters Annual 3rd party check of Bag Leak Detection System Monitors Semi-Annual Method 9 Certification Renewal
Desulfurization Baghouse	Monthly and Quarterly Inspections	Daily Differential Pressure Monitoring Continuous Bag Leak Detection System Monitoring Monthly EPA Method 9 Observations Periodic emissions testing	Annual calibration checks of Differential Pressure Meters Annual 3rd party check of Bag Leak Detection System Monitors Semi-Annual Method 9 Certification Renewal
BOF Electrostatic Precipitator	Inspections in accordance with EGLE approved Operation and Maintenance (O&M) Plan	Continuous Opacity Monitor (COM) Weekly EPA Method 9 Observations Periodic emissions testing	Quarterly and Annual checks of COM in accordance with EPA Performance Specification 1 and EGLE Approved COM Monitoring Plan Semi-Annual Method 9 Certification Renewal
Ladle Refining Furnace No. 1 Baghouse	Monthly and Quarterly Inspections	Daily Differential Pressure Monitoring Continuous Bag Leak Detection System Monitoring Monthly EPA Method 9 Observations Periodic emissions testing	Annual calibration checks of Differential Pressure Meters Annual 3rd party check of Bag Leak Detection System Monitors Semi-Annual Method 9 Certification Renewal
Ladle Refining Furnace No. 2 Baghouse	Monthly and Quarterly Inspections	Daily Differential Pressure Monitoring Continuous Bag Leak Detection System Monitoring Monthly EPA Method 9 Observations Periodic emissions testing	Annual calibration checks of Differential Pressure Meters Annual 3rd party check of Bag Leak Detection System Monitors Semi-Annual Method 9 Certification Renewal
Machine Scarfing Baghouse	Inspections in accordance with EGLE approved Malfunction Abatement Plan (MAP)	Daily Differential Pressure Monitoring Weekly EPA Method 9 Observations Periodic emissions testing	Annual calibration checks of Differential Pressure Meters Semi-Annual Method 9 Certification Renewal
PLTCM Scalebreaker Baghouse	Inspections in accordance with EGLE approved Malfunction Abatement Plan (MAP)	Per Shift Differential Pressure Monitoring Monthly Non-certified Visible Emission Observation Periodic emissions testing	Annual calibration checks of Differential Pressure Meters
PLTCM Tandem Mill Oil Mist Eliminator	Inspections in accordance with EGLE approved Malfunction Abatement Plan (MAP)	Per Shift Differential Pressure Monitoring Periodic emissions testing	Annual calibration checks of Differential Pressure Meters
HDGL Precleaner Scrubber	Inspections in accordance with EGLE approved Malfunction Abatement Plan (MAP)	Per Shift Differential Pressure Monitoring Per Shift Water Flow Monitoring Periodic emissions testing	Annual calibration checks of Differential Pressure Meter and water flow meter