BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

UNITED STATES STEEL CORPORATION,	)	
Petitioner,	)	
v.	)	PCB 27-03 Permit Appeal – Water
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,	)	
Respondent.	)	

NOTICE OF FILING

PLEASE TAKE NOTICE that on October 26, 2026, we electronically filed with the Clerk of the Illinois Pollution Control Board, United States Steel Corporation's Amended Petition for Review of Illinois EPA's Issuance of a NPDES Permit, a copy of which is herewith served upon you.

Dated: Oct. 26, 2026

Respectfully submitted,

UNITED STATES STEEL CORPORATION

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UNITED STATES STEEL CORPORATION'S AMENDED PETITION FOR REVIEW OF ILLINOIS EPA'S ISSUANCE OF AN NPDES PERMIT

NOW COMES the Petitioner, United States Steel Corporation ("U. S. Steel"[1]), by its attorneys, Barnes & Thornburg LLP, and, pursuant to the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/40(a)(1), hereby submits its Amended Petition for Review to the Illinois Pollution Control Board ("Board") to appeal the Illinois Environmental Protection Agency's ("Illinois EPA" or "Agency") issuance of a National Pollutant Discharge Elimination System ("NPDES") permit to U. S. Steel ("2026 Permit") as it relates to U. S. Steel's Granite City Works steel-making and processing facility located at 1951 State Street, Granite City, Illinois (the "GCW Facility").[2]

In support of this Petition, U. S. Steel respectfully states as follows:[3]

I. RECORD OF APPEAL

1. Prior to the 2026 Permit, the GCW Facility operated under an NPDES permit that was effective as of January 28, 2021 ("2021 Permit"). Ex. A.

[1] U. S. Steel's official corporate name includes an extra space after the "U." as written herein.
[2] U. S. Steel and Illinois EPA are each a "Party" and collectively, the "Parties."
[3] U. S. Steel reserves its rights to further amend this Petition, including based on subsequent filings in this matter.

2. U. S. Steel submitted a timely application to renew the NPDES permit by letter dated July 31, 2025. Ex. B.

3. Illinois EPA issued a public notice of the fact sheet and draft permit on April 7, 2026. Ex. C.

4. U. S. Steel provided its comments to the public notice of the draft permit by letter dated May 29, 2026. Ex. D.

5. Illinois EPA issued a response to one of U. S. Steel's comments and the final 2026 Permit in a letter dated June 24, 2026. Ex. E.

II. THIS AMENDED PETITION FOR REVIEW IS TIMELY FILED

6. On September 3, 2026, the Board issued an order in this matter allowing U. S. Steel until October 27, 2026, to file an amended petition for review of the 2026 Permit. Therefore, this Amended Petition for Review is timely filed.

III. BACKGROUND

A. Facility Information

7. The GCW Facility is situated along the northwest shore of Horseshoe Lake. The facility has one outfall point into the lake and takes in water used for both process and cooling purposes through its intake structure from the nearby Chain of Rocks Canal, a man-made canal connected to the Mississippi River. *See* Map of GCW Facility, Ex. F.

8. The GCW Facility operates a recirculating water system that serves its process and cooling water needs. Primary water sources for the GCW Facility include municipal water, groundwater from an onsite well, and stormwater. Recycling Flow Diagram of GCW Facility, Ex. G. After use in plant operations, water is collected, treated, and returned to a recycled water pump station, which redistributes it to plant operations throughout the facility. *Id.* Two on-site lagoons

and a reservoir hold the recirculated water when it is not in use. Ex. F. Water continuously recirculates among plant operations, storage, and the pump station.

9. When new water is needed to make up water lost to evaporation or blowdown (which is discharged after treatment through the GCW Facility's NPDES-permitted outfall), U. S. Steel draws in additional municipal water, groundwater, stormwater, or water from the Chain of Rocks Canal intake structure. Ex. G.

10. All water used at the GCW Facility—whether municipal water, groundwater, stormwater, or water from the Mississippi River—is comingled and becomes part of the facility-wide recycling system. All of the water is used for both process and cooling purposes as needed and *none* of the water withdrawn from the Chain of Rocks Canal is used exclusively for cooling purposes. In addition, all water is treated before entering the facility-wide recycling system or being discharged as blowdown.

B. Regulatory History

i. Section 316(b) of the Clean Water Act

11. Section 316(b) of the Clean Water Act provides that any applicable standard "shall require that the location, design, construction, and capacity of cooling water intake structures reflect the best technology available for minimizing adverse environmental impact." 33 U.S.C. § 1326(b).

12. The United States Environmental Protection Agency ("U.S. EPA") promulgated regulations implementing CWA section 316(b) found at 40 C.F.R. §§ 125.80–.99 (the "316(b) Regulations") on August 15, 2014. Final Regulations to Establish Requirements for Cooling Water Intake Structures, 79 Fed. Reg. 48,300 (Aug. 15, 2014). The 316(b) Regulations provide that "[o]btaining cooling water from a public water system, using reclaimed water from wastewater treatment facilities or desalination plants, or recycling treated process wastewater effluent as

cooling water ***does not constitute use of a cooling water intake structure***." 40 C.F.R. § 125.91(c) (emphasis added).

13. A facility is subject to the 316(b) Regulations only if (1) it is a point source; (2) it uses a cooling water intake structure with a cumulative design intake flow greater than 2 million gallons per day ("mgd"); and (3) "twenty-five percent or more of the water the facility withdraws on an actual intake flow basis is used ***exclusively*** for cooling purposes." 40 C.F.R. § 125.91(a) (emphasis added).

14. The 316(b) Regulations define "cooling water" as "water used for contact or non-contact cooling . . . . Cooling water obtained from a public water system, reclaimed water from wastewater treatment facilities or desalination plants, treated effluent from a manufacturing facility, or cooling water that is used in a manufacturing process either before or after it is used for cooling as process water, ***is not considered cooling water for the purposes of calculating the percentage of a facility's intake flow*** that is used for cooling purposes in § 125.91(a)(3)." 40 C.F.R. § 125.92(e) (emphasis added).

15. Originally, U.S. EPA divided its 316(b) rulemaking into three phases: the 2001 Phase I regulation addressed new facilities; the 2004 Phase II regulation addressed large, existing electric utility facilities; and the 2006 Phase III regulation addressed the remaining electric generating facilities and existing manufacturing facilities. In January 2007, the Phase II and III rules were remanded to U.S. EPA following litigation. *Riverkeeper, Inc.* v. *EPA,* 475 F.3d 83, (2d Cir., 2007). Upon review, U.S. EPA found that it could address all facilities in a single rulemaking and did so in 2014. 79 Fed. Reg. at 48,305.

16. On August 10, 2000, U.S. EPA proposed a rule to apply to new facilities that (1) were point sources, (2) had a design intake flow greater than 2 mgd, and (3) used at least 25 percent

of the water withdrawn for cooling purposes. Proposed Regulations Addressing Cooling Water Intake Structures for New Facilities, 65 Fed. Reg. 49,060, 49,063 (Aug. 10, 2000).

17. The U.S. Small Business Administration's Office of the Chief Counsel for Advocacy commented out of concern that the rule would lead to less reuse of water in the industry and greater amounts of thermal pollution and energy use. U.S. EPA responded by acknowledging that facilities often use process water for cooling functions and that "[i]f such uses of water would constitute a 'cooling water' function for purposes of applicability of the 316(b) standards, then in some cases facilities would be compelled to cease these practices, with substantial adverse environmental and energy consequences." Ex. H.

18. In the final Phase I rulemaking, U.S. EPA acknowledged that several commenters were concerned that this threshold would discourage manufacturers from recycling process water. U.S. EPA responded to this concern in the final rule by amending the definition of "cooling water," explaining that "cooling water that is used in a manufacturing process, ***either before or after it is used for cooling***, is considered process water for purposes of calculating the percentage of a new facility's intake flow that is used for cooling and whether that percentage exceeds 25 percent." Final Regulations Addressing Cooling Water Intake Structures for New Facilities, 66 Fed. Reg. 65,256, 65,288 (Dec. 18, 2001) (emphasis added). U.S. EPA retained this clarification through all subsequent 316(b) rulemaking actions.

19. In its 2002 Phase II proposed rulemaking, U.S. EPA again noted that "water used for both cooling and non-cooling purposes would not count towards the 25 percent threshold." Proposed Regulations to Establish Requirements for Cooling Water Intake Structures at Phase II Existing Facilities, 67 Fed. Reg. 17,122, 17,130 (Apr. 9, 2002). The final Phase II rule incorporated the phrase "exclusively for cooling purposes" into the 25 percent threshold requirement. Final

Regulations to Establish Requirements for Cooling Water Intake Structures at Phase II Existing Facilities, 69 Fed. Reg. 41,576, 41,580 (July 9, 2004). This rulemaking adopted the same definition of "cooling water" as the Phase I rule, explicitly excluding "water used in a manufacturing process ***either before or after*** it is used for cooling." *Id.* (emphasis added). U.S. EPA reasoned that this explicit carve-out was required because it was a common practice for intake structures to bring in water for a multitude of purposes but "only the intake water used exclusively for cooling purposes is counted when determining whether the 25 percent threshold . . . is met." *Id.* at 41,580.

20. In the 2004 Phase III proposed rulemaking, U.S. EPA retained the "exclusivity" provision and the "cooling water" definition from the Phase II rulemaking. Proposed Regulations to Establish Requirements for Cooling Water Intake Structures at Phase III Facilities, 69 Fed. Reg. 68,444 (Nov. 24, 2004). U.S. EPA noted that it is necessary to make this distinction for manufacturers who "often seek to reduce water use and increase efficiency through water reuse. [U.S.] EPA does not wish to create a disincentive to such improved efficiency and recognizes that doing so could result in other forms of environmental impacts." *Id.* at 68,454.

21. One commenter on the Phase III proposed rule requested clarification as to whether water withdrawn for processing (and not specifically for cooling) is counted when calculating the threshold. U.S. EPA noted that processing water is considered part of the total withdrawn water, but not part of the cooling water counted toward the 25 percent threshold. U.S. EPA, Response to Public Comments: Final Regulations to Establish Requirements for Cooling Water Intake Structures at Phase III Facilities, at 100 (June 1, 2006). The final Phase III rule retained the "exclusivity" provision and the previously discussed "cooling water" definition. Final Regulations to Establish Requirements for Cooling Water Intake Structures at Phase III Facilities, 71 Fed. Reg. 35,006, 35,008 (June 16, 2006).

22. Following litigation over the 316(b) Regulations, U.S. EPA consolidated the separate phased rulemaking actions into a single rule. On April 20, 2011, U.S. EPA proposed the consolidated rule with provisions "to ensure that the rule does not discourage the reuse of cooling water for other uses such as process water." Cooling Water Intake Structures at Existing Facilities and Phase I Facilities, 76 Fed. Reg. 22,174, 22,192 (Apr. 20, 2011). U.S. EPA repeated its point that water used in manufacturing processes "***either before or after*** it is used for cooling is process water and ***would not be considered cooling water*** . . .." *Id.* (emphasis added). In the 2011 proposed rule, U.S. EPA made its intent clear: "to promote water reuse in the proposed rule by specifically exempting wastewater, process water, and other gray water (***even when used for cooling***) from the definition of cooling water used in this calculation." *Id.* at 22,249 (emphasis added).

23. On August 15, 2014, U.S. EPA finalized the definition of "cooling water" that excludes water used for manufacturing processes before or after it is used for cooling and the provision that requires only water "used exclusively for cooling" to be counted towards the 25 percent applicability threshold. *See* 40 C.F.R. §§ 125.91(a)(3), 125.92(e). The 2014 final rule reiterates U.S. EPA's reasoning: that the 316(b) Regulations "promote the reuse of water from certain sources for cooling . . . [to] ensure that the rule does not discourage the reuse of cooling water for other uses such as process water." 79 Fed. Reg. at 48,305. In combination, the explicit carve-out of process water used before or after cooling and the addition of "exclusively for cooling purposes" in the 25 percent threshold requirement made clear that U.S. EPA did not intend for water used for processing, either before or after it is used for cooling, to be considered "cooling water" for purposes of the 316(b) Regulations.

ii. Illinois PFAS Legislation

24. In July 2026, Illinois amended its Environmental Protection Act to require that NPDES permits authorizing facility discharges include sampling for perfluoroalkyl and polyfluoroalkyl substances ("PFAS"). Pub. Act No. 104-0747, 2026 Ill. Laws ___ (amending 415 ILCS 5/39).

25. For industrial facilities, the amendment requires "periodic effluent sampling" for PFAS. *Id.* at § 39(b). If PFAS are not detected above the "minimum level of quantification" after two consecutive years of sampling, the permittee may request a modification of its sampling plan. *Id.*

C. Permit History

26. Illinois EPA first determined that the 316(b) Regulations did *not* apply to the GCW Facility in 2014: "The process wastewater is used primarily for cleaning the metal and is ***not used for cooling purposes***. The discharge is not subject to 316(b) regulations." 2014 Fact Sheet and Draft NPDES Permit, Ex. I at 4 (emphasis added). Accordingly, the 2015 NPDES permit did not contain 316(b) requirements. 2015 Final NPDES Permit, Ex. J.

27. Illinois EPA again found that section 316(b) did not apply to the GCW Facility during the 2020 NPDES permit renewal: "[t]he process wastewater is used primarily for cleaning the metal and is ***not used for cooling purposes***. The intake uses less than 25 percent for cooling purposes and is not subject to 316(b) regulations." 2020 Fact Sheet and Draft NPDES Permit, Ex. K at 4 (emphasis added). Accordingly, on January 21, 2021, Illinois EPA issued the 2021 Permit without imposing 316(b)-related requirements on the intake structure. Ex. A.

28. On July 31, 2025, U. S. Steel applied to renew its NPDES permit. In its application narrative, U. S. Steel noted that: "Since none of the water being drawn from the waters of the United States is being used exclusively for cooling purposes as required by 40 CFR Part 125.92,

316(b) regulations do not apply. U. S. Steel agrees with Illinois EPA's previous determinations that the discharge is not subject to 316(b) regulations." Ex. B at 3.

29. Because all of the water used at the facility is used as process water (regardless of whether it is used for cooling purposes before or after being recycled), Illinois EPA previously determined that the 316(b) Regulations do not apply to the GCW Facility. None of U. S. Steel's previous NPDES permits required compliance with these regulations. *See* Exs. A, J.

30. There have been no material changes to the GCW Facility's water withdrawal or recycling systems or practices since issuance of the last two NPDES permits.

31. When Illinois EPA issued a public notice of the latest draft permit renewal on April 7, 2026, 316(b)-related requirements were proposed, including conducting an Impingement Mortality and Entrainment Characterization Study. Ex. C. Illinois EPA offered no legal or factual basis for the reversal of its previous determinations; it merely proposed to apply the 316(b) Regulations to the GCW Facility without explanation. *Id.*

32. U. S. Steel submitted comments addressing Illinois EPA's unexplained reversal on May 29, 2026. Ex. D at 3. In early June, U. S. Steel met with Illinois EPA to discuss 316(b) applicability issues. U. S. Steel's position has remained consistent: the 316(b) Regulations do not apply to the GCW Facility. There have been no changes at the facility or in the regulations that would justify Illinois EPA's change in position.

33. Without providing any clear factual or legal justification, Illinois EPA changed its longstanding determination by issuing the 2026 Permit with 316(b)-related requirements included as Special Condition 14.

34. Additionally, Illinois EPA included PFAS sampling and Minimization Program requirements in the draft 2026 permit at Special Conditions 12 and 13. Ex. C at 11-15. These

provisions were not included in any previous version of the GCW Facility's NPDES permit. *See* Exs. A, J.

35. The new conditions would require U. S. Steel to concurrently test for PFAS and create a PFAS Minimization Program. Ex. C at 11-15. U. S. Steel commented on these new provisions in its response to the draft permit, requesting a delay in drafting the Minimization Program until sampling demonstrates that the GCW Facility is the source of PFAS. Ex. D at 2.

36. Illinois EPA did not respond at all to U. S. Steel's comments on the PFAS issues in the final 2026 Permit and merely incorporated the provisions as drafted. *See* Ex. E.

IV. CLAIM ONE: AMENDED PETITION FOR REVIEW OF CWA 316(b)-RELATED 2026 PERMIT CONDITIONS

37. This Claim challenges a condition of the 2026 Permit that is not applicable to the GCW Facility: Special Condition 14, which requires the GCW Facility's intake structure to meet the 316(b) requirements. This condition is not necessary to accomplish the purposes of the Act or Board Regulations because section 316(b) does not apply to the GCW Facility. *See* 415 ILCS 5/39(b).

38. The Agency's regulations do not address cooling water intake structures but require NPDES permits issued by Illinois EPA to conform to federal statutory and regulatory requirements. Therefore, this issue is governed by Section 316(b) of the federal Clean Water Act and the rules promulgated under it. 35 Ill. Adm. Code 309.141; *see Sierra Club v. IEPA and Midwest Generation, LLC*, PCB 15-189, 3 (Ill. Pollution Control Bd. Jan. 19, 2017).

39. The Board gives no deference to Illinois EPA's permitting decisions and instead reviews the record *de novo*. *City of Quincy v. Illinois EPA*, PCB 08-86, slip op. at 39 (June 17, 2010). That review is confined to the record that was before Illinois EPA when it issued its

decision, and the Board must decide the matter "exclusively on the basis of the record." 415 ILCS 5/40(e)(3).

A. Using Reclaimed Water or Recycling Treated Process Water Does Not Constitute Use of a Cooling Water Intake Structure

40. The 316(b) Regulations exclude certain water uses from regulation, including, "[o]btaining cooling water from a public water system, using reclaimed water from wastewater treatment facilities or desalination plants, or recycling treated process wastewater effluent as cooling water." 40 C.F.R. § 125.91(c). These uses do not "constitute use of a cooling water intake structure." *Id.* This is a threshold question. If the GCW Facility's water intake, use, and recycling satisfies 40 C.F.R. § 125.91(c), then its water intake is squarely not subject to 316(b).

41. U. S. Steel uses a recirculating water system, as described above. *See* Ex. G. This system recycles treated process wastewater effluent to use as cooling water. Therefore, U. S. Steel's use of this water "does not constitute use of a cooling water intake structure" under the 316(b) Regulations. 40 C.F.R. § 125.91(c). This issue is dispositive and alone warrants remand of the 2026 Permit.

