

IEPA EXHIBIT

No. 18



October 14, 2002

Granite City Division
National Steel Corporation
20th & State Streets
Granite City, Illinois 62040
(618) 451 3456

Mr. Tom McSwiggin, Manager
Permit Section
Division of Water Pollution Control
Illinois Environmental Protection Agency
1021 North Grand Ave. East, P.O. Box 19276
Springfield, Illinois 62706

RECEIVED

OCT 17 2002

Environmental Protection Agency
WPC-- Permit Log In

Dear Mr. McSwiggin:

**Subject: Application for Renewal of NPDES Discharge Permit
NO. IL0000329**

Enclosed is an application for renewal of the NPDES Discharge Permit for the Granite City Division of National Steel Corporation.

Granite City Division requests that the 301 (g) variances for ammonia and phenol and the background credit for zinc be maintained.

Granite City Division continues to believe that our facility has been granted the central treatment exemption. Specifically, the limitations should be based on the current systems ability to treat.

With respect to Outfall 001, Granite City Division requests that the monitoring for dissolved iron and weak acid dissociable cyanide be waived. The existing limitations for total iron and total cyanide will assure the protection of human health and the environment.

With respect to Outfall 001A, Granite City Division requests that the monitoring for benzene be waived. The new USEPA Effluent Limitation Guidelines no longer have limitations for benzene for cokemaking operations. Therefore the monitoring at Outfall 001A for benzene is not required.

With respect to Outfall 001B, Granite City Division requests that the monitoring be waived. Outfall 001B is not a direct discharge to the waters of the state and is further treated through the central treatment system. Outfall 001B has consistently met the existing limitations, and is a safety concern in terms of accessibility. The new USEPA Effluent Limitation Guidelines no longer have limitations for tetrachlorethylene and naphthalene for cold rolling operations. Therefore the monitoring at Outfall 001B is not required.

Should you have any questions or require additional information, please contact me at (618) 451-3013.

Very truly yours,

A handwritten signature in cursive script that reads 'Carl E. Cannon'.

Carl E. Cannon
Manager Environmental Control

Enclosure
MCSWIG.CEC

 August 6 through 10, 2002 Test

Test Solution	<i>Selenastrum capricornutum</i> Mean No. Cells per mL (x10 ⁶)
Laboratory Control	4.3292
Horseshoe Lake Control	3.5250
6.25% Effluent	3.3750
12.5% Effluent	3.4375
25% Effluent	3.5667
50% Effluent	3.3708
100% Effluent	3.8208 ^a
IC ₂₅	>100%

 a = NOEC

The results of the July 16 through 23, 2002 tests show that:

- The effluent was not acutely toxic to *Ceriodaphnia dubia* or fathead minnows at the 100 percent concentration, using the 50 percent lethality criteria. The LC₅₀ values were greater than 100 percent for both species.
- The first effluent sample was chronically toxic to *Selenastrum capricornutum* at all concentrations tested, based on significant difference and the 25 percent inhibition analysis. The NOEC was 0 percent (control water) and the IC₂₅ for algal growth (cell density) was 4.56 percent.
- The effluent samples were not chronically toxic to *Ceriodaphnia dubia* through the 100 percent concentration, based on significant difference and the 25 percent inhibition analysis. The NOEC was 100 percent and the IC₂₅ for reproduction was greater than 100 percent.
- The effluent samples were not chronically toxic to fathead minnows through the 100 percent concentration, based on the 25 percent inhibition analysis. However, the effluent was chronically toxic to fish weight at the 100 percent concentration, based on significant difference. The NOEC was 50 percent and the IC₂₅ for biomass was greater than 100 percent.
- Horseshoe Lake and laboratory control water data were acceptable in all bioassays.

The results of the August 6 through 10, 2002 retest show that:

- The effluent sample was not chronically toxic to *Selenastrum capricornutum* at all concentrations tested, based on significant difference and the 25 percent inhibition analysis. The NOEC was 100 percent and the IC₂₅ for algal growth (cell density) was greater than 100 percent effluent.
- Horseshoe Lake and laboratory control water data were acceptable in the bioassay.

Chronic Bioassays

Table 7 presents the results of the July 16 through 23 chronic bioassays. The first effluent sample was chronically toxic to *Selenastrum capricornutum* at all concentrations tested, based on significant difference and the 25 percent inhibition analysis. The NOEC was 0 percent (control water) and the IC₂₅ for algal growth (cell density) was 4.56 percent.

The effluent samples were not chronically toxic to *Ceriodaphnia dubia* through the 100 percent concentration, based on significant difference and the 25 percent inhibition analysis. The NOEC was 100 percent and the IC₂₅ for reproduction was greater than 100 percent.

The effluent samples were not chronically toxic to fathead minnows through the 100 percent concentration, based on the 25 percent inhibition analysis. However, the effluent was chronically toxic to fish weight at the 100 percent concentration, based on significant difference. The NOEC was 50 percent and the IC₂₅ for biomass was greater than 100 percent.

Horseshoe Lake and laboratory control water data were acceptable in all bioassays.

Table 7
Summary of Results of Chronic Bioassays
Conducted for National Steel Corporation
Granite City, Illinois
July 16 through 23, 2002

Test Solution	<i>Selenastrum capricornutum</i>	<i>Ceriodaphnia dubia</i>		Fathead Minnow	
	Mean No. Cells per mL (x10 ⁶)	Mean % Survival	Mean No. of Offspring	Mean % Survival	Mean Growth (mg)
Laboratory Control	1.8333	100	27.3	100	0.723
Horseshoe Lake Control	1.5688	100	25.3	100	0.674
6.25% Effluent	1.0307*	100	26.5	84.6	0.675
12.5% Effluent	0.8183*	100	26.2	100	0.626
25% Effluent	0.4033*	100	26.7	92.5	0.556
50% Effluent	0.0883*	100	25.7	95	0.619
100% Effluent	0.1167*	90	24.7	92.5	0.517*
IC ₂₅	4.56%		>100%		>100%

* Indicates significant ($p \leq 0.05$) difference (reduction) from lake control data

Table 8 presents the results of the August 6 through 10 chronic toxicity retest. The effluent sample was not chronically toxic to *Selenastrum capricornutum* at all concentrations tested, based on significant difference and the 25 percent inhibition analysis. The NOEC was 100



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397
 JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

Memorandum

RECEIVED
 JUL 10 2003

DATE: July 9, 2003

TO: Ukanno Foxworth

ILLINOIS ENVIRONMENTAL
 PROTECTION AGENCY
 BOW/WPC/PERMIT SECTION

FROM: Bob Mosher *RM*

SUBJECT: US Steel Corp. – Granite City Water Quality Based Effluent Limits
 NPDES Permit No. IL0000329 Madison County

The subject facility, formerly known as National Steel – Granite City Division, discharges Outfall 001 final effluent to Horseshoe Lake, which has zero flow during critical 7Q10 low-flow conditions. The facility has had a highest monthly average flow of 21 MGD in recent years. Average monthly flow is 16 MGD. The facility withdraws water from the Mississippi River and discharges to the lake.

Horseshoe Lake is classified as a General Use Water and is not rated under the Agency's Biological Stream Characterization (BSC) program. Horseshoe Lake, Waterbody Segment, RJC, is found on the draft 2002 Illinois 303(d) list. The lake is listed as non-supportive of swimming uses and partially supportive of overall, aquatic life, fish consumption and secondary contact uses. The potential causes of impairment given for the segment at that time were PCBs, pH, suspended solids, excessive algae growth, ammonia (un-ionized), nutrients, phosphorus and inorganic N (nitrate). The potential sources associated with the impairment are agriculture, crop related sources, nonirrigated crop production, habitat modification and streambank modification/ destabilization.

Cadmium, Chromium (Trivalent), Copper, Lead, Nickel, and Zinc standards are based on hardness data collected from Horseshoe Lake by the facility, with a critical hardness value of 320 mg/L as CaCO₃. Water quality standards identified in the table are expressed in units of mg/L. Dissolved metals standards have been converted to total metal except where noted.

Substance	Max. Eff. Conc.	No. of Samples	Multiply by	95% Potential	Acute Standard	Chronic Standard	302.208(g) standard	Further Analysis?
Arsenic	<0.025	1	6.2	0.155	0.3600	0.1900	-	No RP*
Barium	0.081	20	1.4	0.1134	-	-	5.0	No RP*
Cadmium	<0.005	20	1.4	0.007	0.0362	0.0028	-	Yes
Chromium (Hex)		0	0.0	0	0.0160	0.0110	-	No Data
Chromium (Total)	<0.005	20	1.4	0.007	4.5019	0.5366	-	No RP*
Cyanide (WAD)	0.066	312	1.0	0.066	0.0220	0.0052	-	Yes
Copper	0.0093	20	1.4	0.013	0.0530	0.0319	-	No RP*
Fluoride	4.1	331	1.0	4.1	-	-	1.4	Yes
Iron (Dissolved)	1	312	1.0	1.0	-	-	1.0	Yes

ROCKFORD – 4302 North Main Street, Rockford, IL 61103 – (815) 987-7760 • DES PLAINES – 9511 W. Harrison St., Des Plaines, IL 60016 – (847) 294-4000

ELGIN – 595 South State, Elgin, IL 60123 – (847) 608-3131 • PEORIA – 5415 N. University St., Peoria, IL 61614 – (309) 693-5463

BUREAU OF LAND - PEORIA – 7620 N. University St., Peoria, IL 61614 -- (309) 693-5462 • CHAMPAIGN – 2125 South First Street, Champaign, IL 61820 – (217) 278-5800

SPRINGFIELD – 4500 S. Sixth Street Rd., Springfield, IL 62706 – (217) 786-6892 • COLLINSVILLE – 2009 Mall Street, Collinsville, IL 62234 – (618) 346-5120

MARION – 2309 W. Main St., Suite 116, Marion, IL 62959 – (618) 993-7200

IEPA EXHIBIT

No. 36

20th and State Streets
Granite City, Illinois 62040
618-451-3013



United States Steel Corporation
Granite City Works
Environmental Control Department

To: <i>Ukanno Foxworth</i>	From: <i>Carl Cannon</i>
Fax: 217-782-9891	Pages: 3
Phone:	Date: 12/17/03
Re:	CC:

Urgent For Review Please Comment Please Reply Please Recycle

● **Comments:**

Ukanno-

Per your request, attached is the information on the 301(g) variances from the USEPA.

Also, we do not have any storm water flows discharged through a conveyance that is not limited by an NPDES permit at the point of discharge. Therefore we were not required by the federal stormwater regulations to submit application forms 1 and 2f.

Sorry for taking so long to supply the information. Please let me know if you have any questions.

Thanks,

Carl

GCS: ENVIRONMENTAL

Fax: 6184514020

Dec 17 2003 13:25

P. 02

OCT 13 '92 11:10AM NATIONAL STEEL

P. 5/15

JUN 03 '92 08:30AM GCS ENVIRONMENTAL

P. 5

Public Notice of 301(g) Variance

Public Notice No.: TGM:TRK:SFN:bls/2015j.sp

Public Notice Date: MAY 28 1992

Action: Notice of a tentative decision to grant, pursuant to Section 301(g) of the Clean Water Act, a variance from BAT for nonconventional pollutants ammonia (N) and phenols (4AAP) for:

National Steel Corporation
 Granite City Division
 Granite City, Illinois
 NPDES Permit No. IL0000329

Summary: National Steel Corporation, pursuant to Sections 301(g) and 301(j)(1)(B) of the Clean Water Act (CWA) requested a variance from the best available treatment economically achievable (BAT) treatment requirements for the nonconventional pollutants ammonia (N) and phenols (4AAP) for the discharge of treated plant wastewater through Outfall 001 to Horseshoe Lake. National Steel Corporation produces coke, molten iron, steel, and finished and semi-finished rolled steel products at its Granite City Division.

Section 301(g) of the CWA authorizes the U.S. Environmental Protection Agency (U.S. EPA) to modify the BAT requirements for nonconventional pollutants provided a satisfactory demonstration is made that, among other factors, such modification will not interfere with the attainment of water quality which will assure the protection of public water supplies and aquatic life and will not pose an unacceptable risk to human health or the environment.

The Illinois Environmental Protection Agency reviewed National Steel Corporation's application and recommended that U.S. EPA approve the variance. The proposed modified effluent limitations (PMELs), which would be in effect should the variance be granted, are compared with the best practicable control technology (BPT) and best available technology economically achievable (BAT) limitations (in lbs/day):

Discharge Loadings (lbs/day) through Outfall 001

	PMELs	BPT	BAT
<u>Ammonia (N) April-October</u>			
Monthly Average	500	1013	94
Daily Maximum	900	3040	303
<u>Ammonia (N) November-March</u>			
Monthly Average	500	1013	94
Daily Maximum	900	3040	303
<u>Phenols (4AAP)</u>			
Monthly Average	5	32.4	0.49
Daily Maximum	10	96.7	0.98

The PMELs are reflective of the effluent loadings presently being reported and will meet applicable Illinois water quality standards at the outfall. U.S. EPA's review of the available information indicates that water quality

standards are protective of aquatic life and human health. U.S. EPA has analyzed the merits of National Steel Corporation's variance request and believes that it satisfies all of the statutory criteria. Therefore, Region V of the U.S. EPA is proposing to grant National Steel Corporation's request for a Section 301(g) variance for its Granite City Division for ammonia(N) and phenols(4AAP).

Procedures for Final Determination

Interested persons may submit written comments on the Tentative Decision to grant the Section 301(g) variance to the U.S. EPA Regional Administrator within thirty (30) days of the date of this public notice at the address cited below. Comments should be specific and include the basis and relevant facts upon which they are made. Anyone who is interested in commenting on this Tentative Decision should be aware of the obligation to raise issues, and to provide supporting information, for consideration during this public comment period in order to raise those issues in a subsequent appeal. All comments will be considered in the formulation of a final decision on this variance.

A public meeting on this tentative decision will be held if significant public interest in a public meeting is expressed. Interested persons should submit their requests for a public meeting along with issues of concern.

Following the close of the public comment period, U.S. EPA will make a final decision on National Steel Corporation's Section 301(g) variance request. Within 30 days following the issuance of U.S. EPA's final decision, any interested person may request an adjudicatory hearing with respect to issues raised for consideration during the public comment period (40 CFR 124.76). An appeal of the final decision of the variance may be made under 40 CFR 124 Subparts E and F.

The application, Tentative Decision, Tentative Decision Support Document and administrative record are available for review at U.S. EPA's Region V office at the address below and at the Illinois Environmental Protection Agency, Springfield, Illinois. A fee may be charged for copying these documents.

ADDRESSES: All comments regarding the Tentative Decision which are submitted on or before 30 days after publication of this notice will be considered and should be sent to Regional Administrator, U.S. Environmental Protection Agency, Attention: Water Division (5HQ-163) 77 West Jackson Boulevard, Chicago, Illinois 60604 with a copy to the Illinois Environmental Protection Agency, Division of Water Pollution Control, 2200 Churchill Road, Springfield, Illinois 62794-9276.

Request for further information regarding this variance decision and for copies of the Tentative Decision and Tentative Decision Support Document may be directed to Mr. Jack Newman, U.S. Environmental Protection Agency, 77 West Jackson Boulevard, Chicago, Illinois 60604.

SFM:b1s/2015j.sp



Granite City Works
United States Steel
20th & State Streets
Granite City, Illinois 62040
(618) 451-3456

REC - Log In
IEPA EXHIBIT
No. 37

April 5, 2004

RECEIVED
APR 07 2004

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY
BOW/WPC/PERMIT SECTION

CERTIFIED MAIL NO 7001 2510 0006 4580 4258
RETURN RECEIPT REQUESTED

Mr. Blaine Kinsley, P.E.
Acting Industrial Unit Manager
Permit Section
Illinois Environmental Protection Agency
Division of Water Pollution Control
1021 North grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

RECEIVED
APR 09 2004
Environmental Protection Agency
WPC--Permit Log In

RE: NPDES Permit No. IL0000329 Renewal;

Dear Mr. Kinsley: (LF)

Per our previous discussion, attached for you information/use are the outstanding issues, as I understand them, as well as a draft permit based on my understanding.

United States Steel Corporation, Granite City Works would like to proceed with the subject permit renewal which incorporates an internal monitoring point (Outfall 001C) for the landfill leachates, per our meeting with the Agency on June 26, 2003.

Should you have any questions or need additional information please contact me at 618-451-3013

Sincerely,

Carl Cannon
Environmental Manager

RECEIVED
APR 07 2004

UNITED STATES STEEL CORPORATION
GRANITE CITY WORKS
NPDES PERMIT RENEWAL ISSUES

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY
BOW/WPC/PERMIT SECTION

1. Outfall 001: Oil & Grease 30-day average lbs./day: GCW requests the 80" Hot Strip Mill be included in the allowable calculation for the 30 day average. The industry standard is to allow for ½ of the daily max.
2. Outfall 001: Available Cyanide: 30-day average decreased form 0.02 to 0.0052 ppm to reflect the current water quality standard. GCW requests sampling method OIA-1677 be specified with a one day per month sampling frequency.
3. Outfall 001: Ammonia: Water quality standard changed to a three season allowable.
4. Outfall 001: 301(g): GCW previously requested to continue to incorporate the variance in the permit for ammonia and phenol.
5. Outfall 001: Zinc: GCW previously requested the central treatment exemption for zinc. GCW proposes 55.6 lbs/day daily maximum and 11.5 lbs/day 30-day average, which is based on actual plant data, see the attached graph.
6. Outfall 001A: GCW requests the central treatment exemption for B(a)P and Naphthalene. GCW proposes 0.15 lbs/day daily max, and 0.135 lbs/day (99 percentile) 30-day average for B(a)P. GCW proposes 0.10 lbs/day daily max, and 0.085 lbs/day (99 percentile) 30-day average for naphthalene. The daily maximums are based on actual plant data, see the attached graphs. The 30 day averages are estimated based on actual plant data. The plant data is sampled at a frequency on once per month, therefore actual 30 day averages is not available. This includes additional allowable loading associated the addition of water used for the optimization of the coke plant biological treatment system per Section 420.13(a)(3). Should IEPA not agree with the applicability of the central treatment exemption, then GCW requests a two-year compliance schedule to install additional controls on the By-products wastewater treatment plant.
7. Outfall 001C: NSC landfill leachate: GCW previously requested a new NPDES monitoring point prior to entering the steelworks ditch.

NPDES Permit No. IL0000329

Special Conditions

SPECIAL CONDITION 1. The pH shall be in the range 6.0 to 9.0. The monthly minimum and monthly maximum values shall be reported on the DMR form.

SPECIAL CONDITION 2. Samples taken in compliance with the effluent monitoring requirements for outfall 001A shall be taken at a point representative of the discharge, but prior to mixing with blast furnace wastewater. Samples taken in compliance with the effluent monitoring requirements, for outfall 001B shall be taken at a point representative of the discharge of the Cold Rolling Mill Wastewater, but prior to mixing with other wastewaters. Samples taken for outfall 001C shall be taken at a point representative of the discharge of this National Steel Corp. and United Sates Steel Corp. Landfill Leachate Wastewater but prior to mixing with other wastewaters.

SPECIAL CONDITION 3. The use of operation of this facility shall be by or under the supervision of a Certified Class K operator.