42. Illinois EPA must rely on "substantial evidence" to make a permitting decision. *Ill. Env't Prot. Agency v. Ill. Pollution Control Bd.*, 386 Ill. App. 3d 375, 382 (2008). Illinois EPA has provided no such "substantial evidence" demonstrating that the GCW Facility uses a cooling water intake structure despite the plain language of 40 C.F.R. § 125.91(c).

43. Further, Illinois EPA's response to comments implies that the 316(b) Regulations create a rebuttable presumption that does not exist–that an intake structure is a "cooling water intake structure" as defined under the 316(b) Regulations unless proven otherwise. *See* Ex. E at 1 ("the facility's use of a recycle water system and its interpretation of 40 CFR §125.92 do not provide clear evidence that the facility is exempt from the applicability of Section 316(b)

requirements"). Nothing in 40 C.F.R. § 125.91 supports that presumption. Section 125.91(a) sets forth the conditions that must be met before the 316(b) Regulations apply, and Section 125.91(c) states that recycling treated process wastewater effluent as cooling water does not "constitute use of a cooling water intake structure." 40 C.F.R. § 125.91(a), (c). Applicability is a threshold determination that Illinois EPA must support with "substantial evidence" before imposing 316(b) conditions. It is not an exemption that U. S. Steel must establish. By asking U. S. Steel to disprove applicability, rather than identifying record evidence that the GCW Facility uses a cooling water intake structure, Illinois EPA effectively concedes that it lacks the "substantial evidence" required to support Special Condition 14. *See Ill. Env't Prot. Agency*, 386 Ill. App. 3d at 382.

44. For these reasons, and others that may be further developed in this proceeding, U. S. Steel requests that the Board find that the 316(b) provisions are not necessary to accomplish the purposes of the Act or Board Regulations, and that the Board remand the 2026 Permit to Illinois EPA to eliminate Special Condition 14.

B. <u>If the Board Determines that the GCW Facility Uses a Cooling Water Intake Structure, 316(b) Regulations Still Do Not Apply Because None of the Withdrawn Water is Used Exclusively for Cooling Purposes</u>

45. As discussed above, the GCW Facility does not use a cooling water intake structure under the applicable regulations. As such, the inquiry should end there and the 2026 Permit should be remanded to eliminate Special Condition 14. However, even if the GCW Facility is considered to be using a cooling water intake structure, the 316(b) Regulations apply only to facilities that meet a three-prong test: (1) it is a point source; (2) its design intake flow is greater than 2 mgd; *and* (3) 25 percent or more of the water that the facility actually withdraws is used "***exclusively*** for cooling purposes." 40 C.F.R. § 125.91(a) (emphasis added).

46. The 316(b) Regulations exclude certain water uses from the 25 percent calculation: "Cooling water obtained from a public water system, reclaimed water from wastewater treatment

facilities or desalination plants, treated effluent from a manufacturing facility, or cooling water that is used in a manufacturing process either before or after it is used for cooling as process water, ***is not considered cooling water*** for the purposes of calculating the percentage of a facility's intake flow that is used for cooling purposes in § 125.91(a)(3)." 40 C.F.R. § 125.92(e) (emphasis added).

47. As discussed above, ***all*** water at the GCW Facility, regardless of source, becomes part of the facility-wide recycling system, is comingled, and is available for ***both*** process and cooling as needed. As a result, ***no*** water is withdrawn exclusively for cooling purposes, so the GCW Facility does not meet the 25 percent threshold and the 316(b) Regulations do not apply.

48. For these reasons, and others that may be further developed in this proceeding, U. S. Steel requests that the Board find that the 316(b) provisions are not necessary to accomplish the purposes of the Act or Board Regulations, and that the Board remand the 2026 Permit to Illinois EPA to eliminate Special Condition 14.

C. Illinois EPA's Change in Position Is Not Supported by Substantial Evidence

49. The Illinois Administrative Procedure Act prohibits an agency from "materially" amending a permit without providing notice to the permittee "of the facts or conduct upon which the agency will rely on to support its proposed action." 5 ILCS 100/10-65(d); *see also* 35 Ill. Adm. Code § 309.108(b)(3), (c) (requiring Illinois EPA to provide a description for the basis of "any . . . proposed special conditions that will have a significant impact upon the discharge," including "how the conditions of the draft permit were derived"). In addition, Illinois EPA's decision to issue a permit must be supported by "substantial evidence." *Ill. Env't Prot. Agency*, 386 Ill. App. 3d at 382.

50. The GCW Facility has never been subject to CWA section 316(b) or the 316(b) Regulations. *See* Exs. A, J. Illinois EPA made explicit findings in both 2014 and 2020 that the 316(b) Regulations were not applicable to the GCW Facility. Exs. I, K.

51. The first time U. S. Steel became aware of Illinois EPA's intent to apply the 316(b) Regulations to the GCW Facility was upon receiving the 2026 draft permit provided for public notice. Ex. C. The draft permit did not explain why Illinois EPA changed its two previous determinations; it stated merely that the 316(b) Regulations were now being applied to the GCW Facility. *Id.* at 16.

52. U. S. Steel commented on the draft permit, explaining that the 316(b) Regulations do not apply to the GCW Facility. Ex. D at 3.

53. Following submission of its comments, U. S. Steel met with Illinois EPA to discuss the Agency's change in position regarding 316(b) applicability. U. S. Steel discussed its facility-wide recycling system and explained that because all the cooling water used at the facility is also used as process water, it does not qualify as "cooling water" under the 316(b) Regulations. If the GCW Facility does not use any "cooling water," then section 316(b) of the Clean Water Act cannot apply to the facility.

54. Despite U. S. Steel's comments and further attempts to explain this distinction to Illinois EPA, the agency included the 316(b)-related requirements as Special Condition 14 in the final 2026 Permit. Ex. E. Illinois EPA responded to U. S. Steel's public comments to the draft 2026 Permit with the following conclusory statement, in its entirety:

> "Based on the information currently available to the Agency, the facility's use of a recycle water system and its interpretation of 40 C.F.R. § 125.92 do not provide clear evidence that the facility is exempt from the applicability of Section 316(b) requirements. Furthermore the information submitted to date does not clearly demonstrate that less than 25 percent of the intake flow is used for cooling purposes." Ex. E at 1.

55. Illinois EPA does not have, and did not provide, any substantial evidence to reverse its previous determinations and now require the GCW Facility to conduct a full 316(b) analysis, particularly where U. S. Steel has consistently provided evidence to the contrary. There can be no

clearer demonstration that less than 25 percent of the intake flow is used for cooling purposes than where ***no flows*** are used exclusively for cooling. Illinois EPA's failure to provide notice of the facts or conduct on which it relied in making a material amendment to the GCW Facility's NPDES permit violates the Illinois Administrative Procedure Act and is contrary to precedent. *Ill. Env't Prot. Agency*, 386 Ill. App. 3d at 382.

56. Furthermore, Illinois EPA's brief explanation indicates it is treating the applicability of the 316(b) Regulations as a ***rebuttable presumption*** which U. S. Steel must overcome. This approach is not supported by law or regulation. In any event, U. S. Steel has provided technical information and explanations supporting the inapplicability of the 316(b) regulations and Illinois EPA has not countered this information with ***any*** evidence, much less "substantial evidence."

57. For these reasons, and others that may be further developed in this proceeding, U. S. Steel requests that the Board find that the 316(b) provisions are not necessary to accomplish the purposes of the Act or Board Regulations, that the record does not support Special Condition 14, and that the Board remand the 2026 Permit to Illinois EPA to eliminate Special Condition 14.

D. <u>Illinois EPA Constructively Failed to Respond to Comments</u>

58. Illinois EPA must respond to all significant comments on draft permits. 415 ILCS 5/39(f)(2); 40 C.F.R. § 124.17(a)(2).

59. Illinois EPA has not explained the rationale behind the change in its 316(b) applicability determination in any of its commentary on the draft or final 2026 Permit, nor is U. S. Steel able to discern any. *See* Exs. C, E.

60. Illinois EPA failed to respond to U. S. Steel's comment regarding 316(b) applicability in its issuance of the final 2026 Permit. Ex. E at 1. Merely stating that U. S. Steel has not provided "clear evidence that the facility is exempt" is a conclusory statement, not a substantive

response to U. S. Steel's comment, nor an explanation of why Illinois EPA rejected U. S. Steel's provided evidence that no water is used exclusively for cooling.

61. Illinois EPA's conclusory statements without a clear basis constitute a failure to respond to U. S. Steel's significant comments concerning 316(b) applicability. Therefore, Illinois EPA has not satisfied its procedural responsibilities in issuing the 2026 Permit.

62. Furthermore, Illinois EPA's brief explanation indicates it is treating the applicability of the 316(b) Regulations as a ***rebuttable presumption*** that U. S. Steel must overcome. This approach is not supported by law or regulation. In any event, U. S. Steel has provided technical information and explanations supporting the inapplicability of the 316(b) regulations and Illinois EPA has not countered this information with ***any*** evidence, much less "substantial evidence."

63. For these reasons, and others that may be further developed in this proceeding, U. S. Steel requests that the Board find that the 316(b) provisions are not necessary to accomplish the purposes of the Act or Board Regulations, and remand the 2026 Permit to Illinois EPA with instructions to correct its procedural error.

V. CLAIM TWO: AMENDED PETITION FOR REVIEW OF PFAS-RELATED 2026 PERMIT CONDITIONS

A. Illinois EPA Erroneously Rejected the Requested Reasonable Changes

64. This Claim challenges Special Condition 12 in the 2026 Permit. Illinois EPA has only recently begun regulating PFAS through NPDES permits, and U. S. Steel first learned of these new requirements upon receiving its draft 2026 Permit. Ex. C at 11-15. Special Condition 12 of the draft permit requires U. S. Steel to conduct quarterly PFAS sampling for two years; only if all results fall below the minimum level of quantification for two consecutive years may U. S. Steel request a modified monitoring plan. Ex. C at 11. At the same time it begins sampling,

U. S. Steel must also develop a PFAS Minimization Program for the GCW Facility that incorporates "best management practices." Ex. C at 14-15.

65. As drafted, Special Condition 12 fails to account for PFAS already present in the GCW Facility's source water. Because the condition measures compliance by the PFAS content of the discharge alone, it could effectively require U. S. Steel to remove PFAS it did not introduce, reducing concentrations below the background levels present in the water before it ever enters the facility. To avoid this result, U. S. Steel requested that the monitoring requirements be revised to compare discharge concentrations against influent concentrations. Ex. D at 2. Under that approach, if influent sampling shows PFAS in the source water, U. S. Steel would have the opportunity to demonstrate that its operations do not increase PFAS levels at the outfall above those attributable to the influent. Such a showing would establish that the facility is not a contributing source and would warrant reducing or eliminating the sampling requirements.

66. A meaningful PFAS Minimization Program must target the sources of PFAS, yet no data currently show whether, or to what extent, the GCW Facility's operations contribute PFAS to its process water. Without that information, any "best management practices" U. S. Steel adopts would be speculative and could direct resources toward sources that do not exist. U. S. Steel therefore requested that the Minimization Program requirement be triggered only if "four consecutive samples of the [GCW Facility's] discharge indicate PFAS above the levels observed in the source water, or the discharge PFAS levels are above the minimum level of quantification." Ex. D at 3.

67. Together, U. S. Steel's proposed revisions would allow the facility first to establish the background level of PFAS in its source water, then to compare its discharges against that baseline, and only then, if the data show a facility contribution, to develop a PFAS Minimization

Program tailored to that contribution. This sequence reflects a logical, data-driven approach: drafting of the Minimization Program should follow, not precede, the results of the sampling required under Special Condition 12.

68. For these reasons, and others that may be further developed in this proceeding, U. S. Steel requests that the Board find that the PFAS monitoring and Minimization Program provisions are not necessary to accomplish the purposes of the Act or Board Regulations. Additionally, U. S. Steel requests that the Board remand the 2026 Permit to Illinois EPA with instructions to allow U. S. Steel to request re-evaluation of the testing requirements if two consecutive years of sampling results are consistently below the levels observed in the source water. U. S. Steel requests that the Board remand the 2026 Permit to Illinois EPA with instructions to require a PFAS Minimization Program only after four consecutive samples indicate elevated PFAS levels.

B. Illinois EPA Failed to Respond to Comments Related to PFAS Issues

69. When it issues a final permit, Illinois EPA must respond to all significant comments received on the draft permit. 415 ILCS 5/39(f)(2); 40 C.F.R. § 124.17(a)(2).

70. Illinois EPA issued the final 2026 Permit without responding to U. S. Steel's comments on PFAS sampling or the PFAS Minimization Program. *See* Ex. E at 1. The Agency offered no explanation for rejecting U. S. Steel's proposals to (1) measure compliance against the PFAS levels observed in the source water, so that the GCW Facility is not held responsible for PFAS it did not introduce, and (2) establish background PFAS levels in the source water before requiring a PFAS Minimization Program.

71. These comments were significant. They raised substantive questions about the scientific basis and practical feasibility of new permit conditions, and adopting them would change both the standard against which the GCW Facility's PFAS discharges are measured and the timing

and content of its PFAS Minimization Program. Comments of this nature fall within the agency's response obligations under 415 ILCS 5/39(f)(2) and 40 C.F.R. § 124.17(a)(2), and Illinois EPA's failure to address them is an independent basis for remanding these conditions.

72. For these reasons, and others that may be further developed in this proceeding, U. S. Steel requests that the Board find that the PFAS sampling and minimization provisions are not necessary to accomplish the purposes of the Act or Board Regulations, and remand the 2026 Permit to Illinois EPA with instructions to correct its procedural error.

VI. REQUEST FOR RELIEF

WHEREFORE, as set forth above, U. S. Steel requests that the Board grant review of the 2026 Permit and remand it to Illinois EPA with an order to eliminate Special Condition 14, and amend Special Conditions 12 and 13 as requested, and reissue the 2026 Permit consistent with the law as discussed herein.

Dated: Oct. 26, 2026 Respectfully submitted,

UNITED STATES STEEL CORPORATION

By: */s/ Paul M. Drucker*

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Email: Erika.Powers@btlaw.com
Phone: (784) 489-8006

Attorneys for United States Steel Corporation

CERTIFICATE OF E-MAIL SERVICE

I, the undersigned, certify the following:

- That I have served the attached **UNITED STATES STEEL CORPORATION'S AMENDED PETITION FOR REVIEW OF ILLINOIS EPA'S ISSUANCE OF A NPDES PERMIT** by e-mail upon the Illinois Environmental Protection Agency at the e-mail address of Christina.Briggs@ilag.gov, Don.Brown@Illinois.gov, and Rebecca.Strauss@Illinois.gov.
- That my e-mail address is Paul.Drucker@btlaw.com.
- That the number of pages in the e-mail transmission is 176.
- That the e-mail transmission took place before 5:00 p.m. on the date of Oct. 26, 2026.

/s/ Paul M. Drucker
An Attorney for United States Steel Corporation

EXHIBIT A

217/782-0610

January 28, 2021

United States Steel Corporation
1951 State Street
Granite City, Illinois 62040

Re: United States Steel Corporation – Granite City Works
NPDES Permit No. IL0000329
Bureau ID: W1198130003
Final Permit

Gentlemen:

Attached is the final NPDES Permit for your discharge. The Permit as issued covers discharge limitations, monitoring, and reporting requirements. Failure to meet any portion of the Permit could result in civil and/or criminal penalties. The Illinois Environmental Protection Agency is ready and willing to assist you in interpreting any of the conditions of the Permit as they relate specifically to your discharge

Pursuant to the Final NPDES Electronic Reporting Rule, all permittees must report DMRs electronically unless a waiver has been granted by the Agency. The Agency utilizes NetDMR, a web based application, which allows the submittal of electronic Discharge Monitoring Reports instead of paper Discharge Monitoring Reports (DMRs). More information regarding NetDMR can be found on the Agency website, https://www2.illinois.gov/epa/topics/water-quality/surface-water/netdmr/Pages/quick-answer-guide.aspx. If your facility has received a waiver from the NetDMR program, a supply of preprinted paper DMR Forms will be sent to your facility during the interim period prior to your registration in the NetDMR program. Additional information and instructions will accompany the preprinted DMRs. Please see the attachment regarding the electronic reporting rule.

The attached Permit is effective as of the date indicated on the first page of the Permit. Until the effective date of any re-issued Permit, the limitations and conditions of the previously-issued Permit remain in full effect. You have the right to appeal any condition of the Permit to the Illinois Pollution Control Board within a 35 day period following the issuance date.

Should you have questions concerning the Permit, please contact Mark E. Liska at 217/782-0610.

Sincerely,

Darin E. LeCrone, P.E.
Manager, Industrial Unit, Permit Section
Division of Water Pollution Control

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Attachment: Final Permit

cc: Records
Compliance Assurance Section
Collinsville Region
Billing
USEPA

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: January 31, 2026

Issue Date: January 28, 2021
Effective Date: February 01, 2021

Name and Address of Permittee:

United States Steel Corporation
Granite City Works
1951 State Street
Granite City, Illinois 62040

Facility Name and Address:

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

Discharge Number and Name:

		Receiving Waters:
001	Treated Process Wastewater	Horseshoe Lake
B01	Cold Rolling Mill Wastewater	Internal Outfall
C01	Landfill Leachate Wastewater	Internal Outfall

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.

Darin E. LeCrone, P.E.
Manager, Industrial Unit, Permit Section
Division of Water Pollution Control

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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 – (DAF = 25.0 MGD)
Treated Process Wastewater consists of wastewater from the blast furnace, basic oxygen furnace, 80" hot strip mill, landfill leachates, galvanizing lines, sanitary, stormwater runoff, continuous casters, boiler blowdown, maintenance shops, laboratories, cold mill, continuous pickler, and miscellaneous flows

	LOAD LIMITS lbs/day DAF (DMF)		CONCENTRATION LIMITS mg/l			
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM	SAMPLE FREQUENCY	SAMPLE TYPE
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	1/Week	Composite
Total Suspended Solids	2502	5004	12	24	1/Week	Composite
Oil & Grease	1511	3492	15	30	1/Week	Grab
Iron (total)	417	834	2	4	1/Month	Composite
Iron (dissolved)		209		1	1/Month	Composite
Lead (total)	5.3	16	0.09	0.4	1/Quarter	Composite
Zinc (total)	12	33	0.17	0.96	2/Week	Composite
Cyanide (total)	19	35	0.1	0.2	2/Month	Composite
Cyanide (available by OIA 1677)	1.1	4.6	0.0052	0.022	2/Month	Composite
Phenol (4AAP)	5.0	10		0.1	1/Week	Composite
Fluoride		834		4	1/Week	Composite
Ammonia-Nitrogen*						
Spring/Fall	521	2585	2.5	12.4	1/Week	Composite
Summer	479	3128	2.3	15.0	1/Week	Composite
Winter	834	1188	4.0	5.7	1/Week	Composite
March	688	1188	3.3	5.7	1/Week	Composite
Phosphorus				Monitor Only	1/Quarter	Grab

*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 6.2 mg/L (1292 lb/day). Summer weekly average limit is 5.7 mg/L (1188 lb/day). There is no weekly average limit for Winter or March.

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): B01, C01

	LOAD LIMITS lbs/day DAF (DMF)		CONCENTRATION LIMITS mg/l			
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM	SAMPLE FREQUENCY	SAMPLE TYPE
Outfall: B01 - Cold Rolling Mill Wastewater						
Flow (MGD)	See Special Condition 1				When Monitoring	Measure
Tetrachloroethylene		1.1			2/Year	Grab
Naphthalene		0.69			1/Quarter	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:

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

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) electronic forms using one such form for each outfall each month.

In the event that an outfall does not discharge during a monthly reporting period, the DMR Form shall be submitted with no discharge indicated.

The Permittee is required to submit electronic DMRs (NetDMRs) instead of mailing paper DMRs to the IEPA unless a waiver has been granted by the Agency. More information, including registration information for the NetDMR program, can be obtained on the IEPA website, https://www2.illinois.gov/epa/topics/water-quality/surface-water/netdmr/Pages/quick-answer-guide.aspx.

The completed Discharge Monitoring Report forms shall be submitted to IEPA no later than the 25th day of the following month, unless otherwise specified by the permitting authority.

Permittees that have been granted a waiver shall mail Discharge Monitoring Reports with an original signature to the IEPA at the following address:

Illinois Environmental Protection Agency
Division of Water Pollution Control
Attention: Compliance Assurance Section, Mail Code # 19
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

NPDES Permit No. IL0000329

Special Conditions

SPECIAL CONDITION 8. 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 9. The Agency has determined that the effluent limitations in this permit constitute BAT/BCT for storm water which is treated in the existing treatment facilities for purposes of this permit reissuance, and no pollution prevention plan will be required for such storm water. In addition to the chemical specific monitoring required elsewhere in this permit, the permittee shall conduct an annual inspection of the facility site to identify areas contributing to a storm water discharge associated with industrial activity, and determine whether any facility modifications have occurred which result in previously-treated storm water discharges no longer receiving treatment. If any such discharges are identified the permittee shall request a modification of this permit within 30 days after the inspection. Records of the annual inspection shall be retained by the permittee for the term of this permit and be made available to the Agency on request.

SPECIAL CONDITION 10. The Permittee shall monitor the effluent from Outfall 001 for the following parameters on a 2/year basis. This Permit may be modified with public notice to establish effluent limitations if appropriate, based on information obtained through sampling. The sample shall be a 24-hour effluent composite except as otherwise specifically provided below and the results shall be submitted on the DMR's to IEPA. The parameters to be sampled and the minimum reporting limits to be attained are as follows:

STORET CODE	PARAMETER	Minimum reporting limit
10197	Antimony	5.0 ug/L
01002	Arsenic	0.05 mg/L
01007	Barium	0.5 mg/L
01027	Cadmium	0.001 mg/L
01032	Chromium (Hexavalent) (grab)	0.01 mg/L
01034	Chromium (total)	0.05 mg/L
01042	Copper	0.005 mg/L
01055	Manganese	0.5 mg/L
71900	Mercury	0.2 ug/L
01067	Nickel	0.005 mg/L
01147	Selenium	0.005 mg/L
01077	Silver (total)	0.003 mg/L

Unless otherwise indicated, concentrations refer to the total amount of the constituent present in all phases, whether solid, suspended or dissolved, elemental or combined, including all oxidation states.

The analyses for the above parameters shall meet the detection limits as established for accepted test procedures listed in 40 CFR 136.

All samples for mercury must be analyzed by EPA Method 1631E using the digestion procedure described in Section 11.1.1.2 of 1631E, which dictates that samples must be heated at 50°C for 6 hours in a bromine chloride (BrCl) solution in closed vessels.

SPECIAL CONDITION 11: This Permit may be modified to include alternative or additional final effluent limitations pursuant to an approved Total Maximum Daily Load (TMDL) Study or upon approval of an alternate Water Quality Study.

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Attachment H

Standard Conditions

Definitions

Act means the Illinois Environmental Protection Act, 415 ILCS 5 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 measurements, 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 requirements.

(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 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 and 40 CFR 122.63. 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 or USEPA (including an authorized contractor acting as a representative of the Agency or USEPA), 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

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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. Records related to the permittee's sewage sludge use and disposal activities shall be retained for a period of at least five years (or longer as required by 40 CFR Part 503). This period may be extended by request of the Agency or USEPA 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.
(c) **Changes of Authorization.** If an authorization under (b) is no longer 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.
(d) **Certification.** Any person signing a document under paragraph (a) or (b) of this section shall make the following certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

(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.
Notice is required when:
(1) The alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source pursuant to 40 CFR 122.29 (b); or
(2) The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification applies to pollutants which are subject neither to effluent limitations in the permit, nor to notification requirements pursuant to 40 CFR 122.42 (a)(1).
(3) The alteration or addition results in a significant change in the permittee's sludge use or disposal practices, and such alteration, addition, or change may justify the application of permit conditions that are different from or absent in the existing permit, including notification of additional use or disposal sites not reported during the permit application process or not reported pursuant to an approved land application plan.
(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) **Transfers.** This permit is not transferable to any person except after notice to the Agency.
(d) **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.
(e) **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.

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(f) **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 time; 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 reoccurrence 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) Any upset which exceeds any effluent limitation in the permit.

(3) Violation of a maximum daily discharge limitation for any of the pollutants listed by the Agency in the permit or any pollutant which may endanger health or the environment.

The Agency may waive the written report on a case-by-case basis if the oral report has been received within 24-hours.

(g) **Other noncompliance.** The permittee shall report all instances of noncompliance not reported under paragraphs (12) (d), (e), or (f), at the time monitoring reports are submitted. The reports shall contain the information listed in paragraph (12) (f).

(h) **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) **Bypass.**

(a) Definitions.

(1) Bypass means the intentional diversion of waste streams from any portion of a treatment facility.

(2) Severe property damage means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

(b) Bypass not exceeding limitations. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of paragraphs (13)(c) and (13)(d).

(c) Notice.

(1) Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least ten days before the date of the bypass.

(2) Unanticipated bypass. The permittee shall submit notice of an unanticipated bypass as required in paragraph (12)(f) (24-hour notice).

(d) Prohibition of bypass.

(1) Bypass is prohibited, and the Agency may take enforcement action against a permittee for bypass, unless:

(i) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

(ii) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and

(iii) The permittee submitted notices as required under paragraph (13)(c).

(2) The Agency may approve an anticipated bypass, after considering its adverse effects, if the Agency determines that it will meet the three conditions listed above in paragraph (13)(d)(1).

(14) **Upset.**

(a) Definition. Upset means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

(b) Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with such technology based permit effluent limitations if the requirements of paragraph (14)(c) are met. No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review.

(c) Conditions necessary for a demonstration of upset. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An upset occurred and that the permittee can identify the cause(s) of the upset;

(2) The permitted facility was at the time being properly operated; and

(3) The permittee submitted notice of the upset as required in paragraph (12)(f)(2) (24-hour notice).

(4) The permittee complied with any remedial measures required under paragraph (4).

(d) Burden of proof. In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof.

(15) **Transfer of permits.** Permits may be transferred by modification or automatic transfer as described below:

(a) Transfers by modification. Except as provided in paragraph (b), a permit may be transferred by the permittee to a new owner or operator only if the permit has been modified or revoked and reissued pursuant to 40 CFR 122.62 (b) (2), or a minor modification made pursuant to 40 CFR 122.63 (d), to identify the new permittee and incorporate such other requirements as may be necessary under the Clean Water Act.

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(b) Automatic transfers. As an alternative to transfers under paragraph (a), any NPDES permit may be automatically transferred to a new permittee if:
(1) The current permittee notifies the Agency at least 30 days in advance of the proposed transfer date;
(2) The notice includes a written agreement between the existing and new permittees containing a specified date for transfer of permit responsibility, coverage and liability between the existing and new permittees; and
(3) 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.

(16) 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);
(2) Two hundred micrograms per liter (200 ug/l) for acrolein and 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.
(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.

(17) 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 discharge 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.

(18) 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:
(a) User charges pursuant to Section 204 (b) of the Clean Water Act, and applicable regulations appearing in 40 CFR 35;
(b) Toxic pollutant effluent standards and pretreatment standards pursuant to Section 307 of the Clean Water Act; and
(c) Inspection, monitoring and entry pursuant to Section 308 of the Clean Water Act.

(19) 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 reissued to conform to that effluent standard or limitation.

(20) 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.

(21) 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.

(22) The Clean Water Act provides that any person who violates a permit condition implementing Sections 301, 302, 306, 307, 308, 318, or 405 of the Clean Water Act is subject to a civil penalty not to exceed $25,000 per day of such violation. Any person who willfully or negligently violates permit conditions implementing Sections 301, 302, 306, 307, 308, 318 or 405 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.
Additional penalties for violating these sections of the Clean Water Act are identified in 40 CFR 122.41 (a)(2) and (3).

(23) 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 this permit shall, upon conviction, be punished by a fine of not more than $10,000, or by imprisonment for not more than 2 years, or both. If a conviction of a person is for a violation committed after a first conviction of such person under this paragraph, punishment is a fine of not more than $20,000 per day of violation, or by imprisonment of not more than 4 years, or both.

(24) 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, 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.

(25) Collected screening, slurries, 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.

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

(27) 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 or any court with jurisdiction.

(28) 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.

EXHIBIT B

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

July 31, 2025

Illinois Environmental Protection Agency
Industrial Permits Unit, Bureau of Water
2520 West Iles Avenue
P.O. Box 19276
Springfield, IL 62794-9276

USPS Ground Advantage

Dear Sir or Madam:

Re: U. S. Steel Corporation – Granite City Works
NPDES Permit Renewal Application; NPDES Permit No. IL0000329

Please find enclosed a timely NPDES permit renewal application for the U. S. Steel Granite City Works. Please refer to the "Application Narrative" in the attached document for a discussion of site-specific topics related to the renewal NPDES permit.

If you have any questions or require additional information, please contact Jake Springman at 618-451-3459 or JSpringman@uss.com.

Thank you,

Krista Armentrout
Manager – Environmental
U. S. Steel Corporation – Granite City Works
618-451-3013
KDArmentrout@uss.com

Attachment

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United States Steel Corporation
Granite City Works

NPDES Permit Renewal Application
NPDES Permit No. IL0000329

July 2025

Prepared For

U. S. Steel Corporation
Granite City Works

Prepared By

Amendola Engineering, Inc.
Lakewood, Ohio

U. S. Steel Corporation – Granite City Works
NPDES Permit Renewal Application

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United States Steel Corporation Granite City Works
NPDES Pemit Renewal Application – July 2025
Application Narrative

Please refer to the information below regarding renewal of the NPDES permit for the U. S. Steel Granite City Works (GCW).

Granite City Works Operations

Blast Furnace A was indefinitely idled in March 2020. Blast Furnace B, BOP Steelmaking and the Continuous Casters were indefinitely idled September 2023 (i.e. the remaining "hot end" operations were indefinitely idled in September 2023). U. S. Steel is requesting to retain authorization for discharge from all operations, including the indefinitely idled operations listed above, in the renewal NPDES permit.

The Form 2C data tables contain data summaries from January 2024 to May 2025, reflective of operations with the hot end idle. "Attachment 2C" contains monitoring data summaries from January 2021 to September 2023, reflective of the facility with operation of the "hot end" operations.

CWA Section 301(g) Variance for Ammonia-N and Total Phenols (4AAP)

U. S. Steel requests that the existing 301(g) modified effluent limits at Outfall 001 for ammonia-N and total phenols (4AAP) be continued in the renewal NPDES permit consistent with the request to retain authorization for blast furnace discharges.

Cooling Water Intake Structure – 316(b)

40 CFR Part 125 Subpart J apples to existing facilities in which the facility is a point source, has one or more cooling water intake structures with a cumulative design intake flow of greater than 2 mgd from waters of the United States, and 25% or more of the water the facility withdraws on an actual intake flow basis is used exclusively for cooling purposes.

The sources of water used at GCW are the Chain of Rocks Canal, well water, purchased city water, stormwater and recycled process wastewater. All water is combined and recycled multiple times for both cooling and process purposes. Since none of the water being drawn from the waters of the United States is being used exclusively for cooling purposes as required by 40 CFR Part 125.92, 316(b) regulations do not apply. U.S. Steel agrees with IEPA's previous determinations that the discharge is not subject to 316(b) regulations.

Central Treatment Facility Exemption

U. S. Steel requests that the Central Treatment Facility exemption under 40 CFR Part 420.01 (b) be maintained. The GCW facility was previously owned and operated by National Steel, which is listed to be "temporarily excluded from the provisions of this part" if the owner or operator of the facility

provided the information on or before July 26, 1982. Information was submitted on July 22, 1982 and therefore the facility qualifies for the Central Treatment Exemption and is thus eligible for alternative effluent limitations instead of those listed in Part 420 -Iron and Steel Manufacturing. Effluent limitations should continue to be based on the current system's ability to treat.

Zinc Background Credits

U. S. Steel requests that Special Condition 6 remain in the permit. This condition allows the application of background credits for intake waters to demonstrate that an apparent noncompliance of load limits for total zinc is not a violation.

Stormwater

All stormwater that precipitates onto the property is ultimately discharged through Outfall 001. The GCW property has grading and a network of conveyances designed to direct the stormwater to the lagoons for treatment and recirculation back through the plant multiple times prior to final treatment and discharge through Outfall 001. There have been no changes to the stormwater drainage or increased pollutant loading, therefore, BAT/BCT for stormwater is met with the existing effluent limitations as noted in the previous Fact Sheet.

EPA Identification Number	NPDES Permit Number	Facility Name	OMB No. 2040-0004 Expires 07/31/2026
IRL000121665	IL0000329	U. S. Steel - Granite City Works	

Form 1 NPDES

EPA

U.S. Environmental Protection Agency
Application for NPDES Permit to Discharge Wastewater

GENERAL INFORMATION

SECTION 1. ACTIVITIES REQUIRING AN NPDES PERMIT (40 CFR 122.21(F) AND (F)(1))

Activities Requiring an NPDES Permit

1.1 Applicants *Not Required* to Submit Form 1

1.1.1	Is the facility a new or existing publicly owned treatment works or has your permitting authority directed you to submit Form 2A? If yes, STOP. Do NOT complete Form 1. Complete Form 2A. If the facility is also a treatment works treating domestic sewage, you must also complete Form 2S. ☑ No	1.1.2	Is the facility a sludge-only facility (i.e., a facility that does not discharge wastewater to surface waters)? If yes, STOP. Do NOT complete Form 1. Complete Form 2S. ☑ No

1.2 Applicants *Required* to Submit Form 1

1.2.1	Is the facility a concentrated animal feeding operation or a concentrated aquatic animal production facility? ☐ Yes → Complete Form 1 ***and*** Form 2B. ☑ No	1.2.2	Is the facility an **existing** manufacturing, commercial, mining, or silvicultural **facility** that **is currently discharging process wastewater**? ☑ Yes → Complete Form 1 ***and*** Form 2C. ☐ No
1.2.3	Is the facility a **new** manufacturing, commercial, mining, or silvicultural **facility** that has **not yet commenced to discharge**? ☐ Yes → Complete Form 1 ***and*** Form 2D. ☑ No	1.2.4	Is the facility a **new or existing** manufacturing, commercial, mining, or silvicultural **facility** that **discharges only nonprocess wastewater**? ☐ Yes → Complete Form 1 ***and*** Form 2E. ☑ No
1.2.5	Is the facility a **new or existing facility** whose discharge is composed entirely of **stormwater associated with industrial activity** or whose discharge is composed of **both stormwater and non-stormwater**? ☑ Yes → Complete Form 1 ***and*** Form 2F unless exempted by 40 CFR 122.26(b)(14)(x) or (b)(15). ☐ No	1.2.6	Is the facility a new or existing **treatment works treating domestic sewage** that discharges wastewater to surface waters? ☐ Yes → Complete Form 1, Form 2S, ***and*** any other applicable forms, as directed by your permitting authority. ☑ No

SECTION 2. NAME, MAILING ADDRESS, AND LOCATION (40 CFR 122.21(F)(2))

Name, Mailing Address, and Location

2.1 Facility Name

United States Steel Corporation - Granite City Works

2.2 EPA Identification Number

ILR000121665

2.3 Facility Contact

Name (first and last)	Title	Phone number
Krista Armentrout	Environmental Manager	(618) 451-3013

Email address

kdarmentrout@uss.com

EPA Identification Number	NPDES Permit Number	Facility Name	OMB No. 2040-0004 Expires 07/31/2026
IRL000121665	IL0000329	U. S. Steel - Granite City Works	

Name, Mailing Address, and Location Continued

2.4 Facility Mailing Address

Street or P.O. box		
1951 State Street		
City or town: Granite City	State: IL	ZIP code: 62040

2.5 Facility Location

Street, route number, or other specific identifier		
1951 State Street		
County name: Madison	County code (if known):	
City or town: Granite City	State: IL	ZIP code: 62040

SECTION 3. SIC AND NAICS CODES (40 CFR 122.21(F)(3))

SIC and NAICS Codes

3.1

SIC Code(s)	Description (optional)
3312	Steel Works, Blast Furnaces and Rolling Mills
3316	Cold rolled steel sheet, strip, bars

3.2

NAICS Code(s)	Description (optional)
3311110	Iron and Steel Mills and Ferroalloy Manufacturing

SECTION 4. OPERATOR INFORMATION (40 CFR 122.21(F)(4))

Operator Information

4.1 Name of Operator

United States Steel Corporation - Granite City Works

4.2 Is the name you listed in Item 4.1 also the owner?

☑ Yes ☐ No

4.3 Operator Status

☐ Public—federal ☐ Public—state ☐ Other public (specify)_____

☑ Private ☐ Other (specify) _____

4.4 Phone Number of Operator

(618) 451-3013

EPA Identification Number	NPDES Permit Number	Facility Name	OMB No. 2040-0004 Expires 07/31/2026
IRL000121665	IL0000329	U. S. Steel - Granite City Works	

Operator Information Continued

4.5 **Operator Address**

Street or P.O. Box: 1951 State Street

City or town	State	ZIP code
Granite City	IL	62040

Email address of operator: kdarmentrout@uss.com

SECTION 5. INDIAN LAND (40 CFR 122.21(F)(5))

Indian Land

5.1 Is the facility located on Indian Land?

☐ Yes ☑ No

SECTION 6. EXISTING ENVIRONMENTAL PERMITS (40 CFR 122.21(F)(6))

Existing Environmental Permits

6.1 **Existing Environmental Permits** (check all that apply and print or type the corresponding permit number for each)

☑ NPDES (discharges to surface water) IL0000329	☐ RCRA (hazardous wastes)	☐ UIC (underground injection of fluids)
☑ PSD (air emissions) 95010001	☐ Nonattainment program (CAA)	☐ NESHAPs (CAA)
☐ Ocean dumping (MPRSA)	☐ Dredge or fill (CWA Section 404)	☑ Other (specify) Title V App No. 96030056

SECTION 7. MAP (40 CFR 122.21(F)(7))

Map

7.1 Have you attached a topographic map containing all required information to this application? (See instructions for specific requirements.)