SPECIAL CONDITION 4. The Permittee shall be required to conduct an effluent toxicity evaluation prior to the renewal of this permit. Elements of the toxicity evaluation should include but not be limited to the following:

A. Aquatic Toxicity Screening

Acute Toxicity – The initial acute toxicity testing should be run on at least three trophic levels of aquatic species (fish, invertebrates and plants) which represent the aquatic community for the receiving stream. Suggested species include the Fathead Minnow, Ceriodaphnia, and Selenastrum Capricornufum. All tests should be done in accordance with "Measuring Acute Toxicity of Effluents to Freshwater and Marine Organisms (Fourth Edition)", (USEPA/600-4-90/027) and "Environmental Effects Tests Guidelines" (USEPA/560-6-82/002). The IEPA specification and guidelines for these tests, given in "Effluent Biomonitoring and Toxicity Assessment – Aquatic Life Concerns," must also be met.

Chronic Toxicity – The initial short-term chronic toxicity testing should be run on at least three trophic levels of aquatic species (fish, invertebrates and plants) which represent the aquatic community for the receiving stream. Suggested species include Fathead Minnow, Ceriodaphnia, and Selenastrum Capricornutum (green algae). All tests should be done in accordance with "Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Water to Freshwater Organisms (Second Edition)", (USEPA/600/4-89/001). The IEPA specifications and guidelines for these tests, given in "Effluent Biomonitoring and Toxicity Assessment – Aquatic Life Concerns," must also be met.

Testing shall be conducted on fish and algae over a 96-hour period while invertebrates should be tested over a 48-hour period. Tests should be performed on 100% effluent.

B. Human Health Effects

Chemical specific testing shall analyze the effluent for 113 priority pollutants (see 40 CFR 136 Appendix A, Methods 624 and for non-priority pollutants (except for those already being monitored and limited on page 3). Samples shall be handled, prepared, and analyzed by GC/MS in accordance with 40 CFR 136 Methods 624 and 625 (October 26, 1984 Federal Register). GC/MS procedures for direct injection of water samples using appropriate GC columns such as 10%

*use Bob
if he
thinks this
should be
done yet*

BMB



United States Steel Corporation
Granite City Works
20th & State Streets
Granite City, IL 62040
618 451 3241
fax: 618 451 3707
email: mstein@uss.com

Merle R. Stein
General Manager

IEPA EXHIBIT

No. 45

July 22, 2004

CERTIFIED MAIL NO 7001 2510 0000 1760 2437
RETURN RECEIPT REQUESTED

RECEIVED
JUL 23 2004

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY
BOWANPOI/PERMIT SECTION

Mr. Blaine Kinsley, P.E.
Manager, Industrial Unit
Permit Section
Division of Water Pollution Control
Illinois Environmental Protection Agency
1021 Grand Avenue East
P O. Box 19276
Springfield, Illinois 62794-9276

Dear Mr. Kinsley:

Re. United States Steel Corporation - Granite City Works
NPDES Permit Number IL0000329

United States Steel Corporation - Granite City Works (GCW) has reviewed the current NPDES permit and requests that the following changes be incorporated into the NPDES permit renewal.

*refers to
existing
SC#s*

- OK* 1. Remove special condition 8 and the permit limitation for total chlorine residual: Breakpoint chlorination is no longer necessary at GCW and has not been performed since the early 1980's. GCW has no plans to use breakpoint chlorination in the future.
- NO* 2. Remove special condition 4. The specified monitoring has been performed during the last two permit renewal cycles. GCW believes there is sufficient data available and no additional testing is needed.
- OK* 3. Remove special condition 5: The oil and grease composite sampling has been performed semi-annually since 1998. The data demonstrate that individual grab samples are significantly less than 75 mg/l, and the composite samples are significantly less than the permit limitations. GCW has demonstrated consistent control of the oil and grease parameter. Additional composite testing is not needed.
- OK* 4. Remove special condition 12: Special condition 12 is not applicable to the current ammonia limitations.
- NO Ste planning dot* 5. GCW requests that the load limits for iron (dissolved), fluoride and cyanide (available/weak acid dissociable) be removed from the permit. These are water quality based limitations and as such the concentration limitations are protective of the environment.

Thank you in advance for your consideration of these issues. Should you require additional information, please contact Carl Cannon at (618) 451-3013.

Sincerely,

Merle R. Stein
General Manager
Granite City Works
United States Steel Corporation

jm

US Steel-Granite City Works
 IL0000329
 Beth M. Burkard

Page 38/40

08-19-2004

Response: This is acceptable. The graphs are attached to the letter from US Steel, dated April 5, 2004. The graphs show actual plant data. The two graphs show the daily maximum load limits for each pollutant for each month from January 1998, to October 2003. The daily maximum load limit selected for each parameter is the maximum value on each graph. This is appropriate, as these two parameters are only tested once per month. Because these two parameters are tested only once per month, a 30-day average load limit is not necessary. The proposed daily maximum value for each parameter is 0.15 and 0.10 lbs/day for B(a)P and naphthalene, respectively.

7) Outfall C01: NSC landfill leachate: GCW previously requested a new NPDES monitoring point prior to entering the steelworks ditch.

Response: Outfall C01 will be added to the renewed permit. Outfall C01 will be sampled after leaving the landfill, but before mixing with any other wastewater sources. Only flow will be limited for C01, as the wastestream will undergo treatment before final discharge. The data submitted on Form 2C (for C01) of the application does not indicate any pollutant of concern that will not be sufficiently treated in the treatment works before discharge. Internal Outfall C01 will be named Landfill Leachate Wastewater. This will indicate that this wastestream is for waters from the two landfills still owned by National Steel Corp and the other landfills owned by US Steel.

Response to Letter, Dated July 22, 2004 from Merle Stein

1) Remove special condition 8 and the permit limitation for total chlorine residual: Breakpoint chlorination is no longer necessary at GCW and has not been performed since the early 1980s. GCW has no plans to use breakpoint chlorination in the future.

Response: (See also page 28 of notes.) In a meeting of July 8, 2004, Mr. Carl Cannon stated that breakpoint chlorination is not used at GCW, and will never in the foreseeable future be used again. Thus, the special condition (8 in the previous permit) stating that TRC shall be sampled when breakpoint chlorination is occurring will be removed, as will the limits for TRC.

2) Remove special condition 4: The specified monitoring has been performed during the last two permit renewal cycles. GCW believes there is sufficient data available and no additional testing is needed.

Response: The Planning Department memo of July 9, 2003, states:

“A review of recent whole effluent toxicity test results found that no acute toxicity was present in the effluent. The June 19, 2003 memo from Aly Grady recommends that one round of acute testing using *Ceriodaphnia* and fathead minnow be conducted 12 months prior to the expiration of the permit.”

This significantly reduces the burden of toxicity testing, as the Human Health Effects portion, the *Selenastrum capricornutum* (green algae) portion of the Acute Toxicity

US Steel-Granite City Works
IL0000329

Page 39/40

Beth M. Burkard

08-19-2004

Screening, and the Chronic Toxicity Screen have all been removed, leaving only the Acute Toxicity Screening for *Ceriodaphnia* and fathead minnow. This is only required once in the length of the permit.

3) Remove special condition 5: The oil and grease composite sampling has been performed semi-annually since 1998. The data demonstrate that individual grab samples are significantly less than 75 mg/L, and the composite samples are significantly less than the permit limitations. GCW has demonstrated consistent control of the oil and grease parameter. Additional composite testing is not needed.

Response: Due to the frequent grab sampling, composite testing is redundant. The table below demonstrates that the composite sampling is represented by the 30-day average value of the twice per week grab sampling. Continuation of the composite testing is not necessary. The special condition and the corresponding requirements will be removed in the renewed permit.

Table: Composite Testing of Oil & Grease

Date	Value with Composite (mg/L)	Monthly Average of Grabs (mg/L)
December, 2003	6	6
June, 2003	7	<5
December, 2002	0.9	<5
June, 2002	1	<5
December, 2001	1	<5
June, 2001	1	<5
December, 2000	1	<5
June, 2000	1	<5

4) Remove special condition 12: special condition 12 is not applicable to the current ammonia limitations.

Response: Special condition 12 states "The permittee is prohibited from effluent acidification to lower effluent pH if the purpose is to increase the total ammonia nitrogen concentration." It is no longer necessary for the ammonia limits that will be included in the renewal permit. This special condition will not be included in the renewal.

5) GCW requests that the load limits for iron (dissolved), fluoride, and cyanide (available/weak acid dissociable) be removed from the permit. These are water quality based limitations and as such, the concentration limitations are protective of the environment.

Response: The Planning Department analysis for Water Quality Based Effluent Limits (dated July 9, 2003) states that limits should be included in the permit for Cyanide (WAD), Fluoride, Iron (Dissolved), and Zinc, because each of these components has a reasonable potential to exceed water quality standards. This is based on data submitted by the Permittee, analyzed by the Planning Department.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

No. 51

Subject: US Steel-Granite City Works

Page 1 of 3

Data: IL0000329

Reviewed By: Beth M. Burkard

Date: 10/22/2004, 11/1/2004

UNITED STATES STEEL CORPORATION
GRANITE CITY WORKS
NPDES PERMIT DRAFT CLEAN-UP ISSUES

1. Page 1 of fact sheet. Our cold mill has always been a once through system.

Response:

Change Fact Sheet to remove the line stating that the system has been modified to a once through system.

2. General: Some limits are different between the fact sheet and public notice draft.

Response:

Checked notes and changed Draft Permit and Fact Sheet to reflect correct limits.

3. Outfall 001: Significant figures: request Iron (total) 30 day average of 2 as in previous permit vs. 2.0 mg/l; daily maximum of 4 vs. 4.0 mg/l.

Response:

The limits are promulgated in the regulations as 2.0 mg/L for monthly average concentration limit for Iron (total). The limit in the permit must be consistent with the regulations. Regardless of how many significant digits a limit is assigned in the permit, the permittee must report the value, without rounding, up to six decimal places (eight characters). If the lab reports to seven or more decimal places (nine or more characters), then the permittee may report on the DMR a value rounded to the sixth decimal place (eight total characters). Please see "Guidelines for the Completion of Preprinted Discharge Monitoring Report Forms", Completion, #5.

4. Outfall 001: Request Lead (total) 30 day average of 0.09 mg/l be removed, sampling is on a quarterly basis. Has not been in previous permits.

Response:

The purpose of the monthly average limit is to verify that, should the permittee monitor more frequently than required, and obtain sufficient analyses to produce a monthly average, the Agency may verify compliance with the limit. The permittee is not required to sample more than once per quarter, but should they choose to monitor more than once per month, they shall provide the Agency with data indicating the results of those analyses. See also Attachment H-Standard Conditions.

5. Outfall 001: Request Cyanide (total) sample type be a composite as in previous permit vs. a grab, since previous permit and data collected has been based on composite sampling. Significant figures: request a 30 day average of 0.1 as in previous permit vs. 0.10 mg/l. The daily maximum of 0.2 as in previous permit vs. 0.20 mg/l.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

Subject: US Steel-Granite City Works
Data: IL0000329
Reviewed By: Beth M. Burkard

Page 2 of 3

Date: 10/22/2004, 11/1/2004

Response:

40 CFR Part 136 specifies that grab samples must be collected for cyanide. Per 40 CFR §136.3, the Permittee may apply for an alternative test procedure from those test procedures established in 40 CFR 136. Regarding significant digits, please see response to #3 above.

6. Outfall 001: Request Cyanide (available) sample type should be composite as in previous permit for weak acid dissociable cyanide, and not grab, since data collected was based on composite samples. Outfall 001: Significant figures: Request Phenol (4AAP) 30 day average of 5 as in previous permit vs. 5.0 lbs/day; daily maximum of 0.1 vs. 0.10 mg/l as in previous permit.

Response:

Regarding Cyanide, Available: 40 CFR Part 136 specifies that grab samples must be collected for cyanide.

Regarding Phenol (4AAP): The concentration limit established in 35 IAC 302.208 is 0.1 mg/L. The permit writer edited the Draft Permit and Fact Sheet to reflect consistency with the regulation. The load limit of 5.0 lb/day will remain in the permit. It is Permit Section protocol to round load limits that are between 1 and 10 to the nearest tenth of a pound.

7. Outfall 001: Significant figures: Request Fluoride of 4 as in previous permit vs. 4.0 mg/l.

Response:

The limit for Fluoride is provided in the Illinois Pollution Control Board Adjusted Standard AS 90-4. The Board established an alternative limit of 4.0 mg/L.

8. Outfall B01: Request Flow sample frequency of 2 days/year as in previous permit vs. continuous.

Response:

The permit writer edited the Draft Permit to read Measure When Monitoring to clarify the flow reporting requirements.

9. Outfall A01: Is there going to be a 30 day average for B(a)P and Naphthalene? If so, request 0.085 lb/day for naphthalene and 0.135 for B(a)P per our previous submittal of 99 percentile of daily maximum data. Propose we monitor only the 30 day average without a limitation for this permit cycle and review the need and appropriate 30 day average limitations based on the central treatment exemption.

Response:

The permit will only contain daily maximum limits for Benzo(a)Pyrene and Naphthalene; monthly average load limits were included in error. The permit writer edited the Draft Permit to reflect this correction.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

Subject: US Steel-Granite City Works
Data: IL0000329
Reviewed By: Beth M. Burkard

Page 3 of 3

Date: 10/22/2004, 11/1/2004

10. Outfall 001: New weekly average limitation for ammonia nitrogen: Review of data shows for 3/11/03 (7.5 mg/l) and 3/12/03 (6.4 mg/l) weekly average would have been 6.95 mg/l vs. proposed limitation of 7.0 mg/l. request weekly average limitations be removed. If they remain, request the limitation be 7 vs. 7.0 mg/l.

Response:

The limits for Ammonia-Nitrogen are based upon methods outlined in 35 Illinois Administrative Code (IAC) Section 355. Weekly average load limits are determined using the chronic standard (monthly average) developed in Section 355, as described in 35 IAC 302.212(b)(3). Because the permittee is required to sample more than once per week, the weekly average limit will remain.

11. Page 5 of fact sheet: Second paragraph, Outfall A01 enters the blast furnace lagoon only.

Response:

Fact Sheet has been updated to reflect this correction.

12. Page 5 of fact sheet: Second paragraph, the sentence starting with "With the exception of wastewater from the Blast iron furnaces" Change blast iron furnaces to "Iron Making complex including stormwater".

Response:

Fact Sheet has been updated to reflect this correction.

13. Flow diagram: Propose submittal of and update flow diagram showing internal monitoring point C01 with contributions from Nation Steel Corp. section III and IV landfills and United States Steel corp. landfill section V as part of the permit record.

Response:

Permittee is mailing to Agency. Will include updated flow diagram in records. Agency received updated flow diagram on October 20, 2004.

Total residual Chlorine: We do use large quantities of city water; the major users are the #1 and #2 continuous casters and the boilers. However, due to the nature of our system, i.e. the surface impoundments, the total chlorine residual has not been an issue at Outfall 001.

Response:

Notes have been updated to indicate that city water is used, and that because the treatment works will remove chlorine to below detectable limits, the TRC limits and conditions may still be removed from the permit.

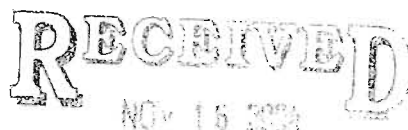
11/01/2004:

Per Unit Manager, Compliance will determine rounding/significant digit issues. Permit will contain limits of 2 mg/L rather than 2.0 mg/L.



United States Steel Corporation
Granite City Works
20th & State Streets
Granite City, IL 62040
618 451 3241
fax: 618 451 3707
email: mstein@uss.com

Merle R. Stein No. 53
General Manager



ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY
BOW/WPC/PERMIT SECTION

November 15, 2004

CERTIFIED MAIL NO 7004 1160 0002 4231 5163
RETURN RECEIPT REQUESTED

Mr. Blaine Kinsley, P.E.
Manager, Industrial Unit
Permit Section
Division of Water Pollution Control
Illinois Environmental Protection Agency
1021 Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

Dear Mr. Kinsley:

Re: United States Steel Corporation - Granite City Works
NPDES Permit Number IL0000329

United States Steel Corporation - Granite City Works (GCW) has reviewed the November 4, 2004 draft NPDES permit and provides the following comments.

1. The Granite City Works Stabilization Ponds are an integral part of the Central Waste Water Treatment System. The Stabilization Ponds are the primary means of organics stabilization by Natural Biological Processes. The Granite City Works Stabilization Ponds are facultative, using both aerobic and anaerobic breakdown of organic material. In the upper aerobic layer, a unique relationship exists between bacteria and algae. The bacteria metabolize organic matter and releases nutrients, those nutrients are then used by the algae with energy from sunlight. The algae in turn releases oxygen for use by the bacteria. The algae undergo respiration at night and do not release oxygen. The resulting variation in the oxygen content in the surface water of the stabilization ponds will likely affect the biological activity of the aerobic bacteria as well as the facultative bacteria in the transition zone between aerobic and anaerobic.

Based on this daily variation, Granite City Works is requesting the total cyanide sample type to remain as a 24 hour composite

2. Granite City Works has reviewed our DMR data and compared it to the draft NPDES Permit. The review indicates Granite City Works would have exceeded the 30 day average Spring/Fall Ammonia-Nitrogen Limitation of 2.8 mg/l during March 2002 (2.93 mg/l) and March 2003 (4.47 mg/l)

Granite City Works requests that credit be given for attenuation of ammonia-nitrogen within Horseshoe Lake for Spring/Fall period, as provided in the previous permit.

Thank you in advance for your consideration of these issues. Should you require additional information, please contact Carl Cannon at (618) 451-3013.

Sincerely,

Merle R. Stein
General Manager
Granite City Works
United States Steel Corporation

jm

IEPA EXHIBITNo. 54

From: Carl E Cannon <CECannon@uss.com>
To: <Beth.Burkard@epa.state.il.us>
Date: 12/3/2004 9:37:27 AM
Subject: NPDES permit

Beth-

Thank you for your quick response. Below please find some additional information regarding your 11/30/04 email.

Cyanide:

We believe the alternative for mathematical composites is a good solution.

Ammonia:

GCW filed a petition for an adjusted standard with regard to the general use standards for ammonia on 1/16/97 (PCB 92-161). As part of the negotiation process with the IEPA, the water quality planning group reviewed the discharge into Horseshoe Lake and allowed for the attenuation of ammonia in an 85 acre area of the lake which was still protective of the water quality. The NPDES permit ammonia discharge limitation was adjusted accordingly. As a result, GCW withdrew the petition on 6/4/98.

We are requesting the same analysis be performed by the water quality planning group to allow for attenuation within the area of the discharge, which is still protective of the water quality of Horseshoe Lake. We are requesting this for either the Spring/Fall period or for the month of March, whichever the water quality planning group determines is appropriate.

Additionally, we are requesting to preserve the 301(g) variance for Ammonia through the special condition provided in the previous permit. The 301(g) variances for ammonia and phenol in the previous permit stated: "Special Condition 9. For purposes of this permit load limits for Ammonia (as N) and Phenol (4AAP) have been based on actual plant discharges and are included in accordance with a 301(g) variance approved by the USEPA. Any changes to these load limits can only be made following Public Notice and opportunity for hearing." We believe this language is appropriate since the load limits are based on water quality limitations as in the original 301(g) based permit and the previous permit. The load limits in the previous permit were adjusted from the original 301(g) variance based on new water quality limitations, and the above Special Condition 9 was included in the permit. Likewise, the existing load limits for Ammonia are being adjusted from the previous permit limitations based once again on new water quality limitations, and we believe the Special Condition should continue to include Ammonia as part of the 301(g) variance in the new permit.