☑ Yes ☐ CAFO—Not Applicable (See requirements in Form 2B.)

SECTION 8. NATURE OF BUSINESS (40 CFR 122.21(F)(8))

Nature of Business

8.1 Describe the nature of your business.

Integrated steel mill with operations consisting of blast furnace iron making, basic oxygen furnace steelmaking, ladle metallurgy, continuous casting, a hot strip mill, pickling, cold rolling and galvanizing.

SECTION 9. COOLING WATER INTAKE STRUCTURES (40 CFR 122.21(F)(9))

Cooling Water Intake Structures

9.1 Does your facility use cooling water?

☑ Yes ☐ No ➔ SKIP to Item 10.1.

9.2 Identify the source of cooling water. (Note that facilities that use a cooling water intake structure as described at 40 CFR 125, Subparts I and J may have additional application requirements at 40 CFR 122.21(r). Consult with your NPDES permitting authority to determine what specific information needs to be submitted and when.)

The sources of water are the Chain of Rocks Canal, well water, purchased city water, stormwater and recycled process wastewater. All water is combined and recycled multiple times for both cooling and process purposes. Since none of the water being drawn from waters of the United States is being used exclusively for cooling purposes,

Note: Please refer to Application Narrative page 1 for Item 9.2 (CWIS) as the form here is cut-off.

EPA Identification Number	NPDES Permit Number	Facility Name	OMB No. 2040-0004 Expires 07/31/2026
IRL000121665	IL0000329	U. S. Steel - Granite City Works	

SECTION 10. VARIANCE REQUESTS (40 CFR 122.21(F)(10))

Variance Requests

10.1 Do you intend to request or renew one or more of the variances authorized at 40 CFR 122.21(m)? (Check all that apply. Consult with your NPDES permitting authority to determine what information needs to be submitted and when.)

- ☐ Fundamentally different factors (CWA Section 301(n))
- ☐ Water quality related effluent limitations (CWA Section 302(b)(2))
- ☑ Non-conventional pollutants (CWA Section 301(c) and (g))
- ☐ Thermal discharges (CWA Section 316(a))
- ☐ Not applicable

SECTION 11. CHECKLIST AND CERTIFICATION STATEMENT (40 CFR 122.22(A) AND (D))

Checklist and Certification Statement

11.1 In Column 1 below, mark the sections of Form 1 that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing to alert the permitting authority. Note that not all applicants are required to provide attachments.

Column 1	Column 2
☑ Section 1: Activities Requiring an NPDES Permit	☐ w/ attachments
☑ Section 2: Name, Mailing Address, and Location	☐ w/ attachments
☑ Section 3: SIC Codes	☐ w/ attachments
☑ Section 4: Operator Information	☐ w/ attachments
☑ Section 5: Indian Land	☐ w/ attachments
☑ Section 6: Existing Environmental Permits	☐ w/ attachments
☑ Section 7: Map	☑ w/ topographic map ☐ w/ additional attachments
☑ Section 8: Nature of Business	☐ w/ attachments
☑ Section 9: Cooling Water Intake Structures	☐ w/ attachments
☑ Section 10.: Variance Requests	☐ w/ attachments
☑ Section 11: Checklist and Certification Statement	☐ w/ attachments

11.2 Provide the following certification. (See instructions to determine the appropriate person to sign the application.)

Certification Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name (print or type first and last name)	Official title
Michael Patton	General Manager
Signature: Michael E Patton	Date signed: 7-30-25

EPA Identification Number	NPDES Permit Number	Facility Name
ILR000121665	IL0000329	USS Granite City Works

OMB No. 2040-0004
Expires 07/31/2026

Form 2C NPDES

EPA

U.S. Environmental Protection Agency
Application for NPDES Permit to Discharge Wastewater
EXISTING MANUFACTURING, COMMERCIAL, MINING, AND SILVICULTURE OPERATIONS

SECTION 1. OUTFALL LOCATION (40 CFR 122.21(G)(1))

Outfall Location

1.1 Provide information on each of the facility's outfalls in the table below.

Outfall Number	Receiving Water Name	Latitude	Longitude
001	Horseshoe Lake	38 deg 41 min 31sec	90 deg 41 min 31sec
B01	No direct discharge	NA	NA
C01	No direct discharge	NA	NA

SECTION 2. LINE DRAWING (40 CFR 122.21(G)(2))

Line Drawing

2.1 Have you attached a line drawing to this application that shows the water flow through your facility with a water balance? (See instructions for drawing requirements. See Exhibit 2C–1 at end of instructions for example.)

☑ Yes

SECTION 3. AVERAGE FLOWS AND TREATMENT (40 CFR 122.21(G)(3))

Average Flows and Treatment

3.1 For each outfall identified under Item 1.1, provide average flow and treatment information. Add additional sheets if necessary.

****Outfall Number**** 001

Operations Contributing to Flow

Operation	Average Flow
See Attachment 3.1	mgd
	mgd
	mgd
	mgd

Treatment Units

Description (include size, flow rate through each treatment unit, retention time, etc.)	Code from Exhibit 2C–2	Final Disposal of Solid or Liquid Wastes Other Than by Discharge
See Attachment 3.1		

EPA Identification Number	NPDES Permit Number	Facility Name	OMB No. 2040-0004 Expires 07/31/2026
ILR000121665	IL0000329	USS Granite City Works	

Average Flows and Treatment Continued

3.1 cont.

****Outfall Number**** B01

Operations Contributing to Flow

Operation	Average Flow
See Attachment 3.1	mgd
	mgd
	mgd
	mgd

Treatment Units

Description (include size, flow rate through each treatment unit, retention time, etc.)	Code from Exhibit 2C–2	Final Disposal of Solid or Liquid Wastes Other Than by Discharge
See Attachment 3.1		

****Outfall Number**** _____

Operations Contributing to Flow

Operation	Average Flow
	mgd
	mgd
	mgd
	mgd

Treatment Units

Description (include size, flow rate through each treatment unit, retention time, etc.)	Code from Exhibit 2C–2	Final Disposal of Solid or Liquid Wastes Other Than by Discharge

System Users

3.2 Are you applying for an NPDES permit to operate a privately owned treatment works?

☐ Yes ☑ No → SKIP to Section 4.

3.3 Have you attached a list that identifies each user of the treatment works?

☐ Yes

EPA Identification Number	NPDES Permit Number	Facility Name
ILR000121665	IL0000329	USS Granite City Works

OMB No. 2040-0004
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SECTION 4. INTERMITTENT FLOWS (40 CFR 122.21(G)(4))

Intermittent Flows

4.1 Except for storm runoff, leaks, or spills, are any discharges described in Sections 1 and 3 intermittent or seasonal?

☐ Yes ☑ No ➔ SKIP to Section 5.

4.2 Provide information on intermittent or seasonal flows for each applicable outfall. Attach additional pages, if necessary.

Outfall Number	Operation (list)	Frequency		Flow Rate		Duration
		Average Days/Week	Average Months/Year	Long-Term Average	Maximum Daily	
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days

SECTION 5. PRODUCTION (40 CFR 122.21(G)(5))

Applicable ELGs

5.1 Do any effluent limitation guidelines (ELGs) promulgated by EPA under Section 304 of the CWA apply to your facility?

☑ Yes ☐ No ➔ SKIP to Section 6.

5.2 Provide the following information on applicable ELGs.

ELG Category	ELG Subcategory	Regulatory Citation
See Attachment 5.2		

Production-Based Limitations

5.3 Are any of the applicable ELGs expressed in terms of production (or other measure of operation)?

☑ Yes ☐ No ➔ SKIP to Section 6.

5.4 Provide an actual measure of daily production expressed in terms and units of applicable ELGs.

Outfall Number	Operation, Product, or Material	Quantity per Day	Unit of Measure
	See Attachment 5.4		

EPA Identification Number	NPDES Permit Number	Facility Name	OMB No. 2040-0004 Expires 07/31/2026
ILR000121665	IL0000329	USS Granite City Works	

5.5 Are you requesting alternative limits based on an anticipated increase in the actual production during the next permit term? (Consult with your NPDES permitting authority to determine what information needs to be submitted and when.)

☐ Yes ☑ No

SECTION 6. IMPROVEMENTS (40 CFR 122.21(G)(6))

Upgrades and Improvements

6.1 Are you presently required by any federal, state, or local authority to meet an implementation schedule for constructing, upgrading, or operating wastewater treatment equipment or practices or any other environmental programs that could affect the discharges described in this application?

☐ Yes ☑ No ➔ SKIP to Item 6.3.

6.2 Briefly identify each applicable project in the table below.

Brief Identification and Description of Project	Affected Outfalls (list outfall number)	Source(s) of Discharge	Final Compliance Dates	
			Required	Projected

6.3 Have you attached sheets describing any additional water pollution control programs (or other environmental projects that may affect your discharges) that you now have underway or planned? *(optional item)*

☐ Yes ☐ No ☑ Not applicable

SECTION 7. EFFLUENT AND INTAKE CHARACTERISTICS (40 CFR 122.21(G)(7))

Effluent and Intake Characteristics

See the instructions to determine the pollutants and parameters you are required to monitor and, in turn, the tables you must complete. Not all applicants need to complete each table.

Table A. Conventional and Non-Conventional Pollutants

7.1 Are you requesting a waiver from your NPDES permitting authority for any Table A pollutants for any of your outfalls?

☐ Yes ☑ No ➔ SKIP to Item 7.3.

7.2 If yes, indicate the applicable outfalls below or check the appropriate box to indicate that you are requesting a waiver for all outfalls. Attach waiver request and other required information to the application.

Outfall number _____ Outfall number _____ Outfall number _____

☐ I am requesting a waiver for some pollutants at all outfalls.

☐ I am requesting a waiver for all pollutants at all outfalls ➔ SKIP to Item 7.4.

7.3 Have you completed monitoring for all Table A pollutants at each of your outfalls for which a waiver has not been requested and attached the results to this application package?

☑ Yes

Table B. Toxic Metals, Cyanide, Total Phenols, and Organic Toxic Pollutants

7.4 Do any of the facility's processes that contribute wastewater fall into one or more of the primary industry categories listed in Exhibit 2C–3? (See end of instructions for exhibit.)

☑ Yes ☐ No ➔ SKIP to Item 7.8.

7.5 Have you checked "Testing Required" for all toxic metals, cyanide, and total phenols in Section 1 of Table B?

☑ Yes

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Effluent and Intake Characteristics Continued

7.6 List the applicable primary industry categories and check the boxes indicating the required GC/MS fraction(s) identified in Exhibit 2C–3.

Primary Industry Category	Required GC/MS Fraction(s) (check applicable boxes)
Iron and Steel Mills	☑ Volatile ☑ Acid ☑ Base/neutral ☐ Pesticide
	☐ Volatile ☐ Acid ☐ Base/neutral ☐ Pesticide
	☐ Volatile ☐ Acid ☐ Base/neutral ☐ Pesticide

7.7 Have you checked "Testing Required" for all required pollutants in Sections 2 through 5 of Table B for each of the GC/MS fractions checked in Item 7.6?

☑ Yes

7.8 Have you checked "Believed Present" or "Believed Absent" for all pollutants listed in Sections 1 through 5 of Table B where testing is not required?

☑ Yes

7.9 Have you provided (1) quantitative data for those Section 1, Table B, pollutants for which you have indicated testing is required or (2) quantitative data or other required information for those Section 1, Table B, pollutants that you have indicated are "Believed Present" in your discharge?

☑ Yes

7.10 Does the applicant qualify for a small business exemption under the criteria specified in the instructions?

☐ Yes ➔ Note that you qualify at the top of Table B, then SKIP to Item 7.12. ☑ No

7.11 Have you provided (1) quantitative data for those Sections 2 through 5, Table B, pollutants for which you have determined testing is required or (2) quantitative data or an explanation for those Sections 2 through 5, Table B, pollutants you have indicated are "Believed Present" in your discharge?

☑ Yes

Table C. Certain Conventional and Non-Conventional Pollutants

7.12 Have you indicated whether pollutants are "Believed Present" or "Believed Absent" for all pollutants listed in Table C for all outfalls?

☑ Yes

7.13 Have you completed Table C by providing quantitative data for those pollutants that are limited either directly or indirectly in an ELG? You must provide quantitative data even if the pollutant is "Believed Absent."

☑ Yes ☐ Not applicable

7.14 Have you completed Table C by providing quantitative data or an explanation for those pollutants for which you have indicated "Believed Present"?

☑ Yes

Table D. Certain Hazardous Substances and Asbestos

7.15 Have you indicated whether pollutants are "Believed Present" or "Believed Absent" for all pollutants listed in Table D for all outfalls?

☑ Yes

7.16 Have you completed Table D by (1) describing the reasons the applicable pollutants are expected to be discharged and (2) providing quantitative data, if available?

☑ Yes ☐ No

Table E. 2,3,7,8-Tetrachlorodibenzo-p-Dioxin (2,3,7,8-TCDD)

7.17 Does the facility use or manufacture one or more of the 2,3,7,8-TCDD congeners listed in the instructions, or do you know or have reason to believe that TCDD is or may be present in the effluent?

☐ Yes ➔ Complete Table E. ☑ No ➔ SKIP to Section 8.

7.18 Have you completed Table E by reporting *qualitative* data for TCDD?

☑ Yes

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SECTION 8. USED OR MANUFACTURED TOXICS (40 CFR 122.21(G)(9))

Used or Manufactured Toxics

8.1 Is any pollutant listed in Table B a substance or a component of a substance used or manufactured at your facility as an intermediate or final product or byproduct?

☑ Yes ☐ No ➔ SKIP to Section 9.

8.2 List the pollutants below. Attach additional sheets, if necessary.

1. Zinc	4.	7.
2. Chromium	5.	8.
3.	6.	9.

SECTION 9. BIOLOGICAL TOXICITY TESTS (40 CFR 122.21(G)(11))

Biological Toxicity Tests

9.1 Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made within the last three years on (1) any of your discharges or (2) a receiving water in relation to your discharge?

☐ Yes ☑ No ➔ SKIP to Section 10.

9.2 Identify the tests and their purposes below.

Test(s)	Purpose of Test(s)	Submitted to NPDES Permitting Authority?	Date Submitted
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	

SECTION 10. CONTRACT ANALYSES (40 CFR 122.21(G)(12))

Contract Analyses

10.1 Were any of the analyses reported in Section 7 performed by a contract laboratory or consulting firm?

☑ Yes ☐ No ➔ SKIP to Section 11.

10.2 Provide information for each contract laboratory or consulting firm below.

	Laboratory Number 1	Laboratory Number 2	Laboratory Number 3
Name of laboratory/firm	ALS	Teklab, Inc.	
Laboratory address	3352 128th Avenue Holland, MI 49422	5445 Horseshoe Lake Rd. Collinsville, IL 62234	
Phone number	(616) 399-6070	(618) 344-1004	
Pollutant(s) analyzed	All except parameters under "Laboratory 2"	Fecal Coliform pH Temperature Sulfite Total Residual Chlorine	

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SECTION 11. ADDITIONAL INFORMATION (40 CFR 122.21(G)(13))

Additional Information

11.1 Has the NPDES permitting authority requested additional information?

☐ Yes ☑ No ➔ SKIP to Section 12.

11.2 List the information requested and attach it to this application.

1.	4.
2.	5.
3.	6.

SECTION 12. CHECKLIST AND CERTIFICATION STATEMENT (40 CFR 122.22(A) AND (D))

Checklist and Certification Statement

12.1 In Column 1 below, mark the sections of Form 2C that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing to alert the permitting authority. Note that not all applicants are required to complete all sections or provide attachments.

Column 1	Column 2
☑ Section 1: Outfall Location	☐ w/ attachments
☑ Section 2: Line Drawing	☑ w/ line drawing ☐ w/ additional attachments
☑ Section 3: Average Flows and Treatment	☑ w/ attachments ☐ w/ list of each user of privately owned treatment works
☑ Section 4: Intermittent Flows	☐ w/ attachments
☑ Section 5: Production	☑ w/ attachments
☑ Section 6: Improvements	☐ w/ attachments ☐ w/ optional additional sheets describing any additional pollution control plans
☑ Section 7: Effluent and Intake Characteristics	☐ w/ request for a waiver and supporting information ☐ w/ explanation for identical outfalls ☐ w/ small business exemption request ☐ w/ other attachments ☑ w/ Table A ☑ w/ Table B ☑ w/ Table C ☐ w/ Table D ☐ w/ Table E ☐ w/ analytical results as an attachment
☑ Section 8: Used or Manufactured Toxics	☐ w/ attachments
☑ Section 9: Biological Toxicity Tests	☐ w/ attachments
☑ Section 10: Contract Analyses	☐ w/ attachments
☑ Section 11: Additional Information	☐ w/ attachments
☑ Section 12: Checklist and Certification Statement	☐ w/ attachments

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SECTION 12. CHECKLIST AND CERTIFICATION STATEMENT (40 CFR 122.22(a) and (d)) (Continued)

Checklist and Certification Statement

12.2 Provide the following certification. (See instructions to determine the appropriate person to sign the application.)