Thank You Again for your assistance in our permit renewal.
 Carl

Scott:

Would you please review this and let me know if there is an alternative value for March for this facility? The NPDES Permit has been to 15-day, and this is one of the concerns the permit has. Please call me if you need additional information. Thank You!

Beth M.
 Burkard



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

ROD R. BLAGOJEVICH, GOVERNOR RENEE CIPRIANO, DIRECTOR

Memorandum

DATE: 6 December 2004
TO: Beth Burkard
FROM: Scott Twait *ST*
SUBJECT: Ammonia WQBELs
US Steel Corporation – Granite City NPDES Permit No. IL0000329
(Madison County)

This memorandum readdresses the ammonia recommendation in Bob Mosher's memorandum to Ukanno Foxworth on July 9, 2003. Since this discharge is to a large lake, a small amount of mixing is available, as per Bob Mosher's February 4, 1998 memorandum.

I recommend that a March 30 day average permit limit of 4.0 mg/L be placed in the permit as a water quality based effluent limit, which takes into account a small amount of mixing. This is based on the best degree of treatment. The weekly average permit limit should be 10.0 mg/L, based on 2.5 times the chronic limit. A ZID is not available and the daily maximum permit limit should remain at the limit contained in the July 9, 2003 memorandum of 15.0 mg/L.

These recommendations reflect a water quality standards perspective only and should not be construed as being inclusive of all factors that must be taken into consideration by the permit writer.

cc: Bob Mosher
Nick Mahlandt
Bob Hite
Chron



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

217/782-0610

ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

DEC 14 2004

United States Steel Corporation
Granite City Works
20th and State Streets
Granite City, Illinois 62040

Re: United States Steel Corporation
NPDES Permit No. IL0000329
Public Notice Permit

Gentlemen:

Please post the attached Public Notice for the subject discharge for at least a period of thirty days from the date on the Notice in a conspicuous place on your premises.

We have enclosed a copy of the draft NPDES permit on which this official Public Notice is based. If you wish to comment on the draft permit, please do so within 30 days of the Public Notice date. If there are any questions, please contact Beth M. Burkard at the indicated telephone number and address.

The Agency has examined the ammonia limits for March and determined that a small amount of mixing is available. The Agency recommends that a March 30 day average permit limit of 4.0 mg/L be placed in the permit as a water quality based effluent limit, which takes into account a small amount of mixing. The weekly average permit limit should be 10.0 mg/L, based on 2.5 times the chronic limit. A ZID is not available for ammonia and the daily maximum permit limit should remain at the limit contained in the draft permit of 15.0 mg/L.

Thank you for your cooperation.

Sincerely,

Blaine A. Kinsley, P.E.
Manager, Industrial Unit, Permit Section
Division of Water Pollution Control

BAK:BMB:04090101.bah

Attachments: Draft Permit, Public Notice/Fact Sheet

cc: Records Unit
Compliance Assurance Section
Collinsville Region
SIMAPC

NPDES Permit No. IL0000329
 Notice No. BMB:04090101.bah

DRAFT

Public Notice Beginning Date: December 19, 2004

DEC 19 2004

Public Notice Ending Date: January 18, 2005

PUBLIC NOTICE

National Pollutant Discharge Elimination System (NPDES)
 Permit Program

Draft Reissued NPDES Permit to Discharge into Waters of the State

Public Notice/Fact Sheet Issued By:

Illinois Environmental Protection Agency
 Bureau of Water,
 Division of Water Pollution Control
 Permit Section
 1021 North Grand Avenue East
 Post Office Box 19276
 Springfield, Illinois 62794-9276
 217/782-0610

Name and Address of Discharger:

United States Steel Corporation
 Granite City Works
 20th and State Streets
 Granite City, Illinois 62040

Name and Address of Facility:

United States Steel Corporation
 Granite City Works
 20th and State Streets
 Granite City, Illinois 62040
 (Madison County)

The Illinois Environmental Protection Agency (IEPA) has made a tentative determination to issue a NPDES permit to discharge into the waters of the state and has prepared a draft permit and associated fact sheet for the above named discharger. The Public Notice period will begin and end on the dates indicated in the heading of this Public Notice/Fact Sheet. The last day comments will be received will be on the Public Notice period ending date unless a commentor demonstrating the need for additional time requests an extension to this comment period and the request is granted by the IEPA. Interested persons are invited to submit written comments on the draft permit to the IEPA at the above address. Commentors shall provide his or her name and address and the nature of the issues proposed to be raised and the evidence proposed to be presented with regards to those issues. Commentors may include a request for public hearing. Persons submitting comments and/or requests for public hearing shall also send a copy of such comments or requests to the permit applicant. The NPDES permit and notice number(s) must appear on each comment page.

The application, engineer's review notes including load limit calculations, Public Notice/Fact Sheet, draft permit, comments received, and other documents are available for inspection and may be copied at the IEPA between 9:30 a.m. and 3:30 p.m. Monday through Friday when scheduled by the interested person.

If written comments or requests indicate a significant degree of public interest in the draft permit, the permitting authority may, at its discretion, hold a public hearing. Public notice will be given 45 days before any public hearing. Response to comments will be provided when the final permit is issued. For further information, please call Beth M. Burkard at 217/782-0610.

The applicant is engaged in production of flat rolled steel products in an integrated steel mill (SIC 3312, 3316, and 2999). Plant operation results in an average discharge of 25 MGD of treated process wastewater from outfall 001, 0.455 MGD of coke by-products wastewater from outfall A01, 0.604 MGD of cold rolling mill wastewater from outfall B01, and 0.20 MGD of landfill leachate wastewater from outfall C01.

The following modification is proposed: This facility was purchased from National Steel Corp. by United States Steel, with the exception of Landfill III and Landfill IV. The facility no longer use Sintering, and Sulfuric Acid Pickling System has been removed. Internal outfall C01 has been added, for the landfill leachate, prior to treatment and discharge with outfall 001.

Application is made for new and existing discharge(s) which are located in Madison County, Illinois. The following information identifies the discharge point, receiving stream and stream classifications:

Outfall	Receiving Stream	Latitude	Longitude	Stream Classification	Biological Stream Characterization
001	Horseshoe Lake	38° 41' 31" North	90° 06' 28" West	General Use	Not Rated

To assist you further in identifying the location of the discharge please see the attached map.

The stream segment receiving the discharge from outfall 001 is on the 303 (d) list of impaired waters. The following parameters have been identified as the pollutants causing impairment:

Pollutants	Potential Contributors
PCBs, pH, suspended solids, excessive algal growth, ammonia (unionized), nutrients, phosphorus, total ammonia-N	Agriculture, crop-related sources, non-irrigated crop production, habitat modification, stream bank modification/destabilization

The discharge(s) from the facility shall be monitored and limited at all times as follows:

Outfall: 001 Treated Process Wastewater

PARAMETER	LOAD LIMITS lbs/day DAF (DMF)		REGULATION	CONCENTRATION LIMITS mg/l		REGULATION
	30 DAY AVERAGE	DAILY MAXIMUM		30 DAY AVERAGE	DAILY MAXIMUM	
Flow (MGD)				Measure		
pH				6.0 - 9.0		35 IAC 304.125
CBOD ₅	2085	4170	35 IAC 304.120	10	20	35 IAC 304.120
Total Suspended Solids	2502	5004	35 IAC 304.120	12	24	35 IAC 304.120
Oil & Grease	1511	3492	40 CFR 420	15	30	35 IAC 304.124
Iron (total)	417	834	35 IAC 304.124	2	4	35 IAC 304.124
Iron (dissolved)		209	35 IAC 302.208		1	35 IAC 302.208
Lead (total)	5.6	17	40 CFR 420	0.09	0.4	35 IAC 302
Zinc (total)	12	56	40 CFR 420	0.17		35 IAC 302.208
Cyanide (total)	19	35	40 CFR 420	0.1	0.2	35 IAC 304.124
Cyanide (available by 0IA 1677)	1.1	4.6	35 IAC 302.208	0.01	0.02	35 IAC 302.208
Phenol (4AAP)	5.0	10	Variance of 301(g) of CWA		0.1	35 IAC 302.208
Fluoride		834	IPCB AS 90-4		4	IPCB AS 90-4
Ammonia Nitrogen*						
Spring/Fall	584	3128	35 IAC 355	2.8	15	35 IAC 355
Summer	459	3128	35 IAC 355	2.2	15	35 IAC 355
Winter	1501	3128	35 IAC 355	7.2	15	35 IAC 355
March	834	3128	35 IAC 355	4.0	15	35 IAC 355

*Spring/Fall is April-May and September-October. Summer is June-August. Winter is November-February. Weekly average limits apply for Spring/Fall, Summer, and March. Weekly average limits are as follows: Spring/Fall: 7.0 mg/L; Summer: 5.5 mg/L; March: 10 mg/L. No weekly average limit applies in Winter.

DEC 19 2008
PUBLIC NOTICE

PARAMETER	LOAD LIMITS lbs/day DAF (DMF)			CONCENTRATION LIMITS mg/l		
	30 DAY AVERAGE	DAILY MAXIMUM	REGULATION	30 DAY AVERAGE	DAILY MAXIMUM	REGULATION
Outfall: A01 - Coke By-Products Wastewater						
Flow (MGD)				Measure		
Naphthalene		0.10	40 CFR 420			
Benzo(a)pyrene		0.15	40 CFR 420			
Total Suspended Solids					Monitor	
Outfall: B01 - Cold Rolling Mill Wastewater						
Flow (MGD)				Measure		
Tetrachloroethylene		1.1	40 CFR 420			
Naphthalene		0.73	40 CFR 420			
Outfall: C01 - Landfill Leachate Wastewater						
Flow (MGD)				Measure		

Load Limit Calculations:

- A. Load limit calculations for the following pollutant parameters were based on an average flow of 25 MGD and using the formula of average flow (MGD) X concentration limit (mg/l) X 8.34 = the average or maximum load limit (lbs/day): for outfall 001, CBOD₅, Total Suspended Solids, Iron (total), Iron (dissolved), Cyanide (available), Fluoride, and Ammonia as Nitrogen.
- B. Production based load limits were calculated by multiplying the average production by the effluent limit contained in 40 CFR 420. Production figures utilized in these calculations for the following subcategories are as follows:

<u>Subcategory</u>	<u>Production Rate</u>
Subpart A - Coke Making Subcategory	1619 tons/day
Subpart C - Iron Making Subcategory	7192 tons/day
Subpart D - Steel Making Subcategory	8565 tons/day
Subpart F - Continuous Casting Subcategory	8433 tons/day
Subpart G - Hot Forming Subcategory	9187 tons/day
Subpart I - Acid Pickling Subcategory	2370 tons/day
Subpart J - Cold Forming Subcategory	2198 tons/day
Subpart K - Alkaline Cleaning Subcategory	2451 tons/day
Subpart L - Hot Coating Subcategory	2451 tons/day

For outfall 001: Oil & Grease, Lead, Zinc, Cyanide (total), and Phenol (4AAP); for outfall A01: Naphthalene and Benzo(a)pyrene; for outfall B01: Naphthalene and Tetrachloroethylene were limited using Federal production based load limits. The following sample calculation shows the methodology utilized to determine production based load limitations:

For outfall B01, Naphthalene Daily Maximum Load Limit = Effluent Limitation from 40 CFR 420.103(a)(5)-BAT x Production Rate = 0.000167 lb/1000 lb product x 2198 tons/day x (2000 lb/ton) = 0.73 lb/day = Naphthalene Daily Maximum Load Limit at outfall B01.

When several subcategories have effluent limitations for a pollutant, the load limits from each subcategory are added to obtain the total federal production based load limit.

The load limits appearing in the permit will be the more stringent of the State and Federal Guidelines.

Public Notice/Fact Sheet -- Page 4 -- NPDES Permit No. IL0000329

The following explain the conditions of the proposed permit:

Special Conditions are used to clarify discharge and monitoring requirements. Samples for each outfall shall be taken at points representative of each waste stream. A Certified Class K operator is required. An Aquatic Toxicity Screening Study must be conducted 12 months prior to permit expiration, using Ceriodaphnia and Fathead minnow. Non-compliance loads of zinc may be demonstrated to not be in violation of the permit limits by submitting calculations for zinc background credits, which will account for any zinc that is drawn into the system when the influent water is taken from the Mississippi River

Public Notice of Draft Permit

Public Notice Number BMB.04090101 bah is hereby given by Illinois EPA, Division of Water Pollution Control, Permit Section, 1021 North Grand Avenue East, Post Office Box 19276, Springfield, Illinois 62794-9276 (herein Agency) that a draft National Pollutant Discharge Elimination System (NPDES) Permit Number IL0000329 has been prepared under 40 CFR 124.6(d) for United States Steel Corporation, Granite City Works, 20th and State Streets, Granite City, Illinois 62040 for discharge into Horseshoe Lake from the United States Steel Corporation, Granite City Works, 20th and State Streets, Granite City, Illinois 62040, (Madison County). Facility is an integrated steel mill, located in Granite City, in Madison County, in Southeastern Illinois. The plant makes its own coke in on-site Coke Ovens. Two Iron Blast Furnaces are used to make molten iron. Steel is made in two Basic Oxygen Furnaces, using scrap steel and molten iron. The steel is formed into slabs by two Continuous Casters. Steel slabs are converted into rolls by an 80-inch Hot Strip Mill, pickled in a Hydrochloric Acid Pickling station, and cold formed by a Direct Application Cold-Rolling Mill. The facility also employs three Galvanizing Lines for finishing of the steel. The final product from the facility is coiled sheet steel, though some steel is sold as cast slabs or unfinished coils.

The Coke Plant By-products (Internal Outfall A01) are treated with activated sludge before entering the Blast Furnace Lagoon. Internal Outfall B01, the wastewater generated by the Cold Rolling Mill, is treated in an Oil Skimming Basin before entering the Steelworks Lagoon. Internal Outfall C01 is the leachate from the landfills at the facility, and the leachate is treated in an Oil Skimming Basin, and then treated in the Steelworks Lagoon. With the exception of wastewater from the Blast Iron Furnace complex including stormwater, all other wastewater sources enter an Oil Skimming Basin, and then are treated in the Steelworks Lagoon, including storm water, water from the pickling-scrubber, wastewater from the galvanizing lines, and all other water sources in the plant. Water generated at the Blast Iron Furnaces is directed to the Blast Furnace Lagoon, after treatment in a separate Oil Skimming Basin. Water is pumped from the Blast Furnace and Steelworks Lagoons into either the Tertiary Treatment Plant for filtration, or recycled to be used as source water for the plant. From the Tertiary Treatment Plant, the treated wastewater is pumped through a flume and into Horseshoe Lake for discharge at Outfall 001.

The application, draft permit and other documents are available for inspection and may be copied at the Agency between 9:30 A.M. and 3:30 P.M. Monday through Friday. A Fact Sheet containing more detailed information is available at no charge. For further information, call the Public Notice Clerk at 217/782-0610.

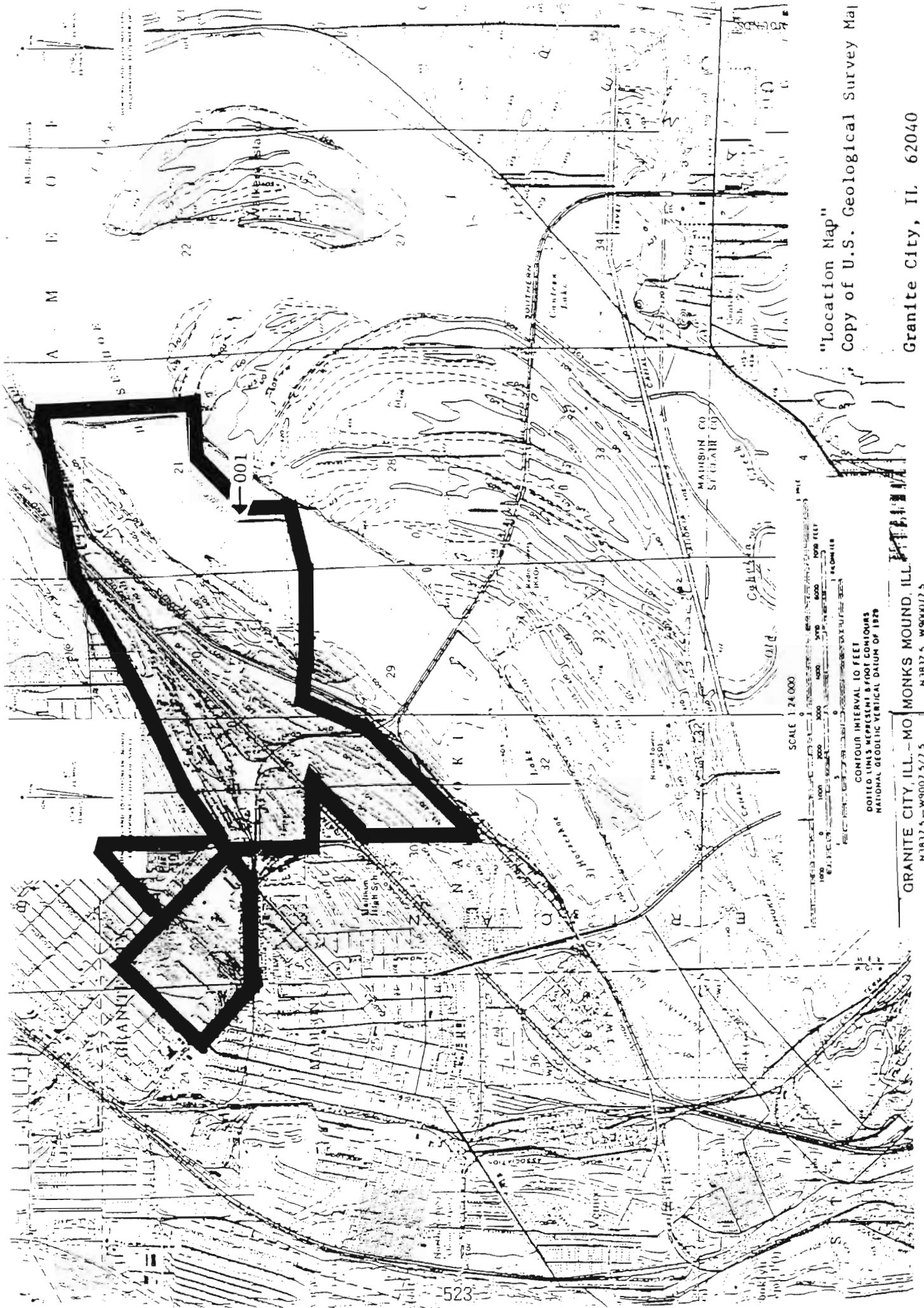
Interested persons are invited to submit written comments on the draft permit to the Agency at the above address. The NPDES Permit and Joint Public Notice numbers must appear on each comment page. All comments received by the Agency not later than 30 days from the date of this publication shall be considered in making the final decision regarding permit issuance.

Any interested person may submit written request for a public hearing on the draft permit, stating their name and address, the nature of the issues proposed to be raised and the evidence proposed to be presented with regards to these issues in the hearing. Such requests must be received by the Agency not later than 30 days from the date of this publication.

If written comments and/or requests indicate a significant degree of public interest in the draft permit, the permitting authority may, at its discretion, hold a public hearing. Public notice will be given 30 days before any public hearing.

SAK:BAK:BMB.04090101.bah

DRAFT
DEC 19 2008
PUBLIC NOTICE



"Location Map"

Copy of U.S. Geological Survey Map

Granite City, IL 62040

NPDES Permit No. IL0000329

Illinois Environmental Protection Agency

Division of Water Pollution Control

1021 North Grand Avenue East

Post Office Box 19276

Springfield, Illinois 62794-9276

DRAFT
DEC 19 2004
PUBLIC NOTICE

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

Reissued (NPDES) Permit

Expiration Date:

Issue Date:
Effective Date:

Name and Address of Permittee:

Facility Name and Address:

United States Steel Corporation
Granite City Works
20th and State Streets
Granite City, Illinois 62040

United States Steel Corporation
Granite City Works
20th and State Streets
Granite City, Illinois 62040

Discharge Number and Name:

Receiving Waters:

001 Treated Process Wastewater
A01 Coke By-Products Wastewater
B01 Cold Rolling Mill Wastewater
C01 Landfill Leachate Wastewater

Horseshoe Lake

In compliance with the provisions of the Illinois Environmental Protection Act, Title 35 of Ill. Adm. Code, Subtitle C and/or Subtitle D, Chapter 1, and the Clean Water Act (CWA), the above-named permittee is hereby authorized to discharge at the above location to the above-named receiving stream in accordance with the standard conditions and attachments herein.

Permittee is not authorized to discharge after the above expiration date. In order to receive authorization to discharge beyond the expiration date, the permittee shall submit the proper application as required by the Illinois Environmental Protection Agency (IEPA) not later than 180 days prior to the expiration date.

Alan Keller, P.E.
Manager, Permit Section
Division of Water Pollution Control

SAK:BMB:04090101 bah

NPDES Permit No IL0000329

Effluent Limitations and Monitoring

1. From the effective date of this permit until the expiration date, the effluent of the following discharge(s) shall be monitored and limited at all times as follows:

Outfall(s): 001 Treated Process Wastewater

PARAMETER	LOAD LIMITS lbs/day DAF (DMF)		CONCENTRATION LIMITS mg/l		SAMPLE FREQUENCY	SAMPLE TYPE
	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM		
Flow (MGD)	See Special Condition 1				Measure When Monitoring	
pH	See Special Condition 2		6.0 - 9.0		2/Week	Grab
CBOD ₅	2085	4170	10	20	2/Week	Composite
Total Suspended Solids	2502	5004	12	24	2/Week	Composite
Oil & Grease	1511	3492	15	30	2/Week	Grab
Iron (total)	417	834	2	4	2/Week	Composite
Iron (dissolved)		209		1	2/Week	Composite
Lead (total)	5.6	17	0.09	0.4	1/Quarter	Composite
Zinc (total)	12	56	0.17		2/Week	Composite
Cyanide (total)	19	35	0.1	0.2	2/Week	Mathematical Composite**
Cyanide (available by 0IA 1677)	1.1	4.6	0.01	0.02	2/Month	Mathematical Composite**
Phenol (4AAP)	5.0	10		0.1	2/Week	Composite
Fluoride		834		4	2/Week	Composite
Ammonia-Nitrogen*						
Spring/Fall	584	3128	2.8	15	2/Week	Composite
Summer	459	3128	2.2	15	2/Week	Composite
Winter	1501	3128	7.2	15	2/Week	Composite
March	834	3128	4.0	15	2/Week	Composite

*For Ammonia as Nitrogen, Spring/Fall is April-May and September-October. Summer is June-August. Winter is November-February. Weekly average limits will apply. For Spring/Fall, weekly average limit is 7.0 mg/L (1460 lb/day). Summer weekly average limit is 5.5 mg/L (1147 lb/day). March weekly average limit is 10 mg/L (2085 lb/day). No weekly average limit for Winter.

**See Special Condition 10.

NPDES Permit No IL0000329

Effluent Limitations and Monitoring

DRAFT
 DEC 19 2008
 PUBLIC NOTICE

1 From the effective date of this permit until the expiration date, the effluent of the following discharge(s) shall be monitored and limited at all times as follows:

Outfall(s): A01, B01, C01

PARAMETER	LOAD LIMITS lbs/day DAF (DMF)		CONCENTRATION LIMITS mg/l		SAMPLE FREQUENCY	SAMPLE TYPE
	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM		
Outfall A01 - Coke By-Products Wastewater						
Flow (MGD)	See Special Condition 1				Continuous	Measure
Total Suspended Solids				Monitor	1/Month	Composite
Naphthalene		0.10			2/Week	Composite
Benzo(a)pyrene		0.15			2/Week	Composite
Outfall: B01 - Cold Rolling Mill Wastewater						
Flow (MGD)	See Special Condition 1				When Monitoring	Measure
Tetrachloroethylene		1.1			2/Year	Grab
Naphthalene		0.73			1/Month	Grab
Outfall: C01 - Landfill Leachate Wastewater						
Flow (MGD)	See Special Condition 1				Continuous	Measure

NPDES Permit No. IL0000329

Special Conditions

SPECIAL CONDITION 1. Flow shall be reported as a daily maximum and a monthly average, and shall be reported on the monthly Discharge Monitoring Report Form.

SPECIAL CONDITION 2. The pH shall be in the range 6.0 to 9.0. The monthly minimum and monthly maximum values shall be reported on the DMR form.

SPECIAL CONDITION 3. If an applicable effluent standard or limitation is promulgated under Sections 301(b)(2)(C) and (D), 304(b)(2), and 307(a)(2) of the Clean Water Act and that effluent standard or limitation is more stringent than any effluent limitation in the permit or controls a pollutant not limited in the NPDES Permit, the Agency shall revise or modify the permit in accordance with the more stringent standard or prohibition and shall so notify the permittee.

SPECIAL CONDITION 4. The use or operation of this facility shall be by or under the supervision of a Certified Class K operator.

SPECIAL CONDITION 5. For purposes of this permit, load limits for Phenol (4AAP) have been based on actual plant discharges and are included in accordance with a 301(g) variance of the Clean Water Act approved by the USEPA. Any changes to these load limits can only be made following Public Notice and opportunity for hearing.

SPECIAL CONDITION 6. The permittee may show that an apparent noncompliance of load limits for zinc is not a violation by applying background credits for intake waters and by submission of calculations as defined below.

The load calculations for comparison to Zinc load limits shall be made as follows:

$$M = (C_e - C_r) \times F \times 8.34$$

Where:

M = Outfall 001 load limit (lbs/day)

C_e = Outfall 001 effluent concentration (mg/l)

C_r = Intake water concentration (mg/l)

F = Outfall 001 effluent flow (MGD)

Concentrations limits for outfall 001 are absolute and no background credit shall be allowed.

SPECIAL CONDITION 7. The permittee shall record monitoring results on Discharge Monitoring Report (DMR) forms using one such form for each discharge each month. Semi-annual monitoring results shall be submitted with the DMR forms for the months of June and December, and shall be submitted to the IEPA no later than July 15 and January 15 unless otherwise specified by the Agency, to the following address:

Illinois Environmental Protection Agency
Bureau of Water
Division of Water Pollution Control
Compliance Assurance Section, Mail Code #19
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-19276

SPECIAL CONDITION 8. The Permittee shall be required to conduct an effluent toxicity evaluation prior to the renewal of this permit. Elements of the toxicity evaluation should include but not be limited to the following:

A. Aquatic Toxicity Screening

Acute Toxicity - The initial acute toxicity testing should be run on at least three trophic levels of aquatic species (fish, invertebrates and plants) which represent the aquatic community for the receiving stream. Suggested species include the Fathead Minnow and Ceriodaphnia. All tests should be done in accordance with "Measuring Acute Toxicity of Effluents to Freshwater and Marine Organisms (Fourth Edition)", (USEPA/600-4-90/027) and "Environmental Effects Tests Guidelines" (USEPA/560-6-82/002). The IEPA specifications and guidelines for these tests, given in "Effluent Biomonitoring and Toxicity Assessment - Aquatic Life Concerns," must also be met.

NPDES Permit No. IL0000329

Special Conditions

DRAFT

DEC 19 2006

PUBLIC NOTICE

Testing shall be conducted on fish over a 96-hour period while invertebrates should be tested over a 48-hour period. Test should be performed on 100% effluent.

B Sampling Frequency

The test referenced above shall be performed during the final year of this permit. Upon completion, test results may be submitted with the facility renewal application.

SPECIAL CONDITION 9. Samples taken in compliance with the effluent monitoring requirements for internal outfall A01 shall be taken at a point representative of the discharge of Coke By-Products Wastewater, but prior to mixing with any other wastewater sources. Samples taken in compliance with the effluent monitoring requirements for internal outfall B01 shall be taken at a point representative of the discharge of Cold Rolling Mill wastewater, but prior to mixing with any other wastewater sources. Samples taken in compliance with the effluent monitoring requirements for internal outfall C01 shall be taken at a point representative of the discharge of Landfill Leachate Wastewater, but prior to mixing with any other wastewater sources. Samples taken in compliance with the effluent monitoring requirements for outfall 001 shall be taken at a point representative of the discharge, but before entering the receiving water.

SPECIAL CONDITION 10. Mathematical composites for Cyanide (available by OIA 1677) and Cyanide (total) shall consist of a series of grab samples collected over any 24-hour consecutive period. Each sample shall be analyzed separately and the arithmetic mean of all grab samples collected during a 24-hour period shall constitute a mathematical composite.

Health & Environmental Justice – St. Louis

No. 61

Education, Responsibility, Action
PO Box 2038, St. Louis, MO 63158

January 17, 2005

HEJ-St. Louis
Board/Directors

Daniel Berg, MD
Outgoing President

Robert Peters
Acting President

Mattie C. Moore
Vice President

Eddy Y. Kim
Secretary

Kathleen Logan Smith
Treasurer

Marsha Blaine

Lee Blount, Jr. MD

Barbara Chidester

Ida Fyrd

Judice Green

Ann Jones

John Long, LPN

Donayle Whitmore

Illinois Environmental Protection Agency
Division of Water Pollution Control
1021 N. Grand Ave. East
P.O. Box 19276
Springfield, IL 62794-9276

RE: NPDES Permit No. IL0000329
Notice Number BMB:04090101.bah
United States Steel Corporation, Granite City Works

Dear IEPA:

Please hold a public hearing on the US Steel Corp. NPDES permit referenced above and extend the comment period for three weeks on the above referenced permit. This permit warrants public involvement because it impacts directly a recreational body of water promoted by the Illinois Department of Natural Resources for boating, fishing, bird watching, and waterfowl hunting.

This permit would allow additional discharges of toxic heavy metals known to accumulate in biological organisms. Over three, five or ten years, the quantity of lead, a persistent, bioaccumulative toxin, discharged into the Lake, would add up to hundreds of pounds and may have a serious detrimental effect on organisms living in the lake. The IDNR website proclaims Horseshoe Lake's (Madison County) fishing opportunities, "The lake contains channel catfish, bass, crappie, bluegill, carp, and buffalo."¹ The lake is favored spot for fishing, often for individuals who rely on fish caught as protein sources. These individuals, who are often low income and minority individuals, are already exposed to excessive levels of PCB's from fish consumption. At least two species of fish, channel catfish and carp, carry consumption advisories.² This permit would add several other toxins to their body burden. Hunters who consume waterfowl from Horseshoe Lake could also be potentially exposed.

A public hearing would give citizens an opportunity to ask questions about the permit, voice concerns, and hear explanations.

Please consider this request.

Sincerely,

Kathleen Logan Smith, for the Board

¹ <http://dnr.state.il.us/lands/Landmgt/parks/r4/horsesp.htm>

² <http://www.idph.state.il.us/envhealth/fishadv/horseshoe.htm>

IEPA EXHIBITNo. 62

**American Bottom Conservancy
Health & Environmental Justice—St. Louis
Neighborhood Law Office
Sierra Club
Webster Groves Nature Study Society**

January 18, 2005

Ms. Marcia Willhite
Bureau of Water
Illinois EPA

via fax (217) 782-5549, (217) 782-9891 and email

Re: NPDES IL0000329 U.S. Steel-- Request for Hearing/Extension
Re: NPDES Permit No. IL 0000329, Notice No. BMB:04090101.bah

Dear Ms. Willhite:

Our organizations request that the Agency hold a public hearing for the above-entitled permit. The receiving waters for this permit is Horseshoe Lake at Horseshoe Lake State Park in Madison County. The lake is used recreationally by outdoor enthusiasts, bird watchers, nature lovers, fishers, hunters and families. It is also used by low-income and minority folks for subsistence fishing.

Horseshoe Lake is impaired. Your notice indicates the pollutants are PCBs, pH, suspended solids, excessive algal growth, ammonia (unionized), nutrients, phosphorus, total ammonia-N. We have seen fish caught at Horseshoe Lake with melanoma. An IDNR fish biologist confirmed fish with melanoma at Horseshoe.

Prof. Richard Brugam and his students at Southern Illinois University at Edwardsville have done testing of the sediment at Horseshoe Lake, which has shown high concentrations of lead. Canteen Lake, which is part of the same lake, but privately owned, tested high in cadmium.

Granite City Steel in this permit would be allowed to put additional lead into the lake. It would be allowed to put additional ammonia into the lake. That appears to be contrary to the Clean Water Act and to the Bureau of Water's stated mission to ensure that Illinois' rivers, streams and lakes will support all uses for which they are designated including protection of aquatic life and recreation.

You list as potential contributors to the impairment of the lake: agriculture, crop-related sources, non-irrigated crop production, habitat modification, stream bank modification/destabilization. We believe industrial effluent from Granite City Steel should be added to the list.

In the latest U.S. EPA Enforcement & Compliance History Online (ECHO) report, U.S. Steel/National Steel/Granite City Steel (the facility is known by all three names, but has one NPDES ID) is listed as being out of compliance six quarters in the last three years, with one informal enforcement action and one formal enforcement action taken.

Page 2 Re: NPDES Permit No. IL 0000329, Notice No. BMB:04090101.bah

According to the EPA facility information site, pasted below, the facility has significantly violated its ammonia limits. Horseshoe Lake is impaired with ammonia. GC Steel has also violated other limits.

CWA/NPDES Compliance Status

Statute/Source	QTR1 Jul-Sep p01	QTR2 Oct-Dec ec01	QTR3 Jan-Mar ar02	QTR4 Apr-Jun n02	QTR5 Jul-Sep p02	QTR6 Oct-Dec ec02	QTR7 Jan-Mar 03	QTR8 Apr-Jun 03	QTR9 Jul-Sep 03	QTR10 Oct-Dec Dec03	QTR11 Jan-Mar Mar04	QTR12 Apr-Jun un04
Non-compliance in Quarter	No	No	Yes	No	No	No	Yes	Yes	Yes	Yes	Yes	No

SNC/RNC Status »»

E(Effluent) (Resol) R(Resolvd)

Effluent Violations by NPDES Parameter

Discharge point:001

<u>SOLIDS, TOTAL SUSPENDED</u>	<u>N</u> <u>Mt</u> <u>h</u>	<u>29%</u>		
<u>NITROGEN, AMMONIA TOTAL (AS N)</u>	<u>Mt</u> <u>hly</u>	<u>115%</u>	<u>10%</u>	
<u>CYANIDE, WEAK ACID, DISSOCIABLE</u>	<u>N</u> <u>Mt</u> <u>h</u>	<u>8%</u>	<u>23%</u>	<u>82%</u>
<u>IRON, TOTAL (AS FE)</u>	<u>Mt</u> <u>hly</u>		<u>25%</u>	

	<u>N</u>		<u>22%</u>	<u>130%</u>
	<u>Mt</u>			
	<u>h</u>			
<u>OIL AND GREASE</u>	<u>N</u>			<u>20%</u>
	<u>Mt</u>			
	<u>h</u>			
<u>BENZO(A)PYRENE</u>	<u>N</u>	<u>18%</u>		
	<u>Mt</u>			
	<u>h</u>			
<u>NAPHTHALENE</u>	<u>N</u>		<u>82%</u>	
	<u>Mt</u>			
	<u>h</u>			

Effluent Violations are displayed as highest percentage by which the permit limit was exceeded for the quarter. Bold, largeprint indicates Significant Non-compliance (SNC) effluent violations. Shaded boxes indicate unresolved SNC violations.

Page 3 Re. NPDES Permit No. IL 0000329, Notice No. BMB 04090101.bah

According to the EPA ECHO website, GC Steel is also in significant noncompliance with its Clean Air Act permit and RCRA permit.

We ask that you hold a public hearing in order to allow citizens to ask questions and present information and testimony. We have just recently received the SIUE reports and have not had time to review them or to get technical guidance as to their meaning.

If you deny this request for a hearing, we ask for a meeting with you and your staff, followed by a 30-day extension of the public comment period.

Thank you for your consideration of our request.

Kathy Andria
 American Bottom Conservancy
 614 N 7th St, East St. Louis
 (618) 875-9960

Kathleen Logan-Smith
 Health & Environmental Justice--St. Louis

Kathleen O'Keefe

Neighborhood Law Office, East St. Louis

Jack Norman
Sierra Club

Yvonne Homeyer
Webster Groves Nature Study Society

email copies sent to

marcia.willhite@epa.state.il.us, toby.frevert@epa.state.il.us, al.keller@epa.state.il.us,
bill.hammel@epa.state.il.us

Al Kelle

FROM : Neighborhood Law Office

PHONE NO. : 618 271 0835

JAN. 18 2005 06:34PM P1

**American Bottom Conservancy
Health & Environmental Justice—St. Louis
Neighborhood Law Office
Sierra Club
Webster Groves Nature Study Society**

January 18, 2005

Ms. Marcia Willhite
Bureau of Water
Illinois EPA

via fax (217) 782-5549; (217) 782-9891 and email

Re: NPDES IL0000329 U.S. Steel-- Request for Hearing/Extension

Re: NPDES Permit No. IL 0000329, Notice No. BMB:04090101.bah

Dear Ms. Willhite:

Our organizations request that the Agency hold a public hearing for the above-entitled permit. The receiving waters for this permit is Horseshoe Lake at Horseshoe Lake State Park in Madison County. The lake is used recreationally by outdoor enthusiasts, bird watchers, nature lovers, fishers, hunters and families. It is also used by low-income and minority folks for subsistence fishing.

Horseshoe Lake is impaired. Your notice indicates the pollutants are PCBs, pH, suspended solids, excessive algal growth, ammonia (unionized), nutrients, phosphorus, total ammonia-N. We have seen fish caught at Horseshoe Lake with melanoma. An IDNR fish biologist confirmed fish with melanoma at Horseshoe.

Prof. Richard Brugam and his students at Southern Illinois University at Edwardsville have done testing of the sediment at Horseshoe Lake, which has shown high concentrations of lead. Canteen Lake, which is part of the same lake, but privately owned, tested high in cadmium.

Granite City Steel in this permit would be allowed to put additional lead into the lake. It would be allowed to put additional ammonia into the lake. That appears to be contrary to the Clean Water Act and to the Bureau of Water's stated mission to ensure that Illinois' rivers, streams and lakes will support all uses for which they are designated including protection of aquatic life and recreation.

You list as potential contributors to the impairment of the lake: agriculture, crop-related sources, non-irrigated crop production, habitat modification, stream bank modification/destabilization. We believe industrial effluent from Granite City Steel should be added to the list.

In the latest U.S.EPA Enforcement & Compliance History Online (ECHO) report, U.S. Steel/National Steel/Granite City Steel (the facility is known by all three names, but has one NPDES ID) is listed as being out of compliance six quarters in the last three years, with one informal enforcement action and one formal enforcement action taken.