Certification Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name (print or type first and last name)	Official title
Michael Patton	General Manager
Signature: Michael E Patton	Date signed: 7-30-25

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TABLE A. CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.21(g)(7)(iii))[1]

	Pollutant	Waiver Requested (if applicable)	Units (specify)		Effluent: Maximum Daily Discharge (required)	Effluent: Maximum Monthly Discharge (if available)	Effluent: Long-Term Average Daily Discharge (if available)	Effluent: Number of Analyses	Intake (optional): Long-Term Average Value	Intake (optional): Number of Analyses
☐	Check here if you have applied to your NPDES permitting authority for a waiver for *all* of the pollutants listed on this table for the noted outfall.									
1.	Biochemical oxygen demand (BOD_5)	☐	Concentration	mg/L	4.58			1		
			Mass	lb/day	344			1		
2.	Chemical oxygen demand (COD)	☐	Concentration	mg/L	12			1		
			Mass	lb/day	902			1		
3.	Total organic carbon (TOC)	☐	Concentration	mg/L	8.35			1		
			Mass	lb/day	628			1		
4.	Total suspended solids (TSS)	☐	Concentration	mg/L	17.2	9.72	6.22	75		
			Mass	lb/day	1440	868	540	75		
5.	Ammonia (as N)	☐	Concentration	mg/L	0.515	0.260	0.129	74		
			Mass	lb/day	35.9	19.9	10.6	74		
6.	Flow	☐	Rate	MGD	13.37	11.98	10.16	151		
7.	Temperature (winter)	☐	°C	°C	25			1		
	Temperature (summer)	☐	°C	°C						
8.	pH (minimum)	☐	Standard units	s.u.	6.6			346		
	pH (maximum)	☐	Standard units	s.u.	8.4			346		

[1] Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR Chapter I, Subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
☐	Check here if you qualify as a small business per the instructions to Form 2C and, therefore, do not need to submit quantitative data for any of the organic toxic pollutants in Sections 2 through 5 of this table. Note, however, that you must still indicate in the appropriate column of this table if you believe any of the pollutants listed are present in your discharge.											
Section 1. Toxic Metals, Cyanide, and Total Phenols												
1.1	Antimony, total (7440-36-0)	☑	☐	☐	Concentration	mg/L	0.000081			1		
					Mass	lb/day	0.000609			1		
1.2	Arsenic, total (7440-38-2)	☑	☐	☐	Concentration	mg/L	0.00158			1		
					Mass	lb/day	0.119			1		
1.3	Beryllium, total (7440-41-7)	☑	☐	☐	Concentration	mg/L	< 0.00013			1		
					Mass	lb/day	< 0.0098			1		
1.4	Cadmium, total (7440-43-9)	☑	☐	☐	Concentration	mg/L	< 0.00014			1		
					Mass	lb/day	< 0.01056			1		
1.5	Chromium, total (7440-47-3)	☑	☐	☐	Concentration	mg/L	0.00203			1		
					Mass	lb/day	0.1526			1		
1.6	Copper, total (7440-50-8)	☑	☐	☐	Concentration	mg/L	0.00268			1		
					Mass	lb/day	0.2015			1		
1.7	Lead, total (7439-92-1)	☑	☐	☐	Concentration	mg/L	0.0022	0.0022	0.0015	5		
					Mass	lb/day	0.183	0.183	0.128	5		
1.8	Mercury, total (7439-97-6)	☑	☐	☐	Concentration	ng/L	0.32			1		
					Mass	lb/day	0.000024			1		
1.9	Nickel, total (7440-02-0)	☑	☐	☐	Concentration	mg/L	0.00306			1		
					Mass	lb/day	0.2301			1		
1.10	Selenium, total (7782-49-2)	☑	☐	☐	Concentration	mg/L	0.00107			1		
					Mass	lb/day	0.0805			1		
1.11	Silver, total (7440-22-4)	☑	☐	☐	Concentration	mg/L	< 0.00026			1		
					Mass	lb/day	< 0.00196			1		

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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
1.12	Thallium, total (7440-28-0)	☑	☐	☐	Concentration	mg/L	< 0.00032			1		
					Mass	lb/day	< 0.02406			1		
1.13	Zinc, total (7440-66-6)	☑	☐	☐	Concentration	mg/L	0.054	0.012	0.0083	148		
					Mass	lb/day	4.20	1.12	0.72	148		
1.14	Cyanide, total (57-12-5)	☑	☐	☐	Concentration	mg/L	0.0039	0.0032	0.0027	34		
					Mass	lb/day	0.435	0.320	0.229	34		
1.15	Phenols, total	☑	☐	☐	Concentration	mg/L	0.007	0.005	0.0031	74		
					Mass	lb/day	0.554	0.345	0.263	74		
Section 2. Organic Toxic Pollutants (GC/MS Fraction—Volatile Compounds)												
2.1	Acrolein (107-02-8)	☑	☐	☐	Concentration	ug/L	< 7.34			1		
					Mass	lb/day	< 0.552			1		
2.2	Acrylonitrile (107-13-1)	☑	☐	☐	Concentration	ug/L	< 0.5			1		
					Mass	lb/day	< 0.038			1		
2.3	Benzene (71-43-2)	☑	☐	☐	Concentration	ug/L	< 0.46			1		
					Mass	lb/day	< 0.035			1		
2.4	Bromoform (75-25-2)	☑	☐	☐	Concentration	ug/L	< 0.56			1		
					Mass	lb/day	< 0.042			1		
2.5	Carbon tetrachloride (56-23-5)	☑	☐	☐	Concentration	ug/L	< 0.4			1		
					Mass	lb/day	< 0.030			1		
2.6	Chlorobenzene (108-90-7)	☑	☐	☐	Concentration	ug/L	< 0.4			1		
					Mass	lb/day	< 0.030			1		
2.7	Chlorodibromomethane (124-48-1)	☑	☐	☐	Concentration	ug/L	< 0.4			1		
					Mass	lb/day	< 0.030			1		
2.8	Chloroethane (75-00-3)	☑	☐	☐	Concentration	ug/L	< 0.68			1		
					Mass	lb/day	< 0.051			1		

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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
2.9	2-chloroethylvinyl ether (110-75-8)	☑	☐	☐	Concentration	ug/L	< 0.82			1		
					Mass	lb/day	< 0.062			1		
2.10	Chloroform (67-66-3)	☑	☐	☐	Concentration	ug/L	< 0.46			1		
					Mass	lb/day	< 0.035			1		
2.11	Dichlorobromomethane (75-27-4)	☑	☐	☐	Concentration	ug/L	< 0.49			1		
					Mass	lb/day	< 0.037			1		
2.12	1,1-dichloroethane (75-34-3)	☑	☐	☐	Concentration	ug/L	< 0.44			1		
					Mass	lb/day	< 0.033			1		
2.13	1,2-dichloroethane (107-06-2)	☑	☐	☐	Concentration	ug/L	< 0.44			1		
					Mass	lb/day	< 0.033			1		
2.14	1,1-dichloroethylene (75-35-4)	☑	☐	☐	Concentration	ug/L	< 0.40			1		
					Mass	lb/day	< 0.030			1		
2.15	1,2-dichloropropane (78-87-5)	☑	☐	☐	Concentration	ug/L	< 0.48			1		
					Mass	lb/day	< 0.036			1		
2.16	1,3-dichloropropylene (542-75-6)	☑	☐	☐	Concentration	ug/L	< 0.57			1		
					Mass	lb/day	< 0.043			1		
2.17	Ethylbenzene (100-41-4)	☑	☐	☐	Concentration	ug/L	< 0.34			1		
					Mass	lb/day	< 0.026			1		
2.18	Methyl bromide (74-83-9)	☑	☐	☐	Concentration	ug/L	< 0.9			1		
					Mass	lb/day	< 0.068			1		
2.19	Methyl chloride (74-87-3)	☑	☐	☐	Concentration	ug/L	< 0.83			1		
					Mass	lb/day	< 0.062			1		
2.20	Methylene chloride (75-09-2)	☑	☐	☐	Concentration	ug/L	< 0.86			1		
					Mass	lb/day	< 0.065			1		
2.21	1,1,2,2- tetrachloroethane (79-34-5)	☑	☐	☐	Concentration	ug/L	< 0.40			1		
					Mass	lb/day	< 0.030			1		

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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
2.22	Tetrachloroethylene (127-18-4)	☑	☐	☐	Concentration	ug/L	< 0.39			1		
					Mass	lb/day	< 0.029			1		
2.23	Toluene (108-88-3)	☑	☐	☐	Concentration	ug/L	< 0.45			1		
					Mass	lb/day	< 0.034			1		
2.24	1,2-trans-dichloroethylene (156-60-5)	☑	☐	☐	Concentration	ug/L	< 0.48			1		
					Mass	lb/day	< 0.036			1		
2.25	1,1,1-trichloroethane (71-55-6)	☑	☐	☐	Concentration	ug/L	< 0.46			1		
					Mass	lb/day	< 0.035			1		
2.26	1,1,2-trichloroethane (79-00-5)	☑	☐	☐	Concentration	ug/L	< 0.46			1		
					Mass	lb/day	< 0.035			1		
2.27	Trichloroethylene (79-01-6)	☑	☐	☐	Concentration	ug/L	< 0.43			1		
					Mass	lb/day	< 0.032			1		
2.28	Vinyl chloride (75-01-4)	☑	☐	☐	Concentration	ug/L	< 0.53			1		
					Mass	lb/day	< 0.040			1		
Section 3. Organic Toxic Pollutants (GC/MS Fraction—Acid Compounds)												
3.1	2-chlorophenol (95-57-8)	☑	☐	☐	Concentration	ug/L	< 0.228			1		
					Mass	lb/day	< 0.017			1		
3.2	2,4-dichlorophenol (120-83-2)	☑	☐	☐	Concentration	ug/L	< 0.347			1		
					Mass	lb/day	< 0.026			1		
3.3	2,4-dimethylphenol (105-67-9)	☑	☐	☐	Concentration	ug/L	< 0.357			1		
					Mass	lb/day	< 0.027			1		
3.4	4,6-dinitro-o-cresol (534-52-1)	☑	☐	☐	Concentration	ug/L	< 0.248			1		
					Mass	lb/day	< 0.019			1		
3.5	2,4-dinitrophenol (51-28-5)	☑	☐	☐	Concentration	ug/L	< 2.59			1		
					Mass	lb/day	< 0.195			1		

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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
3.6	2-nitrophenol (88-75-5)	☑	☐	☐	Concentration	ug/L	< 0.338			1		
					Mass	lb/day	< 0.025			1		
3.7	4-nitrophenol (100-02-7)	☑	☐	☐	Concentration	ug/L	< 1.08			1		
					Mass	lb/day	< 0.081			1		
3.8	p-chloro-m-cresol (59-50-7)	☑	☐	☐	Concentration	ug/L	< 0.208			1		
					Mass	lb/day	< 0.016			1		
3.9	Pentachlorophenol (87-86-5)	☑	☐	☐	Concentration	ug/L	< 0.963			1		
					Mass	lb/day	< 0.072	< 0.072		1		
3.10	Phenol (108-95-2)	☑	☐	☐	Concentration	ug/L	< 0.208			1		
					Mass	lb/day	< 0.016			1		
3.11	2,4,6-trichlorophenol (88-05-2)	☑	☐	☐	Concentration	ug/L	< 0.248			1		
					Mass	lb/day	< 0.019			1		
Section 4. Organic Toxic Pollutants (GC/MS Fraction—Base /Neutral Compounds)												
4.1	Acenaphthene (83-32-9)	☑	☐	☐	Concentration	ug/L	< 0.0804			1		
					Mass	lb/day	< 0.006			1		
4.2	Acenaphthylene (208-96-8)	☑	☐	☐	Concentration	ug/L	< 0.0744			1		
					Mass	lb/day	< 0.006			1		
4.3	Anthracene (120-12-7)	☑	☐	☐	Concentration	ug/L	< 0.0844			1		
					Mass	lb/day	< 0.006			1		
4.4	Benzidine (92-87-5)	☑	☐	☐	Concentration	ug/L	< 1.98			1		
					Mass	lb/day	< 0.149			1		
4.5	Benzo (a) anthracene (56-55-3)	☑	☐	☐	Concentration	ug/L	< 0.0983			1		
					Mass	lb/day	< 0.007			1		
4.6	Benzo (a) pyrene (50-32-8)	☑	☐	☐	Concentration	ug/L	< 0.0437			1		
					Mass	lb/day	< 0.003			1		

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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
4.7	3,4-benzofluoranthene (205-99-2)	☑	☐	☐	Concentration	ug/L	< 0.0506			1		
					Mass	lb/day	< 0.004			1		
4.8	Benzo (ghi) perylene (191-24-2)	☑	☐	☐	Concentration	ug/L	< 0.0883			1		
					Mass	lb/day	< 0.007			1		
4.9	Benzo (k) fluoranthene (207-08-9)	☑	☐	☐	Concentration	ug/L	< 0.0476			1		
					Mass	lb/day	< 0.004			1		
4.10	Bis (2-chloroethoxy) methane (111-91-1)	☑	☐	☐	Concentration	ug/L	< 0.288			1		
					Mass	lb/day	< 0.022			1		
4.11	Bis (2-chloroethyl) ether (111-44-4)	☑	☐	☐	Concentration	ug/L	< 0.367			1		
					Mass	lb/day	< 0.028			1		
4.12	Bis (2-chloroisopropyl) ether (102-80-1)	☑	☐	☐	Concentration	ug/L	< 0.228			1		
					Mass	lb/day	< 0.017			1		
4.13	Bis (2-ethylhexyl) phthalate (117-81-7)	☑	☐	☐	Concentration	ug/L	< 0.397			1		
					Mass	lb/day	< 0.030			1		
4.14	4-bromophenyl phenyl ether (101-55-3)	☑	☐	☐	Concentration	ug/L	< 0.328			1		
					Mass	lb/day	< 0.025			1		
4.15	Butyl benzyl phthalate (85-68-7)	☑	☐	☐	Concentration	ug/L	< 0.298			1		
					Mass	lb/day	< 0.022			1		
4.16	2-chloronaphthalene (91-58-7)	☑	☐	☐	Concentration	ug/L	< 0.0744			1		
					Mass	lb/day	< 0.006			1		
4.17	4-chlorophenyl phenyl ether (7005-72-3)	☑	☐	☐	Concentration	ug/L	< 0.308			1		
					Mass	lb/day	< 0.023			1		
4.18	Chrysene (218-01-9)	☑	☐	☐	Concentration	ug/L	< 0.0476			1		
					Mass	lb/day	< 0.004			1		
4.19	Dibenzo (a,h) anthracene (53-70-3)	☑	☐	☐	Concentration	ug/L	< 0.0725			1		
					Mass	lb/day	< 0.005			1		

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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
4.20	1,2-dichlorobenzene (95-50-1)	☑	☐	☐	Concentration	ug/L	< 0.387			1		
					Mass	lb/day	< 0.029			1		
4.21	1,3-dichlorobenzene (541-73-1)	☑	☐	☐	Concentration	ug/L	< 0.645			1		
					Mass	lb/day	< 0.048			1		
4.22	1,4-dichlorobenzene (106-46-7)	☑	☐	☐	Concentration	ug/L	< 0.318			1		
					Mass	lb/day	< 0.024			1		
4.23	3,3-dichlorobenzidine (91-94-1)	☑	☐	☐	Concentration	ug/L	< 0.457			1		
					Mass	lb/day	< 0.034			1		
4.24	Diethyl phthalate (84-66-2)	☑	☐	☐	Concentration	ug/L	< 0.169			1		
					Mass	lb/day	< 0.013			1		
4.25	Dimethyl phthalate (131-11-3)	☑	☐	☐	Concentration	ug/L	< 0.645			1		
					Mass	lb/day	< 0.048			1		
4.26	Di-n-butyl phthalate (84-74-2)	☑	☐	☐	Concentration	ug/L	< 0.208			1		
					Mass	lb/day	< 0.016			1		
4.27	2,4-dinitrotoluene (121-14-2)	☑	☐	☐	Concentration	ug/L	< 0.172			1		
					Mass	lb/day	< 0.013			1		
4.28	2,6-dinitrotoluene (606-20-2)	☑	☐	☐	Concentration	ug/L	< 0.109			1		
					Mass	lb/day	< 0.008			1		
4.29	Di-n-octyl phthalate (117-84-0)	☑	☐	☐	Concentration	ug/L	< 0.526			1		
					Mass	lb/day	< 0.040			1		
4.30	1,2-Diphenylhydrazine (as azobenzene) (122-66-7)	☑	☐	☐	Concentration	ug/L	< 0.218			1		
					Mass	lb/day	< 0.016			1		
4.31	Fluoranthene (206-44-0)	☑	☐	☐	Concentration	ug/L	< 0.0821			1		
					Mass	lb/day	< 0.006			1		
4.32	Fluorene (86-73-7)	☑	☐	☐	Concentration	ug/L	< 0.0506			1		
					Mass	lb/day	< 0.004			1		