Page 2 Re: NPDES Permit No. IL 0000329, Notice No. BMB:04090101.bah

According to the EPA facility information site, pasted below, the facility has significantly violated its ammonia limits. Horseshoe Lake is impaired with ammonia. GC Steel has also violated other limits.

CWA/NPDES Compliance Status

Statute: Source ID	QTR1	QTR2	QTR3	QTR4	QTR5	QTR6	QTR7	QTR8	QTR9	QTR1	QTR1	QTR1
CWA IL0000329	Jul- Sep01	Oct- Dec01	Jan- Mar02	Apr- Jun02	Jul- Sep02	Oct- Dec02	Jan- Mar03	Apr- Jun03	Jul- Sep03	0 Dec03	1 Jan- Mar04	2 Apr- Jun04

Non-compliance in Quarter	No	No	Yes	No	No	No	Yes	Yes	Yes	Yes	Yes	No
---------------------------	----	----	-----	----	----	----	-----	-----	-----	-----	-----	----

SNC/RNC Status >>

E(Effvi
ol) R(Res
olvd)

Effluent Violations by NPDES Parameter:

Discharge point:001

<u>SOLIDS, TOTAL SUSPENDED</u>	<u>N Mt h</u>												<u>29%</u>	
<u>NITROGEN, AMMONIA TOTAL (AS N)</u>	<u>Mt hly</u>												<u>115%</u>	<u>10%</u>
<u>CYANIDE, WEAK ACID, DISSOCIABLE</u>	<u>N Mt h</u>												<u>195%</u>	<u>23%</u> <u>82%</u>
<u>IRON, TOTAL (AS FE)</u>	<u>Mt hly</u>												<u>22%</u>	<u>25%</u> <u>130%</u>
<u>OIL AND GREASE</u>	<u>N Mt h</u>													<u>20%</u>
<u>BENZO(A)PYRENE</u>	<u>N Mt h</u>												<u>18%</u>	
<u>NAPHTHALENE</u>	<u>N Mt h</u>													<u>82%</u>

Effluent Violations are displayed as highest percentage by which the permit limit was exceeded for the quarter. Bold, large print indicates Significant Non-compliance (SNC) effluent violations. Shaded boxes indicate unresolved SNC violations.

Page 3 Re: NPDES Permit No. IL 0000329, Notice No. BMB:04090101.bah

According to the EPA ECHO website, GC Steel is also in significant noncompliance with its Clean Air Act permit and RCRA permit.

We ask that you hold a public hearing in order to allow citizens to ask questions and present information and testimony. We have just recently received the SIUE reports and have not had time to review them or to get technical guidance as to their meaning.

If you deny this request for a hearing, we ask for a meeting with you and your staff, followed by a 30-day extension of the public comment period.

Thank you for your consideration of our request.

Kathy Andria
American Bottom Conservancy
614 N. 7th St., East St. Louis 602261
(618) 875-9960

Kathleen Logan-Smith
Health & Environmental Justice—St. Louis

Kathleen O'Keefe
Neighborhood Law Office, East St. Louis

Jack Norman
Sierra Club

Yvonne Homeyer
Webster Groves Nature Study Society

email copies sent to

marcia.willhite@epa.state.il.us, toby.frevert@epa.state.il.us, al.keller@epa.state.il.us,
bill.hammel@epa.state.il.us

State of Illinois
Environmental Protection Agency

Subject: US Steel-Granite City Works
Data: IL0000329
Reviewed By: Beth M. Burkard

Page 1 of 1

Date: 1/24/2005

The Agency issued to National Steel Corp.-Granite City Works, now United States Steel-Granite City Works, NPDES Permit No. IL0000329 on May 11, 1998, with expiration on April 30, 2003. US Steel submitted renewal applications in a timely fashion. The current permit allows the discharge of Treated Process Wastewater at Outfall 001, with Internal Outfalls A01 (Coke Byproducts WW) and B01 (Cold Rolling Mill WW) tributary to Outfall 001. Granite City Works (GCW) is an integrated steel mill, with discharge through a plume to Horseshoe Lake.

The changes to the existing permit in the proposed reissued permit are:

- US Steel purchased most of plant from National Steel Corp.-Name Change
- Landfills III and IV are still owned by National Steel; these are designated as containing hazardous waste; US Steel has requested the creation of an internal outfall for the leachate from these two landfills; the leachate is treated in the WWTP-Create Internal Outfall C01
- Sintering and Sulfuric Acid Pickling are no longer used at the facility
- Facility production has changed, yielding higher production-based load limits for Lead, Zinc for Outfall 001; and Tetrachloroethylene and Naphthalene at B01
- Load limit for Benzo(a)Pyrene at Internal Outfall A01 (Coke Byproducts WW) has increased from 0.11 lb/day in current permit to 0.15 lb/day in proposed permit; BaP limits are based on actual plant discharges, per Central Treatment Exemption

The Agency received comments from US Steel; Health and Environmental Justice of East St. Louis; and a group letter from several public interest groups. US Steel specified that they did not require a Public Hearing. The other two letters requested a Public Hearing.

The Agency received a letter from Ms. Kathleen Logan Smith on behalf of Heath and Environmental Justice of East St. Louis via email on January 17, 2005. Ms. Logan Smith requests that the Agency hold a Public Hearing. Ms. Logan Smith's concern is the bioaccumulation of lead and other heavy metals that may adversely affect the fish population, and the public who consume the fish and waterfowl.

The group letter from American Bottom Conservancy, Heath & Environmental Justice of St. Louis, Neighborhood Law Office, Sierra Club, and Webster Groves Nature Study Society, hereafter referred to as Group Letter, expresses concern regarding the impact of GCW's discharge on Horseshoe Lake. The major concern is that Horseshoe Lake is impaired, which has a negative impact on the community that utilizes the Lake for recreation and for a food source. The comment specifically relating to the permit reissuance is the increase in load limits for lead and ammonia. Regarding Lead, the load limits included in the updated permit are production-based. It is not considered backsliding if limits increase because of increased production or facility alternation. Regarding Ammonia-N, the new limits are based upon water quality standards. The Planning Department's updated method for calculating water quality-based Ammonia-N standards does not constitute backsliding even if the new limits are less stringent than previous limits. The other comments address GCW's noncompliance with its NPDES permit, CAA Permit, and RCRA permit. GCW has had 6 quarters with non-compliance, (one

State of Illinois
Environmental Protection Agency

Subject: US Steel-Granite City Works

Page 2 of 1

Data: IL0000329

Reviewed By: Beth M. Burkard

Date: 1/24/2005

quarter of Significant Non-compliance (SNC)) for NPDES permit in past 3 years.

IEPA EXHIBIT

No. 67

From: Blaine Kinsley
To: Burkard, Beth
Date: 1/24/2005 11:40:30 AM
Subject: Re: US Steel-GCW Summary of Hearing Requests

Thanks Beth,

All that was necessary was the comment summary of Environmentalist concerns. Did Bob Mosher's memo address anti-degradation?

>>> Beth Burkard 01/24/05 11:33 AM >>>
Blaine:

As requested, here is my summary of the responses we received. In the summary, I didn't mention what comments US Steel made. They were technical things like sample types and whether 301(g) variance applied to Ammonia, nothing to do with a hearing request. They specifically said they didn't need a public hearing.

Thanks. -beth m burkard

IEPA EXHIBIT

No. 68

From: Blaine Kinsley
To: Burkard, Beth
Date: 1/24/2005 11:46:18 AM
Subject: Re: US Steel-GCW Summary of Hearing Requests

I'll touch base with Bob.

>>> Beth Burkard 01/24/05 11:43 AM >>>
Blaine:

None of the Planning memos address antidegradation for this reissuance, only reasonable potential and water quality limits, and 303(d)/BSC evaluation.

-beth m burkard

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCYNo. 69Subject: US Steel-Granite City Works
Data: IL0000329
Reviewed By: Beth M. Burkard

Page 1 of 4

Date: 01/22/01/31/2005

30-Day Public Notice Review Notes:

The Agency received comments from several parties during the Public Notice period. The comments are from Mr. Merle Stein of US Steel, General Manager of Granite City Works; Ms. Kathleen Logan Smith of Heath and Environmental Justice of St. Louis; and a group comment from Ms. Kathy Andria of American Bottom Conservancy, Ms. Kathleen Logan Smith of Health and Environmental Justice of St. Louis, Ms. Kathleen O'Keefe of Neighborhood Law Office of East St. Louis, Mr. Jack Norman of Sierra Club, and Ms. Yvonne Homeyer of Webster Grove Nature Study Society.

The Agency received from Mr. Stein of US Steel a letter on January 13, 2005, indicating three concerns as follows.

1. "GCW continues to believe the 301(g) variance for ammonia is applicable to outfall 001. We are requesting to preserve the 301(g) variance for ammonia through the special condition provided in the previous permit. The 301(g) variances for ammonia and phenol in the permit stated: "Special Condition 9. For purposes of this permit, load limits for ammonia (as N) and Phenol (4AAP) have been based on actual plant discharges and are included in accordance with a 301(g) variance approved by the USEPA. Any changes to these load limits can only be made following Public Notice and opportunity for hearing." We believe this language is appropriate since the load limits are based on water quality limitations as in the original 301(g) based permit and the previous permit. The load limits in the previous permit were adjusted from the original 301(g) variance based on new water quality limitations, and the above Special Condition 9 was included in the permit. Likewise, the existing load limits for ammonia are being adjusted from the previous permit limitations based once again on new water quality limitations, and we believe the Special Condition should continue to include ammonia as part of the 301(g) variance in the new permit."

Response: 301(g) is a section of the Clean Water Act that allows for the issuance of a variance. The variance provides relief from BAT standards, but requires limits to be protective of water quality. This variance has been applied, in that BAT limits are not included in the permit and protection of water quality is maintained by including water quality-based limits. The 301(g) variance issued specifically to GCW specifies an Ammonia-N loading limits, or proposed modified effluent limitations (PMELs), as follows:

	Monthly Average	Daily Maximum
April-October	500	900
November-March	600	900

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

Subject: US Steel-Granite City Works

Page 2 of 4

Data: IL0000329

Reviewed By: Beth M. Burkard

Date: 01/22/01/31/2005

The PMELs included in the 301(g) variance as issued to GCW "are reflective of the effluent loadings presently being reported and will meet applicable Illinois water quality standards at the outfall". One drawback to using these PMELs is that the water quality standards are no longer evaluated as April-October and November-March. The draft reissued permit does require maintenance of water quality standards, but the limits in the draft permit are not the PMELs established by the 301(g) variance. Thus, the 301(g) variance did determine the limits for Ammonia-N in the permit, in that relief from BAT is included in the draft reissued permit, but the load limits are not based upon actual plant loading.

GCW's concern is the wording of Special Condition 5 (Special Condition 9 in the previous permit). Special Condition 5 currently reads that the load limits for Phenol were determined by actual plant discharges, in accordance with the 301(g) variance. GCW would like Special Condition 5 to say that load limits for Phenol and Ammonia (as N) are both determined by actual plant discharges, etc. The load limits for Ammonia (as N) are determined by water quality standards, not actual plant discharges. Thus it would be inaccurate to say that load limits for Ammonia (as N) are determined by actual plant discharges. Because it is important to GCW for the permit to specify that load limits for Ammonia (as N) are dictated by the 301(g) variance, the permit writer will add a line to Special Condition 5 of the draft reissued permit to state that Phenol load limits are based upon actual plant discharges, but that Ammonia (as N) load limits are based upon water quality standards.

Action: Change the special condition to indicate that the 301(g) variance has been applied for Ammonia-N discharge, but indicate that only the load limits for phenol are based upon actual facility discharges.

2. "We are requesting an option for the mathematical composite, which allows the laboratory to composite the individual grab samples versus analyzing separately. The laboratory adds preservatives to the sample collection bottles prior to collecting the grab samples for total and available cyanides. Therefore, the individual grab samples will be preserved at the time of collection and prior to compositing in the laboratory. GCW is proposing a series of 3 grab samples over any 24-hour period for the composite. This option should give the sample analytical results as the mathematical composite but at a lower laboratory cost."

Response: The permit writer's intention in initially requiring a grab sample for the cyanides was that the method found in 40 CFR 136 requires that analyses for cyanide compounds be performed within 24 hours, and that the sample must be in a sealed, light-protected container, under refrigeration. It is difficult to obtain a composite sample while maintaining each of these requirements. After the

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

Subject: US Steel-Granite City Works
Data: IL0000329
Reviewed By: Beth M. Burkard

Page 3 of 4

Date: 01/22/01/31/2005

primary notice period, GCW requested a composite sample so that the representative changes throughout a 24-hour period could be included in the analysis. A mathematical composite provides protection of the integrity of each sample, as well as a value demonstrating a day's discharge. The concern with changing to a this type of sample is that the first portion collected for the composite sample may be held for over 24 hours. Per 40 CFR 136, if Sulfide is present in the wastewater (Sulfide is present in outfall 001, per application 2C), maximum holding time is 24 hours. If the first portion is collected at 0500, the second at 1200, and the third at 1900, and the lab analyzes the sample the next day, the portion collected at 0500 is over 24 hours old. If the permittee is able to sample the discharge within 24 hours of the initial collection, and the method outlined in 40 CFR 136 for the appropriate storage and preparation is followed, this will be an acceptable method of analyzing the discharge for Cyanide, Total, and Cyanide by OIA-1677.

Action: Require that GCW analyze the sample less than 24 hours from the initial sample collection, and use methods consistent with 40 CFR 136.

3. "We agree with IEPA's interpretation of the applicability of the central treatment exemption to GGCW and the continued use of the 301(g) exemptions. Also, the consideration of the attenuation of ammonia near the outfall is consistent with the previously issued NPDES permit."

Response: Agreed. No action necessary.

The group letter from American Bottom Conservancy, Heath & Environmental Justice of St. Louis, Neighborhood Law Office, Sierra Club, and Webster Groves Nature Study Society, hereafter referred to as Group Letter, expresses concern regarding the impact of GCW's discharge on Horseshoe Lake. The major concern is that Horseshoe Lake is impaired, which has a negative impact on the community that utilizes the Lake for recreation and for a food source. The comment specifically relating to the permit reissuance is the increase in load limits for lead and ammonia. The other comments address GCW's noncompliance history with its NPDES permit, Clean Air Act Permit, and RCRA permit. The permit writer is not qualified to address any issues regarding Clean Air Act or RCRA permits.

1. "Granite City Steel in this permit would be allowed to put additional lead into the lake. It would be allowed to put additional ammonia into the lake. That appears to be contrary to the Clean Water Act and to the Bureau of Water's stated mission to ensure that Illinois' rivers, streams and lakes will support all uses for which they are designated including protection of aquatic life and recreation."

Response: The existing and proposed load and concentration limits are as follows.

STATE OF ILLINOIS
 ENVIRONMENTAL PROTECTION AGENCY

Subject: US Steel-Granite City Works
 Data: IL0000329
 Reviewed By: Beth M. Burkard

Page 4 of 4

Date: 01/22/01/31/2005

	Current Permit Limits				Proposed Permit Limits			
	Load Limit		Concentration Limit		Load Limit		Concentration Limit	
	30-D Avg.	Daily Max.	30-D Avg.	Daily Max.	30-D Avg.	Daily Max.	30-D Avg.	Daily Max.
Lead	5.28	15.8		0.1	5.6	17	0.09	0.4
Ammonia-N:								
Summer	313	2,752	1.5	13.2	459	3128	2.2	15
Winter	834	1,772	4.0	8.5	1501	3128	7.2	15
Spring/Fall					584	3128	2.8	15
March					834	3128	4.0	15

Regarding Lead, the load limits included in the updated permit are production-based. It is not considered backsliding if limits increase because of increased production, as is outlined in 40 CFR 122.44(l)(2)(i).

Regarding Ammonia-N, the new limits are based upon water quality standards. At the time of previous issuance, the Planning Department provided water quality standards for Ammonia-N in April-October (Summer) and November-March (Winter). The current and proposed limits for Ammonia-N are water quality-based, and depend upon temperature and pH of the receiving waters. The increase in limits does not constitute backsliding.

Action: Draft letter to Group, explaining the increased load limits for Lead and Ammonia-N. Possible Public Meeting or Hearing.

The Agency received a letter from Ms. Kathleen Logan Smith on behalf of Heath and Environmental Justice of East St. Louis via email on January 17, 2005. Ms. Logan Smith requests that the Agency hold a Public Hearing. Ms. Logan Smith's concern is the bioaccumulation of lead and other heavy metals that may adversely affect the fish population, and the public who consume the fish and waterfowl.

Response: The limits included in the draft permit for Lead and Zinc are based upon the production-based categorical limits provided in 40 CFR 420.

Action: Draft a letter to Health and Environmental Justice of East St. Louis clarifying the increase in load limits for Lead.

Action: Submit a summary of above information to Bureau of Water Management for review. If Public Hearing or Public Meeting is necessary, issue appropriate notices. If no meetings are necessary, send responses to all interested parties, explaining Agency rationale and thanking them for their participation.

BMB
01-31-2005



United States Steel Corporation
600 Grant Street
Pittsburgh, PA 15219-2800
412 433 5914
Fax: 412 433 5920
email: dpboyeajr@uss.com

Douglas P. Boyea, Jr.
Manager
Regulatory Compliance, Water
Environmental Affairs

RECEIVED
APR 24 2005

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY
BOW/WPC/PERMIT SECTION

VIA FEDERAL EXPRESS
(ADVANCE COPY VIA FAX)

25 April 2005

Mr. Blaine Kinsley
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

**Re: NPDES Permit No. IL0000329
United States Steel Granite City Works
Response to Various Environmental Advocacy Groups Comments**

Dear Mr. Kinsley

Accompanying this letter are United States Steel's (USS) responses to comments submitted to Illinois Environmental Protection Agency (IEPA) by various environmental advocacy organizations (Health & Environmental Justice - St. Louis, American Bottom Conservancy, Neighborhood Law Office, Sierra Club and Webster Groves Nature Study Society) regarding the renewal of United States Steel (USS) Granite City Works' NPDES Permit (No. IL0000329). Their comments were submitted as part of their request for a public hearing on the permit.

USS believes the comments submitted to IEPA are largely irrelevant to the permit, and are adequately addressed in this correspondence. Therefore, a public hearing is unjustified and further delay in the reissuance of permit IL0000329 is unwarranted. USS requests IEPA reissue NPDES Permit IN0000329 immediately.

Sincerely,

Douglas P. Boyea, Jr.

- cc J. D. Moniot
- C. Cannon
- L. Siebenberger
- D. Baker

The following are the comments submitted by Health & Environmental Justice - St. Louis with responses from United States Steel. All text written by U. S. Steel is in italics.

Please hold a public hearing on the US Steel Corp. NPDES permit referenced above and extend the comment period for three weeks on the above referenced permit. This permit warrants public involvement because it impacts directly a recreational body of water promoted by the Illinois Department of Natural Resources for boating, fishing, bird watching, and waterfowl hunting.

This permit would allow additional discharges of toxic heavy metals known to accumulate in biological organisms. Over three, five or ten years, the quantity of lead, a persistent, bioaccumulative toxin, discharged into the Lake, would add up to hundreds of pounds and may have a serious detrimental effect on organisms living in the lake.

United Steel Response: *This is not a new permit, but rather a renewal of an existing NPDES permit that has been held by this facility since NPDES permits were required. The reissuance of this permit will not degrade the quality of water in Horseshoe Lake or have an adverse effect on the aquatic fauna, aquatic flora or surrounding wildlife habitat. The limits for lead comply with USEPA Effluent Limit Guidelines (ELG) and Best Available Technology (BAT) controls. Lead discharges are regulated on the Federal level under 40 CFR 420 and on the Illinois State level under 35 IAC 302. This permit complies with both criteria. The facility has no history of lead discharge exceedences.*

The IDNR website proclaims Horseshoe Lake's (Madison County) fishing opportunities, "The lake contains channel catfish, bass, crappie, bluegill, carp, and buffalo." The lake is favored spot for fishing, often for individuals who rely on fish caught as protein sources. These individuals, who are often low income and minority individuals, are already exposed to excessive levels of PCB's from fish consumption. At least two species of fish, channel catfish and carp, carry consumption advisories. This permit would add several other toxins to their body burden. Hunters who consume waterfowl from Horseshoe Lake could also be potentially exposed.

United States Steel Response: *The fish advisories mentioned are for PCB content only. There are no consumption advisories for fish in Horseshoe Lake for any contaminant other than PCBs. U. S. Steel does not use, generate or discharge PCBs to Horseshoe Lake. PCBs are not part of the permit, nor have they ever been. PCBs are present on the site in detectable amounts in some electrical equipment such as fluorescent lighting ballasts, but PCB transformers and other such equipment were removed from the site a number of years ago. Evaluation of PCBs was a required part of the permit application process. If there were concerns for any other constituents affecting fish in Horseshoe Lake, these would have been included in the Illinois Department of Natural Resources' (IDNR) advisory.*

A public hearing would give citizens an opportunity to ask questions about the permit, voice concerns, and hear explanations.

The following are the comments submitted by American Bottom Conservancy, Health & Environmental Justice – St. Louis, Neighborhood Law Office, Sierra Club and Webster Groves Nature Study Society with responses from United States Steel. All text written by U. S. Steel is in italics.

Our organizations request that the Agency hold a public hearing for the above-entitled permit. The receiving waters for this permit is Horseshoe Lake at Horseshoe Lake State Park in Madison County. The lake is used recreationally by outdoor enthusiasts, bird watchers, nature lovers, fishers, hunters and families. It is also used by low-income and minority folks for subsistence fishing.

Horseshoe Lake is impaired. Your notice indicates the pollutants are PCBs, pH, suspended solids, excessive algal growth, ammonia (unionized), nutrients, phosphorus, total ammonia-N. We have seen fish caught at Horseshoe Lake with melanoma. An IDNR fish biologist confirmed fish with melanoma at Horseshoe.

United States Steel Response:

The information presented in the paragraph above is posted on the Illinois Environmental Protection Agency (IEPA) website. Horseshoe Lake is classified as Moderately Impaired. This assessment is based on chemical/physical data collected within the previous five years as part of an Ambient Lake Monitoring Program, and upon fish-tissue analysis. IEPA's study concluded the factors contributing to the impaired status of Horseshoe Lake were agriculture, crop-related sources, non-irrigated crop production, habitat modification and stream bank modification/destabilization. The fish-tissue study resulted in an advisory by the Illinois Department of Health for two species, (Channel Catfish and Carp) due to PCBs in their tissue. As previously stated, PCBs are not used at the U. S. Steel Granite City Facility or discharged into Horseshoe Lake from the facility. The list of pollutants in the above paragraph is also from the IEPA website and it is important to note that the only parameter listed as being present with a high confidence level is PCB. A "no confidence level" is assigned to all of the other parameters. The statement, "We have seen fish caught at Horseshoe Lake with melanoma," is anecdotal, undocumented and therefore irrelevant.

Prof. Richard Brugam and his students at Southern Illinois University at Edwardsville have done testing of the sediment at Horseshoe Lake, which has shown high concentrations of lead. Canteen Lake, which is part of the same lake, but privately owned, tested high in cadmium.

United States Steel Response:

The study performed by Professor Brugam may show elevated concentrations of lead in the Horseshoe Lake sediments, but this comment fails to mention what Professor Brugam considered elevated, what comparative baseline determined the elevated concentration, the source of the lead or the specific sample collection locations. The quality control and quality assurance (QA/QC) methods governing the study are unknown. There is no reference to Canteen Lake in the IEPA list of impaired waters. Additionally, any cadmium concentration is irrelevant as cadmium is not a constituent in U. S. Steel's effluent and is not part of the permit.

Granite City Steel in this permit would be allowed to put additional lead into the lake. It would be allowed to put additional ammonia into the lake. That appears to be contrary to the Clean Water Act and to the Bureau of Water's stated mission to ensure that Illinois' rivers, streams and lakes will support all uses for which they are designated including protection of aquatic life and recreation.

United States Steel Response: *Lead is discussed in the first comment response on page 2. Ammonia (Nitrogen) is regulated by Illinois under 35 LAC 355. It should also be noted that lead is not listed by the IEPA as a contributing factor to the impaired designation of Horseshoe Lake.*

You list as potential contributors to the impairment of the lake: agriculture, crop-related sources, non-irrigated crop production, habitat modification, stream bank modification/destabilization. We believe industrial effluent from Granite City Steel should be added to the list.

United States Steel Response: *This information is posted on from the IEPA website. It should also be noted that these sources of impairment are determined from data collected during the past five years. All are nonpoint sources and specifically listed as such. United States Steel's Granite City facility is not considered a source of the impairment based on the assessment of these scientific data. The commenters present no alternate scientific evidence to include the U. S. Steel facility as a source of the impaired designation.*

In the latest U.S.EPA Enforcement & Compliance History Online (ECHO) report, U.S. Steel/National Steel/Granite City Steel (the facility is known by all three names, but has one NPDES ID) is listed as being out of compliance six quarters in the last three years, with one informal enforcement action and one formal enforcement action taken.

United States Steel Response: *The U. S. EPA ECHO reports compiles data quarterly. This is grossly misleading, as a one sample spike in an effluent parameter will be reported as a quarterly incident. A comparison of the information submitted by the commenters with the actual data reported on the NPDES Discharge Monitoring reports (DMR) show that the alleged noncompliance events with the exception of Total Ammonia-N during the first quarter 2003 were primarily one-sample events in that quarter that did not result in a monthly loading exceedence.*

Benzo(a)Pyrene exceeded the daily concentration limit twice in January 2003 with no exceedence of the daily or monthly loading limit.

Weak acid dissociable (WAD) Cyanide exceeded daily limits twice in January and February 2003 and once in March 2003. There were no monthly loading exceedences.

Exceedences for Total Iron and Total Suspended Solids (TSS) were both one-sample events with no monthly load exceedence. The monthly Ammonia exceedence that occurred in the first quarter of 2003 was due to an upset condition at the end of January, recurred in February and was corrected in

March 2003. This condition resulted in monthly average loading exceedences for those months.

The non-compliance event for monthly Ammonia listed for the first quarter of 2004 is a minor exceedence in the 30-day average concentration that did not translate into a loading exceedence. All the other noncompliance indications are one-sample events. Therefore, with the exception of the Ammonia-N incident, the U. S. Steel Granite City facility exceeded one or more discharge parameter limits only five single times in three years.

The Iron exceedence in the first quarter 2004 was a one-sample event that resulted in a monthly average load exceedence for February.

The Oil and Grease exceedence occurring in the first quarter 2004 was a one-sample event resulting in no load exceedence.

Naphthalene and WAD Cyanide exceeded concentration limits for one sampling event in October and December respectively. Neither resulted in a loading exceedence.

According to the EPA ECHO website, GC Steel is also in significant noncompliance with its Clean Air Act permit and RCRA permit.

United States Steel Response: *These are air exceedences and are irrelevant to the NPDES Permit renewal.*

We ask that you hold a public hearing in order to allow citizens to ask questions and present information and testimony. We have just recently received the SIUE reports and have not had time to review them or to get technical guidance as to their meaning.

United States Steel Response: *Presumably, the reports referenced above consist of the study performed by Professor Brugam of Southern University of Illinois at Edwardsville. The subject of this study according to the commenters is lead and cadmium concentrations in the Horseshoe Lake sediments. As previously stated, Horseshoe Lake is not impaired from lead and cadmium. Review the comment response above pertaining to this study.*

If you deny this request for a hearing, we ask for a meeting with you and your staff, followed by a 30-day extension of the public comment period.

Thank you for your consideration of our request.

*

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCYNo. 74Subject: US Steel-Granite City Works
Data: IL0000329

Page 1 of 1

Reviewed By: Beth M. Burkard

Date: 01/24, 05/20/2005

The Agency issued to National Steel Corp.-Granite City Works, now United States Steel-Granite City Works, NPDES Permit No. IL0000329 on May 11, 1998, with expiration on April 30, 2003. US Steel submitted renewal applications in a timely fashion. The current permit allows the discharge of Treated Process Wastewater at Outfall 001, with Internal Outfalls A01 (Coke Byproducts WW) and B01 (Cold Rolling Mill WW) tributary to Outfall 001. Granite City Works (GCW) is an integrated steel mill, with discharge through a flume to Horseshoe Lake.

The changes to the existing permit in the proposed reissued permit are:

- US Steel purchased most of plant from National Steel Corp.-Name Change
- Landfills III and IV are still owned by National Steel; these are designated as containing hazardous waste; US Steel has requested the creation of an internal outfall for the leachate from these two landfills; the leachate is treated in the WWTP-Create Internal Outfall C01
- Sintering and Sulfuric Acid Pickling are no longer used at the facility
- Increase in production yielded an increase in production-based load limits for Lead, Zinc for Outfall 001; and Tetrachloroethylene and Naphthalene at B01
- Load limit for Benzo(a)Pyrene at Internal Outfall A01 has increased from 0.11 to 0.15 lb/day in proposed permit; BaP limits are based on actual discharges, per Central Treatment Exemption

The Agency received comments from US Steel; Health and Environmental Justice of East St. Louis; and a group letter from several public interest groups. US Steel specified that they did not require a Public Hearing. The other two letters requested a Public Hearing.

Following are the comments in the letters:

- Bioaccumulation of Lead and heavy metals in fish (people consume the fish)
- Increase of Lead and Ammonia load limits
 - Response: Lead: Increased Lead load limit is due to production changes, and load limit is consistent with ELGs established at 40 CFR 420; Ammonia: The new Ammonia-N limits are based upon the pH and temperature in Horseshoe Lake
- Horseshoe Lake is impaired per 303(d) list
 - Response: Horseshoe Lake has been evaluated as a Medium Priority, impaired for PCBs (not generated at US Steel), SS, Algae, Ammonia (Unionized), Nutrients, Phosphorus, and Total Ammonia-N; Horseshoe Lake is not impaired for Lead or heavy metals; Industrial Point Sources is *not* a source of impairment
- US Steel-GCW has been non-compliant with NPDES, CAA, and RCRA permits.
 - Response: USEPA has issued one NOV and one Formal Enforcement Action to GCW

The permit writer, the Industrial Unit Manager, and three US Steel representatives met at Sangamo Complex on May 13, 2005, to discuss the Public Hearing issue. The group discussed the option of retaining the Lead load limits from the previous reissued permit, but this is not desirable to US Steel. The facility does not use Lead, and the increased load limits are due to increased production. The US Steel employees noted that Horseshoe Lake is currently and has historically been a hunting ground, and lead shot may be contaminating the lake. US Steel cited an Ames Test that found the effluent to not be mutagenic, and cited the Fluoride discharge as a benefit to the lake, per the US Dept. of Conservation.

State of Illinois
Environmental Protection AgencyNo. 75Subject: US Steel-Granite City Works
Data: IL0000329
Reviewed By: Beth M. Burkard

Page 1 of 4

Date: 05/13-05/20/2005

The Agency received a letter addressed to the Industrial Unit Manager dated April 25, 2005, from Mr. Douglas P. Boyea, Jr., Manager of Regulatory Compliance, Water, Environmental Affairs. The letter includes an attachment in which US Steel responds to the comments made in the letters the Agency received from the environmental groups following Public Notice. The letter indicates that US Steel feels the comments are not relevant to the NPDES permit reissuance, and that there is not justification for a Public Hearing. Per the letter, "US Steel requests reissuance of NPDES Permit No. IL0000329 immediately."

The attachment to the letter includes a segment of text from the comment letters, followed by US Steel's response to the comments in the segment of text. Following is a summary of those comments.

Regarding Health and Environmental Justice-East St. Louis Letter:

- Comment Letter: Requests a Public Hearing, and extension of comment period. Group has interest because receiving water is a recreational lake promoted by IDNR. Permit allows discharge of bioaccumulative heavy metals, especially Lead. Discharge of metals may have detrimental effects of lake organisms eventually.
- US Steel: Reissuance of existing NPDES permit. Permit protects water quality, will not adversely affect lake flora, fauna, and surrounding wildlife. Lead load limit is based on ELG for BAT, per 40 CFR 420, and 35 IAC 302.
- Response: Acceptable.
- Comment Letter: The IDNR promotes fishing in Horseshoe Lake. Many low-income residents rely on fish from Horseshoe Lake for sustenance. Channel catfish and carp have Fish Consumption Advisories. The permit will allow discharge of additional bioaccumulative compounds. Also, hunters may consume waterfowl from the lake and be exposed.
- US Steel: The fish advisories are for PCBs only. US Steel is not a source of PCBs.
- Response: Acceptable.

Regarding Group Letter:

- Comment Letter: Requests Public Hearing. Lake is used for recreation, as part of Horseshoe Lake State Park in Madison County. Also used for sustenance in low-income and minority citizens. The lake is 303(d) listed with sources of impairment as PCBs, pH, Suspended Solids, Excessive Algal Growth, Ammonia (Unionized), Nutrients, Phosphorus, and Total Ammonia-N. Group has witnessed fish caught in Horseshoe Lake to have melanoma, as confirmed by an IDNR fish biologist.
- US Steel: The 303(d) listing is as Moderately Impaired, with sources of agriculture, crop-related sources, non-irrigated crop production, habitat modification, and stream bank modification/destabilization. The IL Dept. of Health issued the Fish Consumption Advisories for Channel Catfish and Carp because of PCBs found in those species' fish tissue in fish from Horseshoe Lake. US Steel is not a source of PCBs. Of the 303(d) sources of

State of Illinois
Environmental Protection Agency

Subject: US Steel-Granite City Works
Data: IL0000329
Reviewed By: Beth M. Burkard

Page 2 of 4

Date: 05/13-05/20/2005

- impairment, PCBs is the only parameter with a high confidence level, with all other parameters listed as "no confidence level". US Steel feels the fish with melanoma statement to be anecdotal.
- Response: The 303(d) list does not specify Industrial Point Sources as a source of the impairment. More information is needed on the fish with melanoma issue-was this reported as part of an IDNR study, or did one fish appear with melanoma, and was confirmed by an IDNR fish biologist?
 - Comment Letter: A professor at SIU-E performed a study on sediment of Horseshoe Lake, demonstrating high Lead concentration. The sediment from Canteen Lake (part of Horseshoe Lake, but privately owned) was high in Cadmium.
 - US Steel: The comment provides insufficient information-what constituted elevated Lead, what was the comparison, what was the source of Lead, where were the samples collected, what was the QA/QC of the study. Canteen Lake is not 303(d) listed by IEPA. Cadmium is not a pollutant generated by US Steel and is not limited by the permit.
 - Response: A copy of the SIU-E study would be beneficial to determine its relevance in this matter. The application Form 2C, Part V, of October 17, 2002, indicates a concentration of <0.002 mg/L as the maximum daily Cadmium concentration. Cadmium is not a parameter of concern.
 - Comment Letter: Additional loading of Lead and Ammonia to the lake. Appears contrary to CWA and BOW Mission Statement.
 - US Steel: See above comment. Ammonia limit is based on water quality criteria at 35 IAC 355. Lead is not listed in 303(d) as an impairment in the lake.
 - Response: The increased loading of Lead is based upon the ELGs at 40 CFR 420, which are based upon production. As production increases at the facility, the amount of Lead they are authorized to discharge increases proportionally. The ELGs were developed with consideration of Best Available Technology, and are based upon the best-designed, well-operated plants available. The discharge must still meet the concentration limits.
 - Comment Letter: Lists the 303(d) sources of impairment. Group believes that GCW's effluent should be added to the list of sources.
 - US Steel: Based on the IEPA five year Ambient Lake Monitoring Program studies, the IEPA did not find that USS-GCW effluent was a source of impairment. Commentors present no scientific evidence for the inclusion of the effluent as a source of impairment.
 - Response: Agreed. The IEPA study did not show that the effluent from the facility was a contributing source of impairment to Horseshoe Lake.
 - Comment Letter: USEPA ECHO reports GCW has been non-compliant with the permit in six quarters of the past three years. One informal compliance action, and one formal compliance action were taken.

State of Illinois
Environmental Protection Agency

Subject: US Steel-Granite City Works
Data: IL0000329
Reviewed By: Beth M. Burkard

Page 3 of 4

Date: 05/13-05/20/2005

- US Steel: The ECHO reports are misleading due to the quarterly reporting-a violation of permit limits for one parameter appears as a violation for the quarter. All but one of those events were single parameter violations in each quarter. Many of the violations were concentration limit violations in which the loadings were below permit loading limits. One quarter of noncompliance involved a treatment plant upset that caused Ammonia-N exceedences.
- Response: The IEPA and USEPA have monitored the compliance and have take appropriate actions in response to permit exceedences.
- Comment Letter: Per USEPA ECHO, USS-GCW is in non-compliance with the Clean Air Act and RCRA permits.
- US Steel: Not relevant to NPDES permit.
- Response: Agreed-not relevant.
- Comment Letter: Requests Public Hearing. Group has not reviewed the aforementioned study thoroughly.
- US Steel: Assuming the study referred to is Professor Brugam's study with SIU-E students, the study is not relevant to the permitted discharge, as the study is regarding Lead and Cadmium in sediments (per the commentors).
- Response: Agency management will evaluate the requests and determine whether the Agency will initiate a Public Hearing. The commentors did not provide a copy of the study, and thus it is not possible to know the nature of the study. The following is an Abstract for Prof. Brugam's study.

**Brugam, Richard, Indu Bala, Jennifer Martin, Brian Vermillion, and
William Retzlaff**

**The Sedimentary Record of Environmental Contamination in Horseshoe
Lake, Madison County, Illinois**

Industrial development over the last 110 years has contaminated many parts of the American Bottoms, an extensive floodplain of the Mississippi River just east of St. Louis, MO. Water resources in this region have been severely impacted by long-term mismanagement of hazardous waste disposal by local industries. Toxic refuse from metal smelting, steel making, and wood-treatment industries has been released on site to percolate into the ground or to run off into local streams (Colten 1988). A record of metal contamination exists in the sediment of Horseshoe Lake, a natural oxbow lake in the most industrialized portion of the American Bottoms. We examined two dated sediment cores from Horseshoe Lake to reconstruct the historical record of environmental contamination. We used isotopes of nitrogen to track the history of sewage contamination finding that sediment $d^{15}N$ increased to values > 10 o/oo in the 1920's. Because such high values of $d^{15}N$ are only associated with the presence of human or animal wastes, we deduce that major contamination of the lake by sewage began at that time.

State of Illinois
Environmental Protection Agency

Subject: US Steel-Granite City Works
Data: IL0000329
Reviewed By: Beth M. Burkard

Page 4 of 4

Date: 05/13-05/20/2005

Lead, cadmium, and zinc concentrations increased in the sediment after the 1940's. The increase in heavy metals is probably related either to increased input to the lake from local industrial activities or the use of lead shot by local waterfowl hunters. Our results provide a physical record of contamination that is consistent with Colten's (1988) description of hazardous waste disposal in the American Bottoms.