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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
4.33	Hexachlorobenzene (118-74-1)	☑	☐	☐	Concentration	ug/L	< 0.437			1		
					Mass	lb/day	< 0.033			1		
4.34	Hexachlorobutadiene (87-68-3)	☑	☐	☐	Concentration	ug/L	< 0.625			1		
					Mass	lb/day	< 0.047			1		
4.35	Hexachlorocyclopentadiene (77-47-4)	☑	☐	☐	Concentration	ug/L	< 1.08			1		
					Mass	lb/day	< 0.081			1		
4.36	Hexachloroethane (67-72-1)	☑	☐	☐	Concentration	ug/L	< 0.615			1		
					Mass	lb/day	< 0.046			1		
4.37	Indeno (1,2,3-cd) pyrene (193-39-5)	☑	☐	☐	Concentration	ug/L	< 0.0665			1		
					Mass	lb/day	< 0.005			1		
4.38	Isophorone (78-59-1)	☑	☐	☐	Concentration	ug/L	< 0.338			1		
					Mass	lb/day	< 0.025			1		
4.39	Naphthalene (91-20-3)	☑	☐	☐	Concentration	ug/L	< 0.0665			1		
					Mass	lb/day	< 0.005			1		
4.40	Nitrobenzene (98-95-3)	☑	☐	☐	Concentration	ug/L	< 0.258			1		
					Mass	lb/day	< 0.019			1		
4.41	N-nitrosodimethylamine (62-75-9)	☑	☐	☐	Concentration	ug/L	< 0.486			1		
					Mass	lb/day	< 0.037			1		
4.42	N-nitrosodi-n-propylamine (621-64-7)	☑	☐	☐	Concentration	ug/L	< 0.347			1		
					Mass	lb/day	< 0.026			1		
4.43	N-nitrosodiphenylamine (86-30-6)	☑	☐	☐	Concentration	ug/L	< 0.486			1		
					Mass	lb/day	< 0.037			1		
4.44	Phenanthrene (85-01-8)	☑	☐	☐	Concentration	ug/L	< 0.0804			1		
					Mass	lb/day	< 0.006			1		
4.45	Pyrene (129-00-0)	☑	☐	☐	Concentration	ug/L	< 0.0865			1		
					Mass	lb/day	< 0.007			1		

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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
4.46	1,2,4-trichlorobenzene (120-82-1)	☑	☐	☐	Concentration	ug/L	< 0.407			1		
					Mass	lb/day	< 0.031			1		
Section 5. Organic Toxic Pollutants (GC/MS Fraction—Pesticides)												
5.1	Aldrin (309-00-2)	☐	☐	☑	Concentration							
					Mass							
5.2	α-BHC (319-84-6)	☐	☐	☑	Concentration							
					Mass							
5.3	β-BHC (319-85-7)	☐	☐	☑	Concentration							
					Mass							
5.4	γ-BHC (58-89-9)	☐	☐	☑	Concentration							
					Mass							
5.5	δ-BHC (319-86-8)	☐	☐	☑	Concentration							
					Mass							
5.6	Chlordane (57-74-9)	☐	☐	☑	Concentration							
					Mass							
5.7	4,4'-DDT (50-29-3)	☐	☐	☑	Concentration							
					Mass							
5.8	4,4'-DDE (72-55-9)	☐	☐	☑	Concentration							
					Mass							
5.9	4,4'-DDD (72-54-8)	☐	☐	☑	Concentration							
					Mass							
5.10	Dieldrin (60-57-1)	☐	☐	☑	Concentration							
					Mass							
5.11	α-endosulfan (115-29-7)	☐	☐	☑	Concentration							
					Mass							

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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
5.12	β-endosulfan (115-29-7)	☐	☐	☑	Concentration							
					Mass							
5.13	Endosulfan sulfate (1031-07-8)	☐	☐	☑	Concentration							
					Mass							
5.14	Endrin (72-20-8)	☐	☐	☑	Concentration							
					Mass							
5.15	Endrin aldehyde (7421-93-4)	☐	☐	☑	Concentration							
					Mass							
5.16	Heptachlor (76-44-8)	☐	☐	☑	Concentration							
					Mass							
5.17	Heptachlor epoxide (1024-57-3)	☐	☐	☑	Concentration							
					Mass							
5.18	PCB-1242 (53469-21-9)	☐	☐	☑	Concentration							
					Mass							
5.19	PCB-1254 (11097-69-1)	☐	☐	☑	Concentration							
					Mass							
5.20	PCB-1221 (11104-28-2)	☐	☐	☑	Concentration							
					Mass							
5.21	PCB-1232 (11141-16-5)	☐	☐	☑	Concentration							
					Mass							
5.22	PCB-1248 (12672-29-6)	☐	☐	☑	Concentration							
					Mass							
5.23	PCB-1260 (11096-82-5)	☐	☐	☑	Concentration							
					Mass							
5.24	PCB-1016 (12674-11-2)	☐	☐	☑	Concentration							
					Mass							

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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
5.25	Toxaphene (8001-35-2)	☐	☐	☑	Concentration							
					Mass							

[1] Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR Chapter I, Subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

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TABLE C. CERTAIN CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.21(g)(7)(vi))[1]

	Pollutant	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
		Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
☐	Check here if you believe all pollutants in Table C to be ***present*** in your discharge from the noted outfall. You need *not* complete the "Presence or Absence" column of Table C for *each* pollutant.										
☐	Check here if you believe all pollutants in Table C to be ***absent*** in your discharge from the noted outfall. You need *not* complete the "Presence or Absence" column of Table C for *each* pollutant.										
1.	Bromide (24959-67-9)	☑	☐	Concentration	mg/L	1.61			1		
				Mass	lb/day	121			1		
2.	Chlorine, total residual	☐	☑	Concentration	mg/L	0.03			1		
				Mass	lb/day	2.26			1		
3.	Color	☑	☐	Concentration	CU	40			1		
				Mass	NA	NA			1		
4.	Fecal coliform	☑	☐	Concentration	MPN100m	5.2			1		
				Mass	NA	NA			1		
5.	Fluoride (16984-48-8)	☑	☐	Concentration	mg/L	0.498	0.453	0.383	74		
				Mass	lb/day	50.8	42.6	32.8	74		
6	Nitrate-nitrite	☑	☐	Concentration	mg/L	1.52			1		
				Mass	lb/day	114			1		
7.	Nitrogen, total organic (as N)	☑	☐	Concentration	mg/L	1.30			1		
				Mass	lb/day	97.7			1		
8.	Oil and grease	☑	☐	Concentration	mg/L	2.64	1.73	1.49	74		
				Mass	lb/day	291	180	128	74		
9.	Phosphorus (as P), total (7723-14-0)	☑	☐	Concentration	mg/L	0.160	0.160	0.132	5		
				Mass	lb/day	14.6	14.6	11.0	5		
10.	Sulfate (as SO_4) (14808-79-8)	☑	☐	Concentration	mg/L	141			1		
				Mass	lb/day	10,602			1		
11.	Sulfide (as S)	☐	☑	Concentration	mg/L	< 0.84			1		
				Mass	lb/day	< 63.2			1		

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TABLE C. CERTAIN CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.21(g)(7)(vi))[1]

	Pollutant	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
		Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
12.	Sulfite (as SO_3) (14265-45-3)	☐	☑	Concentration	mg/L	< 2.0			1		
				Mass	lb/day	< 150			1		
13.	Surfactants	☐	☑	Concentration	mg/L	< 0.119			1		
				Mass	lb/day	< 8.95			1		
14.	Aluminum, total (7429-90-5)	☑	☐	Concentration	mg/L	0.0344			1		
				Mass	lb/day	2.59			1		
15.	Barium, total (7440-39-3)	☑	☐	Concentration	mg/L	0.0654			1		
				Mass	lb/day	4.92			1		
16.	Boron, total (7440-42-8)	☑	☐	Concentration	mg/L	0.177			1		
				Mass	lb/day	13.3			1		
17.	Cobalt, total (7440-48-4)	☐	☑	Concentration	mg/L	< 0.00027			1		
				Mass	lb/day	< 0.020			1		
18.	Iron, total (7439-89-6)	☑	☐	Concentration	mg/L	1.70	1.70	0.86	19		
				Mass	lb/day	140	140	73	19		
19.	Magnesium, total (7439-95-4)	☑	☐	Concentration	mg/L	30.9			1		
				Mass	lb/day	2323			1		
20.	Molybdenum, total (7439-98-7)	☑	☐	Concentration	mg/L	0.0119			1		
				Mass	lb/day	0.895			1		
21.	Manganese, total (7439-96-5)	☑	☐	Concentration	mg/L	0.0574			1		
				Mass	lb/day	4.32			1		
22.	Tin, total (7440-31-5)	☑	☐	Concentration	mg/L	0.00272			1		
				Mass	lb/day	0.205			1		
23.	Titanium, total (7440-32-6)	☑	☐	Concentration	mg/L	0.00168			1		
				Mass	lb/day	0.126			1		

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TABLE C. CERTAIN CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.21(g)(7)(vi))[1]

	Pollutant	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
		Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
24.	**Radioactivity**										
	Alpha, total	☐	☑	Concentration							
				Mass							
	Beta, total	☐	☑	Concentration							
				Mass							
	Radium, total	☐	☑	Concentration							
				Mass							
	Radium 226, total	☐	☑	Concentration							
				Mass							

[1] Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR Chapter I, Subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

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TABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
1.	Asbestos	☐	☑		
2.	Acetaldehyde	☐	☑		
3.	Allyl alcohol	☐	☑		
4.	Allyl chloride	☐	☑		
5.	Amyl acetate	☐	☑		
6.	Aniline	☐	☑		
7.	Benzonitrile	☐	☑		
8.	Benzyl chloride	☐	☑		
9.	Butyl acetate	☐	☑		
10.	Butylamine	☐	☑		
11.	Captan	☐	☑		
12.	Carbaryl	☐	☑		
13.	Carbofuran	☐	☑		
14.	Carbon disulfide	☐	☑		
15.	Chlorpyrifos	☐	☑		
16.	Coumaphos	☐	☑		
17.	Cresol	☐	☑		
18.	Crotonaldehyde	☐	☑		
19.	Cyclohexane	☐	☑		

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TABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
20.	2,4-D (2,4-dichlorophenoxyacetic acid)	☐	☑		
21.	Diazinon	☐	☑		
22.	Dicamba	☐	☑		
23.	Dichlobenil	☐	☑		
24.	Dichlone	☐	☑		
25.	2,2-dichloropropionic acid	☐	☑		
26.	Dichlorvos	☐	☑		
27.	Diethyl amine	☐	☑		
28.	Dimethyl amine	☐	☑		
29.	Dintrobenzene	☐	☑		
30.	Diquat	☐	☑		
31.	Disulfoton	☐	☑		
32.	Diuron	☐	☑		
33.	Epichlorohydrin	☐	☑		
34.	Ethion	☐	☑		
35.	Ethylene diamine	☐	☑		
36.	Ethylene dibromide	☐	☑		
37.	Formaldehyde	☐	☑		
38.	Furfural	☐	☑		

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
ILR000121665	IL0000329	USS Granite City Works	001

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TABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
39.	Guthion	☐	☑		
40.	Isoprene	☐	☑		
41.	Isopropanolamine	☐	☑		
42.	Kelthane	☐	☑		
43.	Kepone	☐	☑		
44.	Malathion	☐	☑		
45.	Mercaptodimethur	☐	☑		
46.	Methoxychlor	☐	☑		
47.	Methyl mercaptan	☐	☑		
48.	Methyl methacrylate	☐	☑		
49.	Methyl parathion	☐	☑		
50.	Mevinphos	☐	☑		
51.	Mexacarbate	☐	☑		
52.	Monoethyl amine	☐	☑		
53.	Monomethyl amine	☐	☑		
54.	Naled	☐	☑		
55.	Naphthenic acid	☐	☑		
56.	Nitrotoluene	☐	☑		
57.	Parathion	☐	☑		

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
ILR000121665	IL0000329	USS Granite City Works	001

OMB No. 2040-0004
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TABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
58.	Phenolsulfonate	☐	☑		
59.	Phosgene	☐	☑		
60.	Propargite	☐	☑		
61.	Propylene oxide	☐	☑		
62.	Pyrethrins	☐	☑		
63.	Quinoline	☐	☑		
64.	Resorcinol	☐	☑		
65.	Strontium	☐	☑		
66.	Strychnine	☐	☑		
67.	Styrene	☐	☑		
68.	2,4,5-T (2,4,5-trichlorophenoxyacetic acid)	☐	☑		
69.	TDE (tetrachlorodiphenyl ethane)	☐	☑		
70.	2,4,5-TP [2-(2,4,5-trichlorophenoxy) propanoic acid]	☐	☑		
71.	Trichlorofon	☐	☑		
72.	Triethanolamine	☐	☑		
73.	Triethylamine	☐	☑		
74.	Trimethylamine	☐	☑		
75.	Uranium	☐	☑		
76.	Vanadium	☐	☑		

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
ILR000121665	IL0000329	USS Granite City Works	001

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TABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
77.	Vinyl acetate	☐	☑		
78.	Xylene	☐	☑		
79.	Xylenol	☐	☑		
80.	Zirconium	☐	☑		

[1] Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR Chapter I, Subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
ILR000121665	IL0000329	USS Granite City Works	

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TABLE E. 2,3,7,8 TETRACHLORODIBENZO P DIOXIN (2,3,7,8 TCDD) (40 CFR 122.21(g)(7)(viii))

Pollutant	TCDD Congeners Used or Manufactured	Presence or Absence (check one)		Results of Screening Procedure
		Believed Present	Believed Absent	
2,3,7,8-TCDD	☐	☐	☑	

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Form 2F NPDES

U.S Environmental Protection Agency
Application for NPDES Permit to Discharge Wastewater

STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY

SECTION 1. OUTFALL LOCATION (40 CFR 122.21(G)(1))

Outfall Location

1.1 Provide information on each of the facility's outfalls in the table below

Outfall Number	Receiving Water Name	Latitude	Longitude
001	Horseshoe Lake	38 deg 41 min 31 sec	90 deg 6 min 28 sec
B01	No direct discharge	NA	NA
C01	No direct discharge	NA	NA

SECTION 2. IMPROVEMENTS (40 CFR 122.21(G)(6))

Improvements

2.1 Are you presently required by any federal, state, or local authority to meet an implementation schedule for constructing, upgrading, or operating wastewater treatment equipment or practices or any other environmental programs that could affect the discharges described in this application?

☐ Yes ☑ No ➔ SKIP to Section 3.

2.2 Briefly identify each applicable project in the table below.

Brief Identification and Description of Project	Affected Outfalls (list outfall numbers)	Source(s) of Discharge	Final Compliance Dates	
			Required	Projected

2.3 Have you attached sheets describing any additional water pollution control programs (or other environmental projects that may affect your discharges) that you now have underway or planned? *(optional item)*

☐ Yes ☐ No

EPA Identification Number	NPDES Permit Number	Facility Name
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SECTION 3. SITE DRAINAGE MAP (40 CFR 122.26(C)(1)(I)(A))

Site Drainage Map

3.1 Have you attached a site drainage map containing all required information to this application? (See instructions for specific guidance.)

☑ Yes

SECTION 4. POLLUTANT SOURCES (40 CFR 122.26(C)(1)(I)(B))

Pollutant Sources

4.1 Provide information on the facility's pollutant sources in the table below.

Outfall Number	Impervious Surface Area (within a mile radius of the facility)		Total Surface Area Drained (within a mile radius of the facility)	
001	130	*specify units* acres	1040	*specify units* acres
		specify units		*specify units*
		specify units		*specify units*
		specify units		*specify units*
		specify units		*specify units*
		specify units		*specify units*

4.2 Provide a narrative description of the facility's significant material in the space below. (See instructions for content requirements.)

Significant materials that may be exposed to stormwater are Iron ore, limestone, coke, slag; oil, fuel and chemical tanks; scrap steel; steel slabs and coils. Iron ore, limestone, and coke are stored In piles for use in the blast furnace (indefinitely idle). Slag Is placed In piles and processed bya third-party company on the U.S. Steel property. Oil, fuel and chemical tanks are maintained within containment and job procedures are In place to control proper loading/unloading. Scrap steel, slabs and coils are placed In designated areas. The drainage from these material areas all enters stormwater conveyances that flow to the Central Treatment Plant. No stormwater discharges from the site untreated.

4.3 Provide the location and a description of existing structural and non-structural control measures to reduce pollutants in stormwater runoff. (See instructions for specific guidance.)

Stormwater Treatment		
Outfall Number	Control Measures and Treatment	Codes from Exhibit 2F–1 (list)
001	See Attachment 3.1	

EPA Identification Number	NPDES Permit Number	Facility Name
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SECTION 5. NON STORMWATER DISCHARGES (40 CFR 122.26(C)(1)(I)(C))

Non-Stormwater Discharges

5.1 Provide the following certification. (See instructions to determine the appropriate person to sign the application.)

I certify under penalty of law that the outfall(s) covered by this application have been tested or evaluated for the presence of non-stormwater discharges. Moreover, I certify that the outfalls identified as having non-stormwater discharges are described in either an accompanying NPDES Form 2C, 2D, or 2E application.

Name (print or type first and last name)	Official title
Michael Patton	General Manager
Signature 	**Date signed** 7-30-25

5.2 Provide the testing information requested in the table below.

Outfall Number	Description of Testing Method Used	Date(s) of Testing	Onsite Drainage Points Directly Observed During Test
001	See Form 2C		

SECTION 6. SIGNIFICANT LEAKS OR SPILLS (40 CFR 122.26(C)(1)(I)(D))

Significant Leaks or Spills

6.1 Describe any significant leaks or spills of toxic or hazardous pollutants in the last three years.

None

SECTION 7. DISCHARGE INFORMATION (40 CFR 122.26(C)(1)(I)(E))

Discharge Information

See the instructions to determine the pollutants and parameters you are required to monitor and, in turn, the tables you must complete. Not all applicants need to complete each table.

7.1 Is this a new source or new discharge?

☐ Yes ➔ See instructions regarding submission of *estimated* data.

☑ No ➔ See instructions regarding submission of *actual* data.

Tables A, B, C, and D

7.2 Have you completed Table A for each outfall?

☐ Yes

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Discharge Information Continued

7.3	Is the facility subject to an effluent limitation guideline (ELG) or effluent limitations in an NPDES permit for its process wastewater? ☑ Yes ☐ No ➔ SKIP to Item 7.5.
7.4	Have you completed Table B by providing quantitative data for those pollutants that are (1) limited either directly or indirectly in an ELG and/or (2) subject to effluent limitations in an NPDES permit for the facility's process wastewater? ☑ Yes
7.5	Do you know or have reason to believe any pollutants in Exhibit 2F–2 are present in the discharge? ☑ Yes ☐ No ➔ SKIP to Item 7.7.
7.6	Have you listed all pollutants in Exhibit 2F–2 that you know or have reason to believe are present in the discharge and provided quantitative data or an explanation for those pollutants in Table C? ☐ Yes
7.7	Do you qualify for a small business exemption under the criteria specified in the Instructions? ☐ Yes ➔ SKIP to Item 7.18. ☑ No
7.8	Do you know or have reason to believe any pollutants in Exhibit 2F–3 are present in the discharge? ☑ Yes ☐ No ➔ SKIP to Item 7.10.
7.9	Have you listed all pollutants in Exhibit 2F–3 that you know or have reason to believe are present in the discharge in Table C? ☐ Yes
7.10	Do you expect any of the pollutants in Exhibit 2F–3 to be discharged in concentrations of 10 ppb or greater? ☑ Yes ☐ No ➔ SKIP to Item 7.12.
7.11	Have you provided quantitative data in Table C for those pollutants in Exhibit 2F–3 that you expect to be discharged in concentrations of 10 ppb or greater? ☐ Yes
7.12	Do you expect acrolein, acrylonitrile, 2,4-dinitrophenol, or 2-methyl-4,6-dinitrophenol to be discharged in concentrations of 100 ppb or greater? ☐ Yes ☑ No ➔ SKIP to Item 7.14.
7.13	Have you provided quantitative data in Table C for the pollutants identified in Item 7.12 that you expect to be discharged in concentrations of 100 ppb or greater? ☐ Yes
7.14	Have you provided quantitative data or an explanation in Table C for pollutants you expect to be present in the discharge at concentrations less than 10 ppb (or less than 100 ppb for the pollutants identified in Item 7.12)? ☐ Yes
7.15	Do you know or have reason to believe any pollutants in Exhibit 2F–4 are present in the discharge? ☐ Yes ☑ No ➔ SKIP to Item 7.17.

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Discharge Information Continued

7.16	Have you listed pollutants in Exhibit 2F–4 that you know or believe to be present in the discharge and provided an explanation in Table C? ☐ Yes
7.17	Have you provided information for the storm event(s) sampled in Table D? ☐ Yes

Used or Manufactured Toxics

7.18	Is any pollutant listed on Exhibits 2F–2 through 2F–4 a substance or a component of a substance used or manufactured as an intermediate or final product or byproduct? ☑ Yes ☐ No ➔ SKIP to Section 8.
7.19	List the pollutants below, including TCDD if applicable. Attach additional sheets, if necessary.

1. See Attachment 7.19	4.	7.
2.	5.	8.
3.	6.	9.

SECTION 8. BIOLOGICAL TOXICITY TESTING DATA (40 CFR 122.21(G)(11))

Biological Toxicity Testing Data

8.1	Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made on any of your discharges or on a receiving water in relation to your discharge within the last three years? ☐ Yes ☑ No ➔ SKIP to Section 9.
8.2	Identify the tests and their purposes below.

Test(s)	Purpose of Test(s)	Submitted to NPDES Permitting Authority?	Date Submitted
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	

SECTION 9. CONTRACT ANALYSIS INFORMATION (40 CFR 122.21(G)(12))

Contract Analysis Information

9.1	Were any of the analyses reported in Section 7 (in Tables A through C) performed by a contract laboratory or consulting firm? ☑ Yes ☐ No ➔ SKIP to Section 10.
9.2	Provide information for each contract laboratory or consulting firm below.

	Laboratory Number 1	Laboratory Number 2	Laboratory Number 3
Name of laboratory/firm	Refer to Item 10.2 of Form 2C		
Laboratory address			
Phone number			
Pollutant(s) analyzed			

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SECTION 10. CHECKLIST AND CERTIFICATION STATEMENT (40 CFR 122.22(A) AND (D))

Checklist and Certification Statement

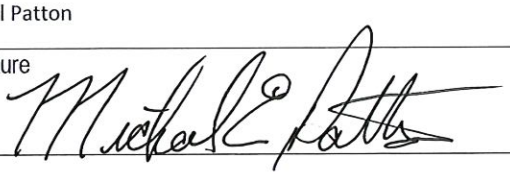
10.1 In Column 1 below, mark the sections of Form 2F that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing to alert the permitting authority. Note that not all applicants are required to complete all sections or provide attachments.

Column 1	Column 2
☑ Section 1	☐ w/ attachments (e.g., responses for additional outfalls)
☑ Section 2	☐ w/ attachments
☑ Section 3	☑ w/ site drainage map
☑ Section 4	☐ w/ attachments
☑ Section 5	☐ w/ attachments
☑ Section 6	☐ w/ attachments
☑ Section 7	☐ Table A ☐ w/ small business exemption request ☐ Table B ☐ w/ analytical results as an attachment ☐ Table C ☐ Table D
☑ Section 8	☐ w/ attachments
☑ Section 9	☐ w/ attachments (e.g., responses for additional contact laboratories or firms)
☑ Section 10	

10.2 Provide the following certification. (See instructions to determine the appropriate person to sign the application.)

Certification Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name (print or type first and last name)	Official title
Michael Patton	General Manager
Signature 	Date signed 7-30-25

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
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TABLE A. CONVENTIONAL AND NON CONVENTIONAL PARAMETERS (40 CFR 122.26(C)(1)(I)(E)(3))[1]

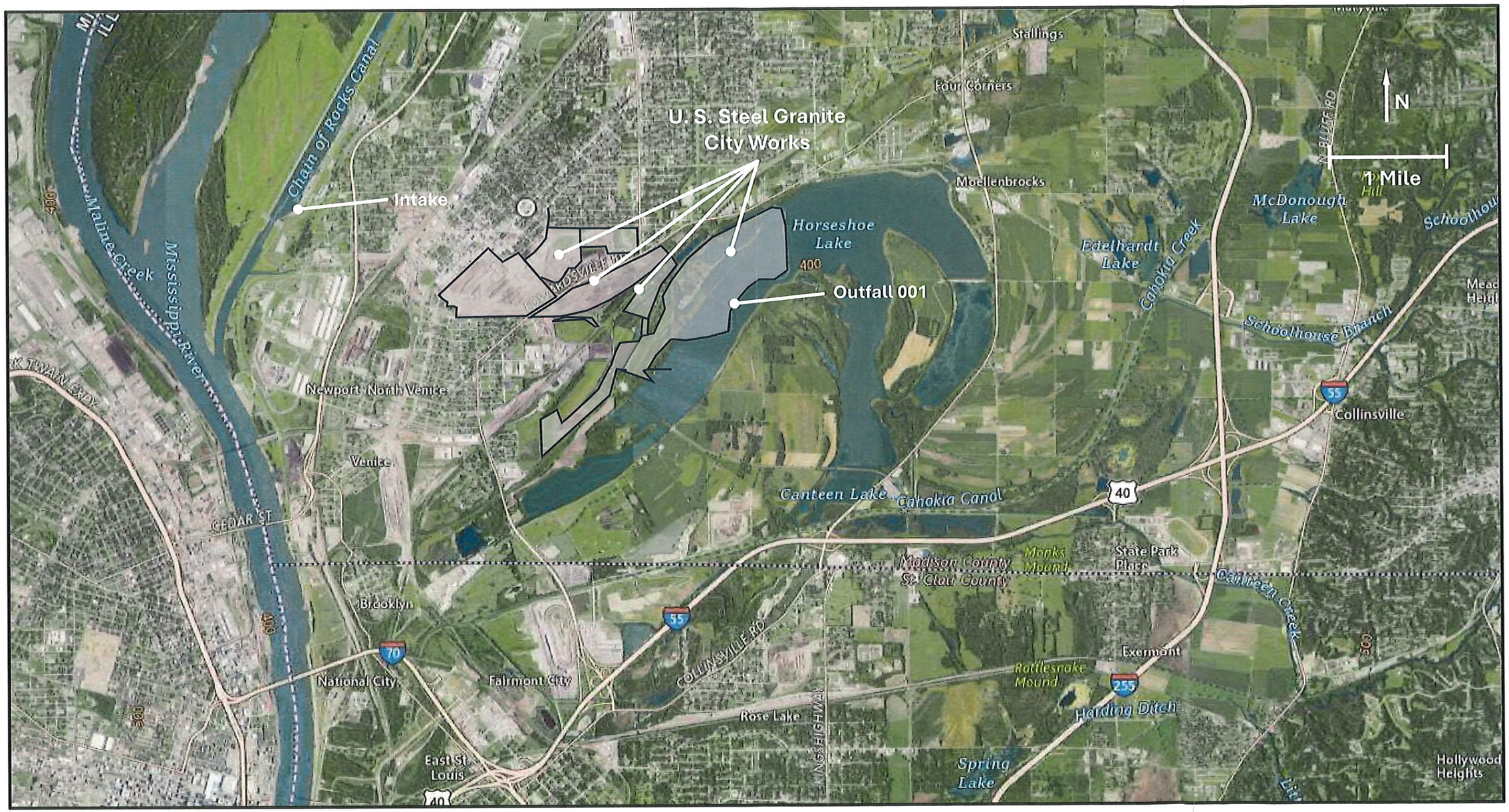
You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details and requirements.

	Pollutant or Parameter	Maximum Daily Discharge (specify units)		Average Daily Discharge (specify units)		Number of Storm Events Sampled	Source of Information (new source/new dischargers only; use codes in instructions)
		Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite		
1.	Oil and grease						
2.	Biochemical oxygen demand (BOD_5)	Refer to Form 2C	for Outfall 001 data				
3.	Chemical oxygen demand (COD)	(all storm water	discharged via	Outfall 001)			
4.	Total suspended solids (TSS)						
5.	Total phosphorus						
6.	Total Kjeldahl nitrogen (TKN)						
7.	Total nitrogen (as N)						
8.	pH (minimum)						
	pH (maximum)						

[1] Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR Chapter I, Subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

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Figure 1: U. S. Steel Granite City Works Topographic Map



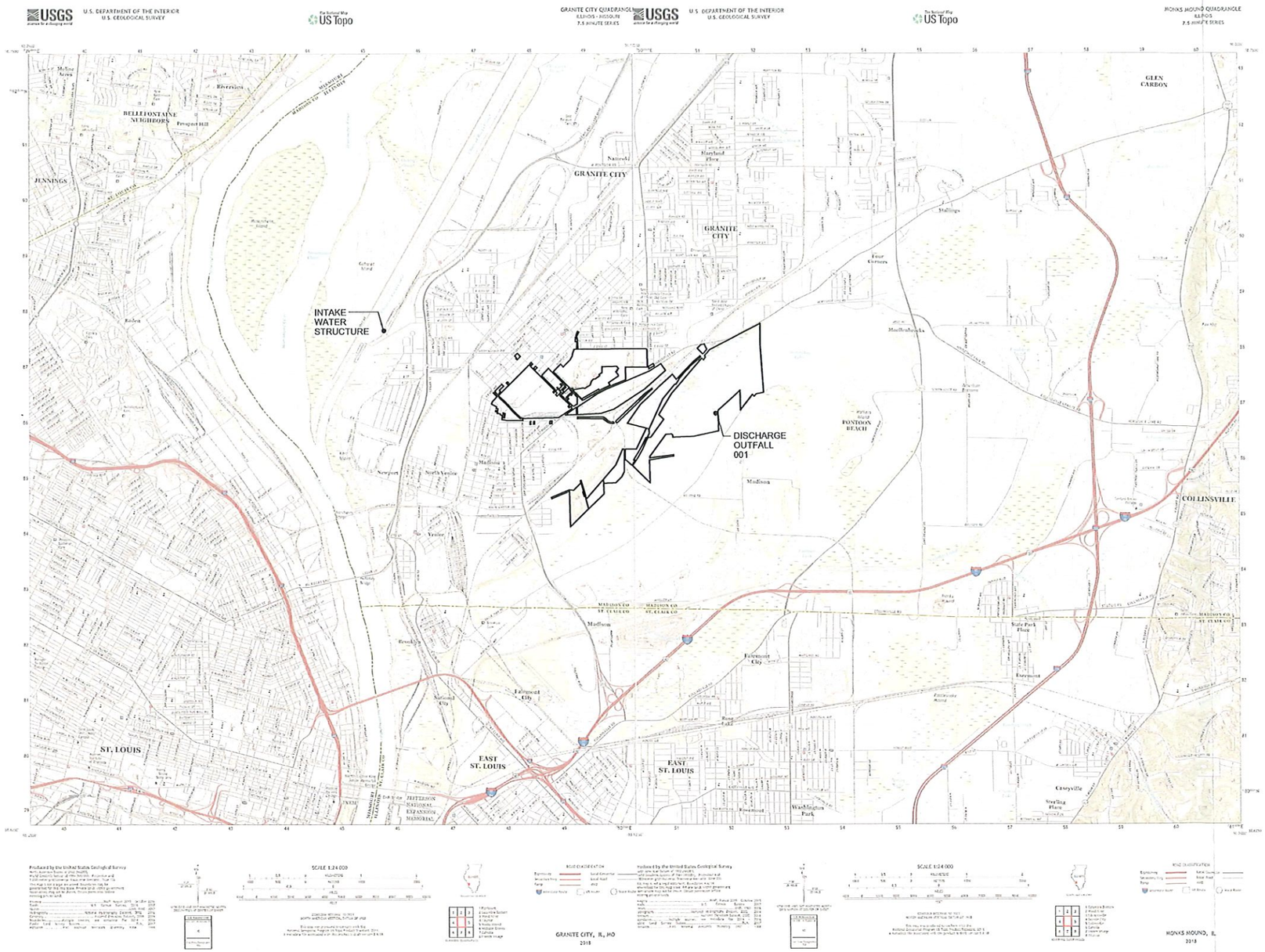
CHAIN OF ROCKS PUMP STATION
10 MMGAL RESERVOIR AND PUMP STATION
CITY WATER
A
B
EVAP.
COOLING TOWER
OIL SKIMMING BASIN
BLAST FURNACE LAGOON
RANNEY WELL NO. 3
RUNOUT TABLE RESERVOIR
CM MOTOR ROOM COOLING
CONTINUOUS PICKLER
CONTINUOUS CASTERS NO. 1 AND 2
COOLING TOWERS
NO. 3 POWERHOUSE
RETURN PUMP STATION
Flue Dust from Blast Fce.
DRYING BEDS
HOT STRIP MILL MOTOR ROOM AND OIL COOLERS
BLOOMING MILL CLEAR WELL
PICKLER SCRUBBER
WATER TREATMENT
OIL SKIMMING BASIN
STEELWORKS LAGOON
HOT STRIP MILL HOT WELL
GATEWAY ENERGY AREA STORM DRAINAGE
N.C.
N.C.
SPRAYS AND COILER COOLING
HSM ROLL GRINDERS
D
GALVANIZING LINE 7A
SLAG PROCESSING STORM
NORTH PLANT POWERHOUSE NO. 3 STORM
TERTIARY TREATMENT PLANT
OUTFALL 001
D
FLUME
BLOOMING MILL SUMP
TRIPLE G GALVANIZING LINE
C
HEAT EXCHANGER BUILDING SUMP
IRONMAKING AREA STORM DRAINAGE
BYPRODUCTS BIO PLANT
SCALE PIT
CM ROLL
CM ROLL SPRAYS
B
DEEP WELL
MISC. SANITARY AND CLEANING SOLUTION FLOWS
OIL / WATER SEPARATOR
OIL SEPARATOR DAF
EVAP.
BLAST FURNACE RESERVOIR AND PUMP HOUSE
80" SLAB FURNACE COOLING
OUTFALL B01
BOF HOODS & MISC.
RANNEY WELL No. 4
NO.4 SLAB FURNACE COOLING
No. 11 and 12 BOILERS
COOLING TOWERS
EVAP.
FLIGHT TANKS.
WATER TREATMENT
MISC. LAB AND SHOP
COOLING TOWER
BOF SUMP
SPRAY
E
E
BLAST FURNACE GAS CLEANING
BLAST FURNACE WWTP
HOT STRIP MILL TEST LAB
EVAP.
SLAG WATER
BUILDING SUMPS
COOLING TOWERS
B.F. GAS LINE DRIP
STEELWORKS STORM DRAINAGE
MISC. STEELWORKS SANITARY AND CLEANING FLOWS
TURBINE PLANT
COOLING TOWER
LABS
OFF-SPEC
STEELWORKS MAINTENANCE
ROUNDHOUSE PIT DRAIN
C
OUTFALL C01
LANDFILL LEACHATE
A

FIGURE 2
USS Granite City Water Line Diagram

- City water supply
- Recycle water / service water supply
- Wastewater

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FIGURE 3



no.	date	by	ckd	description

BURNS McDONNELL

date 11/21/19	detailed BAH
designed KAV	checked 11/21/19

U. S. STEEL CORPORATION
GRANITE CITY WORKS
SITE DRAINAGE MAP

project 116682	contract
drawing CSP002	rev. — 0
sheet	of sheets
file	

\\bmod\Dfs\Client\ENR\USSteel\116682_GCNPDES~June19\Design\Civil\Sketches\116682_SK_CSP001_REV.dgn

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Attachment 2C: NPDES Permit Monitoring Data January 2021 to September 2023 ("Hot End" in operation)

	FLOW		TSS		TSS		Cyanide						Lead			
	MGD		TSS		TSS		CN. Avail		CN. Avail		CN. Total		CN. Total		Lead Total		Lead Total	
	DAILY	M. avg	mg/L	mo. avg	lbs/day	lb/day mo. avg	mg/L	mo. avg	lbs/day	lb/day mo. avg	mg/L	mo. avg	lbs/day	lb/day mo. avg	mg/L	mo. avg	lbs/day	lb/day mo. avg
Max	24.4	18.8	16.60	11.70	1885	1362	0.0031	0.0024	0.361	0.280	0.0042	0.0040	0.7030	0.5022	0.0075	0.0075	0.907	0.869
Avg	13.7	13.7	7.34	7.52	819	833	0.0011	0.0011	0.126	0.126	0.0020	0.0020	0.2422	0.2260	0.0035	0.0034	0.404	0.395
Number of samples	293.0	33.0	191.0	33.0	194	33	66	33	66	33	72	33	72	33	15	13	15	13

	Iron								Zinc				Flouride		Flouride		Phosphorus			
	Iron Dis.		Iron Dis.		Iron Total		Iron Total		Zinc		Zinc		Flouride		Flouride		Phos.		Phos.	
	mg/L	mo. avg	lbs/day	lb/day mo. avg	mg/L	mo. avg	lbs/day	lb/day mo. avg	mg/L	mo. avg	lbs/day	lb/day mo. avg	mg/L	mo. avg	lbs/day	lb/day mo. avg	mg/L	mo. avg	lbs/day	lb/day mo. avg
Max	0.672	0.672	83.2	83.2	2.15	1.78	359	271	0.045	0.034	5.69	3.93	8.80	3.18	1080	388	0.236	0.236	32.2	32.2
Avg	0.0504	0.0558	6.1	6.6	1.10	0.93	139	108	0.0162	0.0162	1.85	1.85	1.54	1.53	179	176	0.124	0.124	14.1	14.1
Number of samples	40	33	40	33	42	33	42	33	286	33	286	33	147	33	147	33	13	13	13	13

	Phenol		Phenol		O&G		O&G		CBOD		CBOD		pH	Ammonia			
	Phenol		Phenol		O&G		O&G		CBOD		CBOD		pH	Ammonia		Ammonia	
	mg/L	mo. avg	lbs/day	lb/day mo. avg	mg/L	mo. avg	lbs/day	lb/day mo. avg	mg/L	mo. avg	lbs/day	lb/day mo. avg	s.u.	mg/L	mo. avg	lbs/day	lb/day mo. avg
Max	0.033	0.014	3.856	1.720	4.60	2.93	503	320	23.70	10.99	2975	1383	8.5	0.890	0.748	139	103
Avg	0.0032	0.0032	0.3730	0.3623	1.73	1.73	200	198	3.85	3.90	437	440	6.7	0.249	0.238	30	28
Number of samples	147	33	147	33	147	33	147	33	153	33	153	33	285	147	33	147	33

Attachment 3.1

For each outfall identified under Item 1.1, provide average flow and treatment information. Add additional sheets if necessary.