This text is excerpted from http://www.il-st-acad-sci.org/transactions/96_3a.html , Transactions of the Illinois State Academy of Science Volume 96, number 3, 2003. This indicates that the study did not specifically study the area around the US Steel GCW discharge point. It indicates that the study authors acknowledged that lead shot from hunting activities is a source of Lead in the lake water. The finding of cadmium is not relevant, as Cadmium is not found in the US Steel GCW effluent, and Zinc is limited in the permit by the federal effluent limitation guidelines.

IEPA EXHIBIT

No. 84



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 - (217) 782-3397

JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 - (312) 814-6026

ROD R. BLAGOJEVICH, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

217/782-0610

March 31, 2006

C. Daniel Baker Jr.
United States Steel Law Department
600 Grant Street
Pittsburg, Pennsylvania 15219

**Re: United States Steel Corp. - Granite City Works
NPDES Permit No. IL0000329
Rescission and Reissuance of NPDES Permit**

Dear Mr. Baker:

In order to be consistent with procedural regulations, the Agency has made the decision to rescind the Granite City Works NPDES permit issued March 8, 2006 and reissue this subject permit on March 31, 2006. The effective date of the permit will remain April 1, 2006. There will be no lapse in permit coverage since the permit issued March 8th is not yet effective. Therefore, an administrative continuance of the expired NPDES permit remains in effect until the effective date of the reissued NPDES permit. The reissuance of the Granite City Works NPDES permit will reset the permit appeal time period so that parties who filed timely comments on the draft NPDES permit, on or before January 18, 2005, will have a full 35 days with which to consider the Agency's responses.

The Agency appreciates your cooperation in this matter. If you have any questions or comments regarding this issue please contact Blaine Kinsley of my staff at the address or telephone number listed above.

Sincerely,

Alan Keller, P.E.
Manager, Permit Section
Division of Water Pollution Control

Enclosure: NPDES permit
cc: Records Unit
Collinsville Region

SAK:bak:l:\1296\docs\permits\gcsteelrescission.doc

IEPA EXHIBIT

No. 85



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 - (217) 782-3397

JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 - (312) 814-6026

ROD R. BLAGOJEVICH, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

217/782-0610

March 31, 2006

Kathleen Logan Smith
Health & Environmental Justice-St. Louis
P.O. Box 2038
St. Louis, Missouri 63158

Re: United States Stee-Granite City Works
NPDES Permit No. IL0000329
Rescission and Reissuance of NPDES Permit

Dear Ms. Smith:

This letter is to inform you that in order to be consistent with procedural regulations the Agency has made the decision to rescind the above referenced NPDES permit that was issued March 8, 2006 and reissue this subject permit on March 31, 2006. The reissuance of the Granite City Works permit will reset the permit appeal time period so that you and other parties who filed timely comments on the draft permit, on or before January 18, 2005, will have 35 days with which to consider the Agency's responses. A copy of the Agency response letter to you dated March 24, 2006 is enclosed for your convenience along with a copy of the reissued NPDES permit.

Should you have any questions or comments regarding the above, please contact Blaine Kinsley of my staff at the indicated telephone number and address. Thank you very much for participation in the NPDES process.

Sincerely,

Alan Keller, P.E.
Manager, Permit Section
Division of Water Pollution Control

Enclosures: NPDES Permit
Response letter
Cc: Collinsville FOS
Records
Binds

SAK:bak\L:epa1269\docs\0000329resc.doc



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 - (217) 782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 - (312) 814-6026

ROD R. BLAGOJEVICH, GOVERNOR DOUGLAS P. SCOTT, DIRECTOR

217/782-0610

March 24, 2006

Kathleen Logan Smith
Health & Environmental Justice-St. Louis
P.O. Box 2038
St. Louis, Missouri 63158

Re: United States Stee-Granite City Works
NPDES Permit No. IL0000329
Response to Comment Letter

Dear Ms. Smith:

Thank you for your letter dated January 17, 2005 in which you express your concern for the reissuance of the above referenced permit. The Illinois EPA apologizes for the delay in responding to your concerns after the issuance of the permit. In response to your concern the Illinois EPA offers the following responses.

1. Horseshoe Lake impairment and concern over discharges of lead and ammonia by Granite City Works (GCW).

Response. As you are aware, lead is not listed as an impairment of Horseshoe Lake. Fish consumption advisories have been issued for Channel Catfish and Carp because of PCB's. GCW is not listed as a source of impairment. The Illinois EPA has taken note of your concern, both in your comment letter regarding GCW and in your comments during recent 303(d) hearings at the Agency. In addition, lead is not used as a raw material or an additive in the steel making process. The increased load limit for lead is based on Federal Categorical production standards. These standards must be placed in categorical discharge permits regardless of the reasonable potential of any one parameter to exceed a water quality standard. Regarding ammonia, the permit reflects revised ammonia water quality standards which were not in place at the time of the last renewal.

2. Compliance history of GCW.

Response. The Agency is aware of the compliance history of the GCW facility. The Agency has taken, and will continue to take, all necessary and appropriate action regarding compliance issues with this facility.

Should you have any questions or comments regarding the above, please contact Blaine Kinsley of my staff at the indicated telephone number and address. Thank you very much for participation in the NPDES process.

to the end of the public comment period. Specifically, the comment letter received from the Washington University Civil Justice Clinic/Interdisciplinary Environmental Clinic dated December 9 2005. The Agency regrets that you were unable to attend a scheduled meeting on the above mentioned issues on March 14, 2006. We are still willing to meet with you should you wish to reschedule. Should you have any questions or comments regarding the above, please contact Blaine Kinsley of my staff at the indicated telephone number and address. Thank you very much for participation in the NPDES process.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Keller", with a stylized, cursive script.

Alan Keller, P.E.
Manager, Permit Section
Division of Water Pollution Control

SAK:bak\L:epa1269\docs\0000329.doc

Attachment: NPDES Permit

cc: Binds

IEPA EXHIBIT

No. 86



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 - (217) 782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 - (312) 814-6026

ROD R. BLAGOJEVICH, GOVERNOR DOUGLAS P. SCOTT, DIRECTOR

217/782-0610

March 31, 2006

American Bottoms Conservancy
Health and Environmental Justice-St. Louis
Neighborhood Law Office
Sierra Club
Webster Groves Nature Society
C/o Kathy Andria
607 North 7th Street
East St. Louis, Illinois 62201

Re: United States Steel-Granite City Works
NPDES Permit No. IL0000329
Rescission and Reissuance of NPDES Permit

Dear Ms. Andria:

This letter is to inform you that in order to be consistent with procedural regulations the Agency has made the decision to rescind the above referenced NPDES permit that was issued March 8, 2006 and reissue this subject permit on March 31, 2006. The reissuance of the Granite City Works permit will reset the permit appeal time period so that you and other parties who filed timely comments on the draft permit, on or before January 18, 2005, will have 35 days with which to consider the Agency's responses. A copy of the Agency response letter to you dated March 24, 2006 is enclosed for your convenience along with a copy of the reissued NPDES permit.

Should you have any questions or comments regarding the above, please contact Blaine Kinsley of my staff at the indicated telephone number and address. Thank you very much for participation in the NPDES process.

Sincerely,

Alan Keller, P.E.
Manager, Permit Section
Division of Water Pollution Control

Enclosures: NPDES Permit
Response letter
Cc Collinsville FOS
Records
Binds



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. Box 19276, SPRINGFIELD, ILLINOIS 62794-9276 - (217) 782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 - (312) 814-6026

ROD R. BLAGOJEVICH, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

217/782-0610

March 24, 2006

American Bottoms Conservancy
Health & Environmental Justice-St. Louis
Neighborhood Law Office
Sierra Club
Webster Groves Nature Society
C/o Kathy Andria
607 North 7th Street
East St. Louis, Illinois 62201

Re: United States Stee-Granite City Works
NPDES Permit No. IL0000329
Response to Comment Letter

Dear Ms. Andria:

Thank you for your letter dated January 18, 2005 in which you express your concern for the reissuance of the above referenced permit. The Illinois EPA apologizes for the delay in responding to your concerns after the issuance of the permit. In response to your concern the Illinois EPA offers the following responses.

1. Horseshoe Lake impairment and concern over discharges of lead and ammonia by Granite City Works (GCW).
Response. As you are aware, lead is not listed as an impairment of Horseshoe Lake. Fish consumption advisories have been issued for Channel Catfish and Carp because of PCB's. GCW is not listed as a source of impairment. The Illinois EPA has taken note of your concern, both in your comment letter regarding GCW and in your comments during recent 303(d) hearings at the Agency. In addition, lead is not used as a raw material or an additive in the steel making process. The increased load limit for lead is based on Federal Categorical production standards. These standards must be placed in categorical discharge permits regardless of the reasonable potential of any one parameter to exceed a water quality standard. Regarding ammonia, the permit reflects revised ammonia water quality standards which were not in place at the time of the last renewal.
2. Compliance history of GCW.
Response. The Agency is aware of the compliance history of the GCW facility. The Agency has taken, and will continue to take, all necessary and appropriate action regarding compliance issues with this facility.

In addition to the responses to the above comments, which were received prior to the end of the public notice period, responses are being generated for the comments that were received subsequent

ROCKFORD - 4302 North Main Street, Rockford, IL 61103 - (815) 987-7760 • DES PLAINES - 9511 W. Harrison St., Des Plaines, IL 60016 - (847) 294-4000
ELGIN - 595 South State, Elgin, IL 60123 - (847) 608-3131 • PEORIA - 5415 N. University St., Peoria, IL 61614 - (309) 693-5463
BUREAU OF LAND - PEORIA - 7620 N. University St., Peoria, IL 61614 - (309) 693-5462 • CHAMPAIGN - 2125 South First Street, Champaign, IL 61820 - (217) 278-5800
SPRINGFIELD - 4500 S. Sixth Street Rd., Springfield, IL 62706 - (217) 786-6892 • COLLINSVILLE - 2009 Mall Street, Collinsville, IL 62234 - (618) 346-5120
MARION - 2309 W. Main St., Suite 116, Marion, IL 62959 - (618) 993-7200

to the end of the public comment period. Specifically, the comment letter received from the Washington University Civil Justice Clinic/Interdisciplinary Environmental Clinic dated December 9 2005. The Agency regrets that you were unable to attend a scheduled meeting on the above mentioned issues on March 14, 2006. We are still willing to meet with you should you wish to reschedule. Should you have any questions or comments regarding the above, please contact Blaine Kinsley of my staff at the indicated telephone number and address. Thank you very much for participation in the NPDES process.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Keller". The signature is fluid and cursive, with the first name "Alan" written in a larger, more prominent script than the last name "Keller".

Alan Keller, P.E.
Manager, Permit Section
Division of Water Pollution Control

SAK:bak\L:epa1269\docs\0000329.doc

Attachment: NPDES Permit

cc: Binds

MAJOR

NPDES Permit No. IL0000329
Illinois Environmental Protection Agency
Division of Water Pollution Control
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

Reissued (NPDES) Permit

Expiration Date: March 31, 2011

Issue Date: March 31, 2006
Effective Date: April 1, 2006

Name and Address of Permittee:

United States Steel Corporation
Granite City Works
20th and State Streets
Granite City, Illinois 62040

Facility Name and Address:

United States Steel Corporation
Granite City Works
20th and State Streets
Granite City, Illinois 62040

Discharge Number and Name:

001 Treated Process Wastewater
A01 Coke By-Products Wastewater
B01 Cold Rolling Mill Wastewater
C01 Landfill Leachate Wastewater

Receiving Waters:

Horseshoe Lake

In compliance with the provisions of the Illinois Environmental Protection Act, Title 35 of Ill. Adm. Code, Subtitle C and/or Subtitle D, Chapter 1, and the Clean Water Act (CWA), the above-named permittee is hereby authorized to discharge at the above location to the above-named receiving stream in accordance with the standard conditions and attachments herein.

Permittee is not authorized to discharge after the above expiration date. In order to receive authorization to discharge beyond the expiration date, the permittee shall submit the proper application as required by the Illinois Environmental Protection Agency (IEPA) not later than 180 days prior to the expiration date.



Alan Keller, P.E.
Manager, Permit Section
Division of Water Pollution Control

SAK:BMB:04090101.bah

NPDES Permit No. IL0000329

Effluent Limitations and Monitoring

1. From the effective date of this permit until the expiration date, the effluent of the following discharge(s) shall be monitored and limited at all times as follows:

Outfall(s): 001 Treated Process Wastewater

PARAMETER	LOAD LIMITS lbs/day DAF (DMF)		CONCENTRATION LIMITS mg/l		SAMPLE FREQUENCY	SAMPLE TYPE
	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM		
Flow (MGD)	See Special Condition 1				Measure When Monitoring	
pH	See Special Condition 2		6.0 - 9.0		2/Week	Grab
CBOD ₅	2085	4170	10	20	2/Week	Composite
Total Suspended Solids	2502	5004	12	24	2/Week	Composite
Oil & Grease	1511	3492	15	30	2/Week	Grab
Iron (total)	417	834	2	4	2/Week	Composite
Iron (dissolved)		209		1	2/Week	Composite
Lead (total)	5.6	17	0.09	0.4	1/Quarter	Composite
Zinc (total)	12	56	0.17		2/Week	Composite
Cyanide (total)	19	35	0.1	0.2	2/Week	Mathematical Composite**
Cyanide (available by 01A 1677)	1.1	4.6	0.01	0.02	2/Month	Mathematical Composite**
Phenol (4AAP)	5.0	10		0.1	2/Week	Composite
Fluoride		834		4	2/Week	Composite
Ammonia-Nitrogen*						
Spring/Fall	584	3128	2.8	15	2/Week	Composite
Summer	459	3128	2.2	15	2/Week	Composite
Winter	1501	3128	7.2	15	2/Week	Composite
March	834	3128	4.0	15	2/Week	Composite

*For Ammonia as Nitrogen, Spring/Fall is April-May and September-October. Summer is June-August. Winter is November-February. Weekly average limits will apply. For Spring/Fall, weekly average limit is 7.0 mg/L (1460 lb/day). Summer weekly average limit is 5.5 mg/L (1147 lb/day). March weekly average limit is 10 mg/L (2085 lb/day). No weekly average limit for Winter.

**See Special Condition 10.

NPDES Permit No. IL0000329

Effluent Limitations and Monitoring

1. From the effective date of this permit until the expiration date, the effluent of the following discharge(s) shall be monitored and limited at all times as follows:

Outfall(s): A01, B01, C01

PARAMETER	LOAD LIMITS lbs/day DAF (DMF)		CONCENTRATION LIMITS mg/l		SAMPLE FREQUENCY	SAMPLE TYPE
	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM		

Outfall A01 - Coke By-Products Wastewater

Flow (MGD)	See Special Condition 1				Continuous	Measure
Total Suspended Solids				Monitor	1/Month	Composite
Naphthalene		0.10			2/Week	Composite
Benzo(a)pyrene		0.15			2/Week	Composite

Outfall: B01 - Cold Rolling Mill Wastewater

Flow (MGD)	See Special Condition 1				When Monitoring	Measure
Tetrachloroethylene		1.1			2/Year	Grab
Naphthalene		0.73			1/Month	Grab

Outfall: C01 - Landfill Leachate Wastewater

Flow (MGD)	See Special Condition 1				Continuous	Measure
------------	-------------------------	--	--	--	------------	---------

NPDES Permit No. IL0000329

Special Conditions

SPECIAL CONDITION 1. Flow shall be reported as a daily maximum and a monthly average, and shall be reported on the monthly Discharge Monitoring Report Form.

SPECIAL CONDITION 2. The pH shall be in the range 6.0 to 9.0. The monthly minimum and monthly maximum values shall be reported on the DMR form.

SPECIAL CONDITION 3. If an applicable effluent standard or limitation is promulgated under Sections 301(b)(2)(C) and (D), 304(b)(2), and 307(a)(2) of the Clean Water Act and that effluent standard or limitation is more stringent than any effluent limitation in the permit or controls a pollutant not limited in the NPDES Permit, the Agency shall revise or modify the permit in accordance with the more stringent standard or prohibition and shall so notify the permittee.

SPECIAL CONDITION 4. The use or operation of this facility shall be by or under the supervision of a Certified Class K operator

SPECIAL CONDITION 5. For purposes of this permit, load limits for Phenol (4AAP) have been based on actual plant discharges, and load limits for Ammonia (as N) have been based on water quality standards, and are included in accordance with a 301(g) variance of the Clean Water Act approved by the USEPA. Any changes to these load limits can only be made following Public Notice and opportunity for hearing.

SPECIAL CONDITION 6. The permittee may show that an apparent noncompliance of load limits for zinc is not a violation by applying background credits for intake waters and by submission of calculations as defined below.

The load calculations for comparison to Zinc load limits shall be made as follows:

$$M = (C_e - C_i) \times F \times 8.34$$

Where:

M = Outfall 001 load limit (lbs/day)

C_e = Outfall 001 effluent concentration (mg/l)

C_i = Intake water concentration (mg/l)

F = Outfall 001 effluent flow (MGD)

Concentrations limits for outfall 001 are absolute and no background credit shall be allowed.

SPECIAL CONDITION 7. The permittee shall record monitoring results on Discharge Monitoring Report (DMR) forms using one such form for each discharge each month. Semi-annual monitoring results shall be submitted with the DMR forms for the months of June and December, and shall be submitted to the IEPA no later than July 15 and January 15 unless otherwise specified by the Agency, to the following address:

Illinois Environmental Protection Agency
Bureau of Water
Division of Water Pollution Control
Compliance Assurance Section, Mail Code #19
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-19276

SPECIAL CONDITION 8. The Permittee shall be required to conduct an effluent toxicity evaluation prior to the renewal of this permit. Elements of the toxicity evaluation should include but not be limited to the following:

A. Aquatic Toxicity Screening

Acute Toxicity - The initial acute toxicity testing should be run on at least three trophic levels of aquatic species (fish, invertebrates and plants) which represent the aquatic community for the receiving stream. Suggested species include the Fathead Minnow and Ceriodaphnia. All tests should be done in accordance with "Measuring Acute Toxicity of Effluents to Freshwater and Marine

NPDES Permit No. IL0000329

Special Conditions

Organisms (Fourth Edition)", (USEPA/600-4-90/027) and "Environmental Effects Tests Guidelines" (USEPA/560-6-82/002). The IEPA specifications and guidelines for these tests, given in "Effluent Biomonitoring and Toxicity Assessment - Aquatic Life Concerns," must also be met.

Testing shall be conducted on fish over a 96-hour period while invertebrates should be tested over a 48-hour period. Test should be performed on 100% effluent.

B Sampling Frequency

The test referenced above shall be performed during the final year of this permit. Upon completion, test results may be submitted with the facility renewal application.

SPECIAL CONDITION 9. Samples taken in compliance with the effluent monitoring requirements for internal outfall A01 shall be taken at a point representative of the discharge of Coke By-Products Wastewater, but prior to mixing with any other wastewater sources. Samples taken in compliance with the effluent monitoring requirements for internal outfall B01 shall be taken at a point representative of the discharge of Cold Rolling Mill wastewater, but prior to mixing with any other wastewater sources. Samples taken in compliance with the effluent monitoring requirements for internal outfall C01 shall be taken at a point representative of the discharge of Landfill Leachate Wastewater, but prior to mixing with any other wastewater sources. Samples taken in compliance with the effluent monitoring requirements for outfall 001 shall be taken at a point representative of the discharge, but before entering the receiving water.

SPECIAL CONDITION 10. Samples for Cyanide (available by OIA 1677) and Cyanide (total) shall consist of a series of grab samples collected over any 24-hour consecutive period, stored using methods consistent with 40 CFR 136, and combined after the collection of the last grab sample. The combined sample shall be analyzed using methods consistent with 40 CFR 136, within 24 hours of the initial sample collection.

ATTACHMENT B

Standard Conditions

Definitions

Act means the Illinois Environmental Protection Act, Ch. 111 1/2 Ill. Rev. Stat., Sec. 1001-1052 as Amended.

Agency means the Illinois Environmental Protection Agency.

Board means the Illinois Pollution Control Board.

Clean Water Act (formerly referred to as the Federal Water Pollution Control Act) means Pub. L. 92-500, as amended 33 U.S.C. 1251 et seq.

NPDES (National Pollutant Discharge Elimination System) means the national program for issuing, modifying, revoking and reissuing, terminating, monitoring and enforcing permits, and imposing and enforcing pretreatment requirements, under Sections 307, 402, 318 and 405 of the Clean Water Act.

USEPA means the United States Environmental Protection Agency.

Daily Discharge means the discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. For pollutants with limitations expressed in units of mass, the "daily discharge" is calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurement, the "daily discharge" is calculated as the average measurement of the pollutant over the day.

Maximum Daily Discharge Limitation (daily maximum) means the highest allowable daily discharge.

Average Monthly Discharge Limitation (30 day average) means the highest allowable average of daily discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.

Average Weekly Discharge Limitation (7 day average) means the highest allowable average of daily discharges over a calendar week, calculated as the sum of all daily discharges measured during a calendar week divided by the number of daily discharges measured during that week.

Best Management Practices (BMPs) means schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the State. BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

Aliquot means a sample of specified volume used to make up a total composite sample.

Grab Sample means an individual sample of at least 100 milliliters collected at a randomly-selected time over a period not exceeding 15 minutes.

24 Hour Composite Sample means a combination of at least 8 sample aliquots of at least 100 milliliters, collected at periodic intervals during the operating hours of a facility over a 24-hour period.

8 Hour Composite Sample means a combination of at least 3 sample aliquots of at least 100 milliliters, collected at periodic intervals during the operating hours of a facility over an 8-hour period.

Flow Proportional Composite Sample means a combination of sample aliquots of at least 100 milliliters collected at periodic intervals such that either the time interval between each aliquot or the volume of each aliquot is proportional to either the stream flow at the time of sampling or the total stream flow since the collection of the previous aliquot.

- (1) **Duty to comply.** The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or for denial of a permit renewal application. The permittee shall comply with effluent standards or prohibitions established under Section 307(a) of the Clean Water Act for toxic pollutants within the time provided in the regulations that establish these standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement.
- (2) **Duty to reapply.** If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit. If the permittee submits a proper application as required by the Agency no later than 180 days prior to the expiration date, this permit shall continue in full force and effect until the final Agency decision on the application has been made.
- (3) **Need to halt or reduce activity not a defense.** It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (4) **Duty to mitigate.** The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.
- (5) **Proper operation and maintenance.** The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up, or auxiliary facilities, or similar systems only when necessary to achieve compliance with the conditions of the permit.

- (6) **Permit actions.** This permit may be modified, revoked and reissued, or terminated for cause by the Agency pursuant to 40 CFR 122.62. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- (7) **Property rights.** This permit does not convey any property rights of any sort, or any exclusive privilege.
- (8) **Duty to provide information.** The permittee shall furnish to the Agency within a reasonable time, any information which the Agency may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with the permit. The permittee shall also furnish to the Agency, upon request, copies of records required to be kept by this permit.
- (9) **Inspection and entry.** The permittee shall allow an authorized representative of the Agency, upon the presentation of credentials and other documents as may be required by law, to:
 - (a) Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
 - (d) Sample or monitor at reasonable times, for the purpose of assuring permit compliance, or as otherwise authorized by the Act, any substances or parameters at any location.
- (10) **Monitoring and records.**
 - (a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.
 - (b) The permittee shall retain records of all monitoring information, including all calibration and maintenance records, and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of this permit, measurement, report or application. This period may be extended by request of the Agency at any time.
 - (c) Records of monitoring information shall include:
 - (1) The date, exact place, and time of sampling or measurements;
 - (2) The individual(s) who performed the sampling or measurements;
 - (3) The date(s) analyses were performed;
 - (4) The individual(s) who performed the analyses;
 - (5) The analytical techniques or methods used; and
 - (6) The results of such analyses.
 - (d) Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit. Where no test procedure under 40 CFR Part 136 has been approved, the permittee must submit to the Agency a test method for approval. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to ensure accuracy of measurements.
- (11) **Signatory requirement.** All applications, reports or information submitted to the Agency shall be signed and certified:
 - (a) **Application.** All permit applications shall be signed as follows:
 - (1) For a corporation: by a principal executive officer of at least the level of vice president or a person or position having overall responsibility for environmental matters for the corporation;
 - (2) For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or
 - (3) For a municipality, State, Federal, or other public agency: by either a principal executive officer or ranking elected official.
 - (b) **Reports.** All reports required by permits, or other information requested by the Agency shall be signed by a person described in paragraph (a) or by a duly authorized representative of that person. A person is a duly authorized representative only if:
 - (1) The authorization is made in writing by a person described in paragraph (a); and
 - (2) The authorization specifies either an individual or a position responsible for the overall operation of the facility, from which the discharge originates, such as a plant manager, superintendent or person of equivalent responsibility; and
 - (3) The written authorization is submitted to the Agency.

accurate because a different individual or position has responsibility for the overall operation of the facility a new authorization satisfying the requirements of (b) must be submitted to the Agency prior to or together with any reports, information, or applications to be signed by an authorized representative

acrylonitrile; five hundred micrograms per liter (500 ug/l) for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol, and one milligram per liter (1 mg/l) for antimony;

(12) Reporting requirements

- (a) **Planned changes.** The permittee shall give notice to the Agency as soon as possible of any planned physical alterations or additions to the permitted facility.
- (b) **Anticipated noncompliance.** The permittee shall give advance notice to the Agency of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.
- (c) **Compliance schedules.** Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.
- (d) **Monitoring reports.** Monitoring results shall be reported at the intervals specified elsewhere in this permit.
 - (1) Monitoring results must be reported on a Discharge Monitoring Report (DMR).
 - (2) If the permittee monitors any pollutant more frequently than required by the permit, using test procedures approved under 40 CFR 136 or as specified in the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR.
 - (3) Calculations for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified by the Agency in the permit.
- (e) **Twenty-four hour reporting.** The permittee shall report any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times; and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The following shall be included as information which must be reported within 24 hours:
 - (1) Any unanticipated bypass which exceeds any effluent limitation in the permit;
 - (2) Violation of a maximum daily discharge limitation for any of the pollutants listed by the Agency in the permit to be reported within 24 hours.

The Agency may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.
- (f) **Other noncompliance.** The permittee shall report all instances of noncompliance not reported under paragraphs (12)(c), (d), or (e), at the time monitoring reports are submitted. The reports shall contain the information listed in paragraph (12)(e).
- (g) **Other information.** Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application, or in any report to the Agency, it shall promptly submit such facts or information.

(13) Transfer of permits. A permit may be automatically transferred to a new permittee if:

- (a) The current permittee notifies the Agency at least 30 days in advance of the proposed transfer date;
- (b) The notice includes a written agreement between the existing and new permittees containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittees; and
- (c) The Agency does not notify the existing permittee and the proposed new permittee of its intent to modify or revoke and reissue the permit. If this notice is not received, the transfer is effective on the date specified in the agreement.

(14) All manufacturing, commercial, mining, and silvicultural dischargers must notify the Agency as soon as they know or have reason to believe:

- (a) That any activity has occurred or will occur which would result in the discharge of any toxic pollutant identified under Section 307 of the Clean Water Act which is not limited in the permit, if that discharge will exceed the highest of the following notification levels:
 - (1) One hundred micrograms per liter (100 ug/l);

- (3) Five (5) times the maximum concentration value reported for that pollutant in the NPDES permit application; or
- (4) The level established by the Agency in this permit.

- (b) That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant which was not reported in the NPDES permit application.

(15) All Publicly Owned Treatment Works (POTWs) must provide adequate notice to the Agency of the following:

- (a) Any new introduction of pollutants into that POTW from an indirect discharger which would be subject to Sections 301 or 306 of the Clean Water Act if it were directly discharging those pollutants; and
- (b) Any substantial change in the volume or character of pollutants being introduced into that POTW by a source introducing pollutants into the POTW at the time of issuance of the permit.
- (c) For purposes of this paragraph, adequate notice shall include information on (i) the quality and quantity of effluent introduced into the POTW, and (ii) any anticipated impact of the change on the quantity or quality of effluent to be discharged from the POTW.

(16) If the permit is issued to a publicly owned or publicly regulated treatment works, the permittee shall require any industrial user of such treatment works to comply with federal requirements concerning:

- (1) User charges pursuant to Section 204(b) of the Clean Water Act and applicable regulations appearing in 40 CFR 35;
- (2) Toxic pollutant effluent standards and pretreatment standards pursuant to Section 307 of the Clean Water Act; and
- (3) Inspection, monitoring and entry pursuant to Section 308 of the Clean Water Act.

(17) If an applicable standard or limitation is promulgated under Section 301(b)(2)(C) and (D), 304(b)(2), or 307(a)(2) and that effluent standard or limitation is more stringent than any effluent limitation in the permit, or controls a pollutant not limited in the permit, the permit shall be promptly modified or revoked, and reassued to conform to that effluent standard or limitation.

(18) Any authorization to construct issued to the permittee pursuant to 35 Ill. Adm. Code 309.154 is hereby incorporated by reference as a condition of this permit.

(19) The permittee shall not make any false statement, representation or certification in any application, record, report, plan or other document submitted to the Agency or the USEPA, or required to be maintained under this permit.

(20) The Clean Water Act provides that any person who violates a permit condition implementing Sections 301, 302, 306, 307, 308, 318, or 406 of the Clean Water Act is subject to a civil penalty not to exceed \$10,000 per day of such violation. Any person who willfully or negligently violates permit conditions implementing Sections 301, 302, 308, 307, or 308 of the Clean Water Act is subject to a fine of not less than \$2,500, nor more than \$25,000 per day of violation, or by imprisonment for not more than one year, or both.

(21) The Clean Water Act provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under permit shall, upon conviction, be punished by a fine of not more than \$10,000 per violation, or by imprisonment for not more than 6 months per violation, or by both.

(22) The Clean Water Act provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit shall, including monitoring reports or reports of compliance or non-compliance shall, upon conviction, be punished by a fine of not more than \$10,000 per violation, or by imprisonment for not more than 6 months per violation, or by both.

(23) Collected screenings, slimes, sludges, and other solids shall be disposed of in such a manner as to prevent entry of those wastes (or runoff from the wastes) into waters of the State. The proper authorization for such disposal shall be obtained from the Agency and is incorporated as part hereof by reference.

(24) In case of conflict between these standard conditions and any other conditions included in this permit, the other conditions shall govern.

(25) The permittee shall comply with, in addition to the requirements of the permit, all applicable provisions of 35 Ill. Adm. Code, Subtitle C, Subtitle D, Subtitle E, and all applicable orders of the Board.

(26) The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit is held invalid, the remaining provisions of this permit shall continue in full force and effect.

IEPA EXHIBIT

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

No. A101021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 - (217) 782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 - (312) 814-6026

ROD R. BLAGOIEVICH, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

Memorandum

Date: February 8, 2006
To: Marcia Willhite
From: Toby Freyert *TF/SK*
Subject: U.S. Steel-Granite City Works (NPDES Permit No. IL0000329)

This memo serves to recommend that the United States Steel, Granite City Works, (USSGCW) NPDES permit (No. IL0000329) be issued without any further delay. The reasons for this recommendation are that the issues raised by environmental groups regarding permit limits and past violations are easily answered, and the overall concerns for Horseshoe Lake have been and continue to be addressed in 303(d) discussions and hearings that have opportunity for public participation. The comments do not provide any additional information the Agency would use for inclusion in the reissued permit.

The Agency received a comment letter from the American Bottoms Conservancy (ABC) et al before the close of the Public Notice period, and continues to receive comments from The ABC (Kathy Andria) and its associates at the Washington University Civil Justice/Interdisciplinary Environmental Clinic. Since only comments received prior to the close of Public Notice can be considered in determining the merits for granting of Public Hearing, the discussion herein will focus on those points. However, it should be noted that responses to all comments and questions will be generated and disseminated to the interested parties.

The concerns expressed by ABC in its letter to Marcia Willhite, dated January 18, 2005 center on USSGCW's discharge to Horseshoe Lake. Specifically, the comments cite impairments to the lake as detailed in the 303(d) report and couple the impairments with the observation that Horseshoe Lake provides some sustenance to low income persons in the area who consume fish from the lake. The comments also take issue with the Draft NPDES permit in that it allows for an increase in the loading of lead and ammonia to the lake. With regard to the lead concern, it should be noted that lead is not listed as an impairment of Horseshoe Lake. The listed fish consumption concern is due to PCB's. In Addition, USSGCW does not use lead in its processes or as a raw material. A lead limit appears in the NPDES permit solely due to Federal Categorical regulatory requirements that would apply to any steel mill in that category. The permit limits for categorical steel mills are production based. Therefore, any increase in production would necessitate a corresponding increase in limits for all categorical parameters (including lead in this case). This creates a paper increase, which is confusing to citizens, and advocacy groups. With regard to ammonia, the difference in the limits in the draft permit and the current permit reflects a revision in the water quality criteria used to develop standards. The same flow was used to calculate the limits in both the current permit and the draft. Back-sliding of the limits is not an issue due to the compliance history of the facility. In addition, the comment letter discusses potential violations of the current permit. The Agency is aware of the issues and has taken action to resolve them.

As a final note, it should be mentioned that the American Bottoms Conservancy did participate in a recent hearing regarding 303(d) listed water bodies and did make specific comments regarding Horseshoe Lake.

ROCKFORD - 4302 North Main Street, Rockford, IL 61103 - (815) 987-7760 • DES PLAINES - 9511 W. Harrison St., Des Plaines, IL 60016 - (847) 294-4000
 ELGIN - 595 South State, Elgin, IL 60123 - (847) 608-3131 • PEORIA - 5415 N. University St., Peoria, IL 61614 - (309) 693-5463
 BUREAU OF LAND - PEORIA - 7620 N. University St., Peoria, IL 61614 - (309) 693-5462 • CHAMPAIGN - 2125 South First Street, Champaign, IL 61820 - (217) 278-5800
 SPRINGFIELD - 4500 S. Sixth Street Rd., Springfield, IL 62706 - (217) 786-6892 • COLLINSVILLE - 2009 Mall Street, Collinsville, IL 62234 - (618) 346-5120
 MARION - 2309 W. Main St., Suite 116, Marion, IL 62959 - (618) 993-7200

C 286

IEPA EXHIBIT

No. A12

From: Marcia Willhite
To: Scott, Doug
Date: 2/27/2006 3:20:05 PM
Subject: NPDES permit for U.S. Steel-Granite City

Doug, we received a hearing request on the renewal of this permit last year. Regrettably, due to staff losses, a year has passed since we public noticed the permit. Yet this request is still outstanding. We would like to move forward to issue the permit and recommend that a meeting with the environmental group be held instead of a public hearing.

American Bottoms Conservancy (Kathy Andria, principal) requested the hearing due to concerns about increased loading of pollutants to Horseshoe Lake. There will be no actual increase in loading--the limits in the draft renewal permit are different than the previous permit for reasons that are easily explained.

Since hearings are held at the discretion of the Director, I'm asking if you would be comfortable with us denying the hearing request, but having a meeting and issuing the permit as quickly as possible.

Marcia T. Willhite
Chief
Bureau of Water
IL Environmental Protection Agency
Marcia.Willhite@epa.state.il.us
Phone: 217/782-1654
Fax: 217/782-5549

CC: Elzinga, Sherrie; Frevert, Toby; Killian, Bernie

IEPA EXHIBIT

No. A15

From: Blaine Kinsley
To: Elzinga, Sherrie; Frevert, Toby; Keller, Al; Wilhite, Marcia
Date: Thu, Mar 9, 2006 2:58 PM
Subject: Granite City Steel meeting

There will be a meeting at the Agency on March 15th with Kathy Andria to discuss Horseshoe Lake, Frank Holten State Park and issues regarding the Granite City Steel NPDES permit. I called Helen Hawkins (Madison County Board Member) and invited her to the meeting, but she had to decline due to other commitments. I agreed to send her a summary of the meeting and she said she was confident that we would work things out.

Please let me know if there is something else that needs to be done in this matter.

Blaine

IEPA EXHIBIT

No. A18

From: Ken Page
 To: Kathy Andria
 Date: Tue, Mar 14, 2006 3:18 PM
 Subject: Re: Horseshoe Lake EJ meeting

Kathy,

As discussed this was an EJ meeting to discuss the subsistence fishing issues at Horseshoe Lake that you raised. I will inform everyone of your decision. Thank you.

Kenneth L. Page, Manager
 Office of Compliance Assistance and Environmental Justice
 Illinois EPA
 1021 N. Grand Ave. East
 P.O.Box 19276
 Springfield, Illinois 62794-9276
 217-524-1284

>>> "Kathy Andria" <abc@prairienet.org> 3/14/2006 1:24 PM >>>

Ken: I regret to say we will be unable to come to Springfield for this meeting. Some of the people from the community were unable to attend on such short notice because of scheduling conflicts. Others felt the meeting should be held locally so that more people from the community could attend. They also thought the Agency should hold a public hearing on the Granite City Steel NPDES discharge permit into Horseshoe Lake and that this meeting could be viewed as an attempt to circumvent that. We are unsure as to the status of the NPDES and our repeated requests for a public hearing.

Could you help to clarify the purpose of the meeting you are proposing? I do appreciate the Agency's desire to address subsistence fishing at Horseshoe Lake and Frank Holten State Park. But, as you are well aware, we need to be inclusive of those most affected. Thank you. Kathy

> Ken Page, Bruce Yurdin, Al Keller and Tom Hornshaw. Maybe Ron Burke and other staff from bureau of water. Thanks.

>
 > KPage.

>>>> "Kathy Andria" <abc@prairienet.org> 3/7/2006 10:47 AM >>>>

> Thanks, Ken, for scheduling the meeting. I have forwarded it on to others
 > working on this issue. Who all from the Agency will be at the meeting?

> I
 > would also like to include Frank Holten State Park in the discussion. Kathy

>> Kathy,
 >> The Agency has scheduled the Environmental Justice meeting for
 >> Wednesday, March 15th at 10:00 am here at Headquarters in
 > Springfield.
 >> We will discuss subsistence fishing at Horseshoe Lake. Hopefully
 > this
 >> time works for you. This is the time that I could bring the key

> people
>> in the Agency together. Please let me know if there are any
> problems.
>> Thank you.
>> Kenneth L. Page, Manager
>> Office of Compliance Assistance and Environmental Justice
>> Illinois EPA
>> 1021 N. Grand Ave. East
>> P.O. Box 19276
>> Springfield, Illinois 62794-9276
>> 217-524-1284
>