Outfall 001

Operation contributing flow	
Operation contributing flow	Average flow, MGD
Blast Furnaces*	13.8
Basic Oxygen Furnaces *	22.2
80" Hot Strip Mill	37.6
Landfill Leachates	0.1
Galvanizing Lines	1.4
Sanitary	0.0
Stormwater	Varies
Continuous Casters *	0.4
Boilers	2.2
Maintenance Shops	Varies
Laboratories	0.0
Miscellaneous Flows	Varies
Continuous Pickler	0.6
Cold Mill (internal Outfall B01)	2.1
Landfill Leachate (internal Outfall C01)	0.0

* Operations are indefinitely idle

Total average Outfall 001 since idling of these operations is 10.16 mgd (January 2024 - May 2025)

Treatment Units		
Description	Code from Exhibit 2C-2	Final Disposal of Solid or Liquid Waste
Coagulation Zone (dosage as needed)	2-D	
Sand filtration (in paralell)	1-R	Solids to GCW landfill
Lagoon	4-A & 4-C	to Outfall 001

Outfall B01

Operation contributing flow	
Operation contributing flow	Average flow, MGD
Cold Mill	2.06

Treatment Units		
Description	Code from Exhibit 2C-2	Final Disposal of Solid or Liquid Waste
Dissolved Air Floatation (8,350 gallon volume)	1-H	

Attachment 5.2 and 5.4 Production
USS Granite City Works

Item 5.2

ELG Category	ELG Subcategory	Regulatory Citation
Iron and Steel Manufacturing	Ironmaking *	40 CFR 420.01(b)
Iron and Steel Manufacturing	Continuous Casting *	40 CFR 420.01(b)
Iron and Steel Manufacturing	Hot Forming	40 CFR 420.01(b)
Iron and Steel Manufacturing	Acid Pickling	40 CFR 420.01(b)
Iron and Steel Manufacturing	Cold Forming	40 CFR 420.01(b)
Iron and Steel Manufacturing	Alkaline Cleaning	40 CFR 420.01(b)
Iron and Steel Manufacturing	Hot Coating	40 CFR 420.01(b)

Note: USS Granite City Works is requesting that the existing Central Treatment Plant Exemption under 40 CFR 420.01(b) be maintained; accordingly the TBELs are not based directly on the Iron and Steel ELGs

Item 5.4

Outfall Number	Operation, Product or Material	Quantity per Day (tons / day)
001	Ironmaking *	6461
001	Continuous Casting *	7086
001	Hot Forming	7899
001	Acid Pickling	2594
001	Cold Forming	2885
001	Alkaline Cleaning	879
001	Hot Coating	879

* Operation indefinitely idle, production rates from prior NPDES pemit application

EXHIBIT C

Electronic Filing: Received, Clerk's Office 10/27/2026 PCB2027-003

Illinois Environmental Protection Agency
2520 West Iles Avenue • P.O. Box 19276 • Springfield, Illinois • 62794-9276 • 217-782-3397

JB Pritzker, Governor **James Jennings**, Acting Director

217/782-0610

APR 07 2026

United States Steel Corporation
1951 State Street
Granite City, Illinois 62040

Re: United States Steel Corporation – Granite City Works
NPDES Permit No. IL0000329
Bureau ID: W1198130003
Draft Permit

Permittee:

Attached to this letter is a copy of the draft Permit, Public Notice/Fact Sheet for your discharge. The Agency proposes to issue the NPDES Permit for your discharge as shown in the draft Permit.

Fifteen days from the date of this letter, the Agency proposes to distribute the attached Public Notice/Fact Sheet statewide. If you have objections to the content of the Public Notice/Fact Sheet, a written statement must be received by the Agency at the indicated address, attention: NPDES PN Clerk within 10 days.

The Agency will receive comments regarding the Permit for a period of 30 days after the Public Notice is issued. If you wish to comment or object to any of the terms and conditions of the Permit, you must state the objections in writing prior to the end of the public notice. The Agency may or may not change the Permit based on comments received from you or the public.

If you should have questions or comments regarding the above, please contact Yousif Alkola at 217/558-8143.

Sincerely,

Stephen F. Nightingale, P.E.
Manager, Industrial Unit, Permit Section
Division of Water Pollution Control

SFN:YA:26010601.docx

Attachments: Draft Permit, Public Notice/Fact Sheet

cc: Records Unit

NPDES Permit No. IL0000329
Notice No. YA:26010601.docx

Public Notice Beginning Date:

Public Notice Ending Date:

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
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62794-9276
217/782-0610

Name and Address of Discharger:

United States Steel Corporation
Granite City Works
1951 State Street
Granite City, Illinois 62040

Name and Address of Facility:

United States Steel Corporation
Granite City Works
20th and State Street
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 Yousif Alkola 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 25.0 MGD of treated process wastewater from Outfall 001, 0.604 MGD of cold rolling mill wastewater from Outfall B01, and 0.20 MGD of landfill leachate wastewater from Outfall C01.

To address Per-and polyfluoroalkyl substances (PFAS) under the NPDES permit program the Illinois Environmental Protection Agency (IEPA), Bureau of Water, Permit Section has implemented a PFAS Reduction Initiative. Under this initiative, it has been determined that those facilities who are classified as a major discharger by USEPA regulations because of the type of industry, volume of wastewater, or type of wastewater being discharged, there is the potential for the facility to use and/or discharge PFAS compounds. Because of this potential many of these facilities will be required by IEPA to perform monitoring for PFAS compounds in their discharges and to implement Best Management Practices to reduce the potential of discharging PFAS to surface waters. Monitoring for PFAS has been added to the effluent limitations, monitoring, and reporting page(s) for Outfall 001, and Special Conditions 12 and 13 have been added to the permit as well.

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 subject facility discharges to the Horseshoe Lake at a point where 0 cfs of flow exists upstream of the outfall during critical 7Q10 low-flow conditions. The facility has a DAF of 25.0 MGD. The facility withdraws water from the Mississippi River and discharges to Horseshoe Lake. Horseshoe lake is classified as a General Use Water. Horseshoe Lake is not listed as a biologically significant stream in the 2008 Illinois Department of Natural Resources Publication Integrating Multiple Taxa in a Biological Stream Rating System, nor is it given an integrity rating in that document. Horseshoe Lake, Waterbody Segment, IL_RJC, is listed on the 2024 Illinois Integrated Water Quality Report and Section 303(d) List as impaired for fish consumption use with potential causes given as aldrin, dieldrin, endrin, heptachlor, mirex and polychlorinated biphenyls, and aesthetic quality use with potential causes given as total phosphorus and total suspended solids. Aquatic life use is fully supported. Horseshoe lake is not subject to enhanced dissolved oxygen standards.

The following parameters have been identified as the pollutants causing impairment:

Designated Use	Potential Cause
Fish Consumption	aldrin, dieldrin, endrin, heptachlor, mirex and polychlorinated biphenyls
Aesthetic Quality	total phosphorus and total suspended solids

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

Outfall: 001 Treated Process Wastewater

IAC = Illinois Administrative Code

	LOAD LIMITS lbs/day DAF (DMF)			CONCENTRATION LIMITS mg/l		
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	REGULATION	30 DAY AVERAGE	DAILY MAXIMUM	REGULATION
Flow (MGD)				Measure		35 IAC 309.146
pH				6.0 - 9.0		35 IAC 304.125
$CBOD_5$	2085	4170	35 IAC 304.120(c)	10	20	35 IAC 304.120(c)
Total Suspended Solids	2502	5004	35 IAC 304.120(c)	12	24	35 IAC 304.120(c)
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)	5.3	16	40 CFR 420	.09	0.4	35 IAC 302.208
Zinc (total)	12	33	40 CFR 420.01(b)	0.17	0.96	40 CFR 120.44(l) 35 IAC 302.208
Cyanide (total)	19	35	35 IAC 304.124	0.1	0.2	35 IAC 302.208
Cyanide (available by OIA 1677)	1.1	4.6	35 IAC 302.208	0.0052	0.022	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	521	2585	35 IAC 355	2.5	12.4	35 IAC 355

Summer	479	3128	35 IAC 355	2.3	15	35 IAC 355
Winter	834	1188	35 IAC 355	4.0	5.7	35 IAC 355
March	688	1188	35 IAC 355	3.3	5.7	35 IAC 355
Phosphorus					Monitor Only	35 IAC 309.146
PFAS**					Report	
PFAS Sum**		**			**	
Tetrachloroethylene					Monitor Only	35 IAC 302
Naphthalene					Monitor Only	35 IAC 302

*Spring/Fall is April-May and September-October. Summer is June-August. Winter is November-February. Weekly average limits apply for Spring/Fall and Summer. Weekly average limits are as follows: Spring/Fall: 6.2 mg/L; Summer: 5.7 mg/L. No weekly average limit applies in Winter or March.
** See Special Condition 12

	LOAD LIMITS lbs/day DAF (DMF)			CONCENTRATION LIMITS mg/l		
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	REGULATION	30 DAY AVERAGE	DAILY MAXIMUM	REGULATION
Outfall: B01 - Cold Rolling Mill Wastewater						
Flow (MGD)				Measure		
Tetrachloroethylene		1.1	40 CFR 420			
Naphthalene		0.69	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 25.0 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, $CBOD_5$, Total Suspended Solids, Iron (total), Iron (dissolved), Cyanide (Total), 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 are based on production from the previous permit application from 2020 at the request of the permittee because production for the most recent 5 years is not representative of future anticipated production trends. Production figures utilized in these calculations for the following subcategories are as follows:

Subcategory	Production Rate
Subpart C - Iron Making Subcategory	7793 tons/day
Subpart D - Steel Making Subcategory	7793 tons/day
Subpart F - Continuous Casting Subcategory	8579 tons/day
Subpart G - Hot Forming Subcategory	11,362 tons/day
Subpart I - Acid Pickling Subcategory	3084 tons/day
Subpart J - Cold Forming Subcategory	2065 tons/day
Subpart K - Alkaline Cleaning Subcategory	1656 tons/day
Subpart L - Hot Coating Subcategory	1656 tons/day

For outfall 001: Oil & Grease, Lead, Zinc, 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:

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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 2065 tons/day x (2000 lb/ton) = 0.69 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.

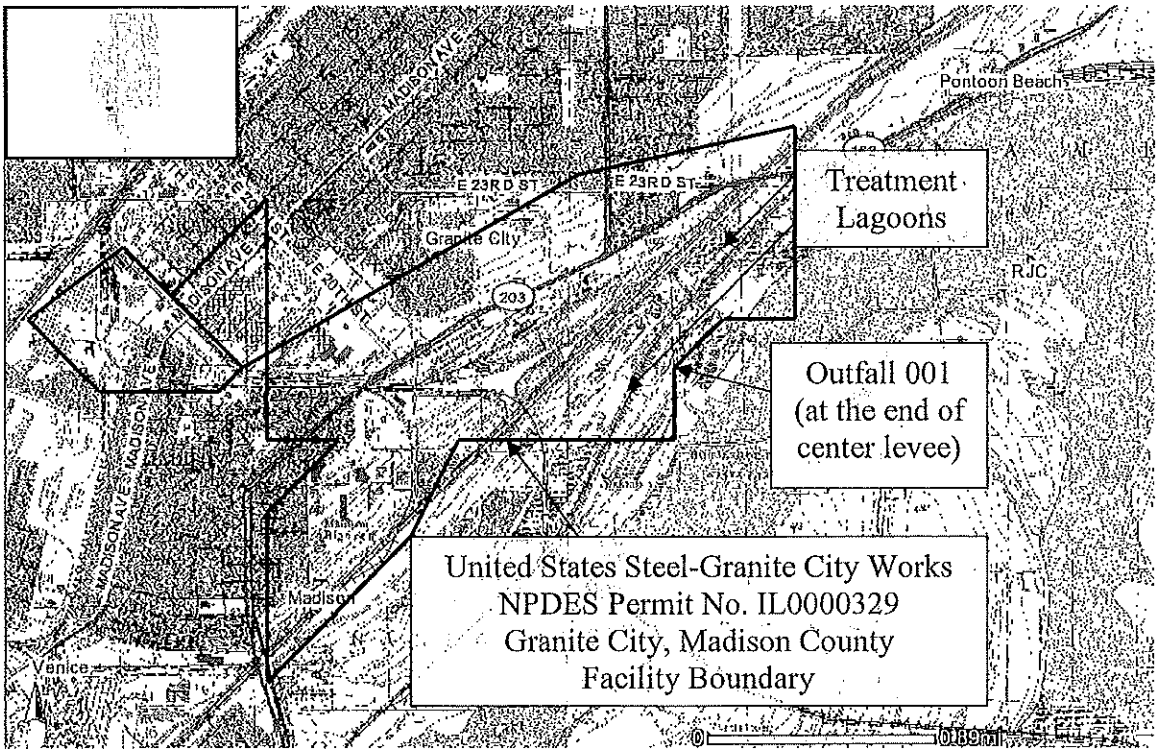
The intake consists of 4 pumps which can pump 13,900 GPM each and pump through a 54-inch diameter pipe. When pumping at the DAF of 25.0 MGD, they give a flow velocity of approximately 2.4 feet/second.

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

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. 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. The permittee shall take additional metals monitoring at outfall 001.

A Total Maximum Daily Load (TMDL) Study has not been completed for Horseshoe Lake for any parameter.



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NPDES Permit No. IL0000329

Illinois Environmental Protection Agency

Division of Water Pollution Control

2520 West Iles Avenue

Post Office Box 19276

Springfield, Illinois 62794-9276

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

Reissued (NPDES) Permit

Expiration Date:

Issue Date:
Effective Date:

Name and Address of Permittee:

United States Steel Corporation
Granite City Works
1951 State Street
Granite City, Illinois 62040

Facility Name and Address:

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

Discharge Number and Name:		Receiving Waters:
001	Treated Process Wastewater	Horseshoe Lake
B01	Cold Rolling Mill Wastewater	Internal Outfall
C01	Landfill Leachate Wastewater	Internal Outfall

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.

Stephen F. Nightingale, P.E.
Manager, Industrial Unit, Permit Section
Division of Water Pollution Control

SFN:YA:26010601.docx

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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 – (DAF = 25.0 MGD)

Treated Process Wastewater consists of wastewater from the blast furnace, basic oxygen furnace, 80" hot strip mill, landfill leachates, galvanizing lines, sanitary, stormwater runoff, continuous casters, boiler blowdown, maintenance shops, laboratories, cold mill, continuous pickler, and miscellaneous flows

	LOAD LIMITS lbs/day DAF (DMF)		CONCENTRATION LIMITS mg/l			
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM	SAMPLE FREQUENCY	SAMPLE TYPE
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	1/Week	Composite
Total Suspended Solids	2502	5004	12	24	1/Week	Composite
Oil & Grease	1511	3492	15	30	1/Week	Grab
Iron (total)	417	834	2	4	1/Month	Composite
Iron (dissolved)		209		1	1/Month	Composite
Lead (total)	5.3	16	0.09	0.4	1/Quarter	Composite
Zinc (total)	12	33	0.17	0.96	2/Week	Composite
Cyanide (total)	19	35	0.1	0.2	2/Month	Composite
Cyanide (available by OIA 1677)	1.1	4.6	0.0052	0.022	2/Month	Composite
Phenol (4AAP)	5.0	10		0.1	1/Week	Composite
Fluoride		834		4	1/Week	Composite
Ammonia-Nitrogen*						
Spring/Fall	521	2585	2.5	12.4	1/Week	Composite
Summer	479	3128	2.3	15.0	1/Week	Composite
Winter	834	1188	4.0	5.7	1/Week	Composite
March	688	1188	3.3	5.7	1/Week	Composite
Phosphorus				Monitor Only	1/Quarter	Grab
PFAS**				Report	**	**
PFAS Sum**		**		**	**	**
Tetrachloroethylene				Monitor Only	2/Year	Grab
Naphthalene				Monitor Only	1/Quarter	Grab

*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 6.2 mg/L (1292 lb/day). Summer weekly average limit is 5.7 mg/L (1188 lb/day). There is no weekly average limit for Winter or March.

** See Special Condition 12

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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): B01, C01

	LOAD LIMITS lbs/day DAF (DMF)		CONCENTRATION LIMITS mg/l			
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM	SAMPLE FREQUENCY	SAMPLE TYPE
Outfall: B01 - Cold Rolling Mill Wastewater						
Flow (MGD)	See Special Condition 1				When Monitoring	Measure
Tetrachloroethylene		1.1			2/Year	Grab
Naphthalene		0.69			1/Quarter	Grab
Outfall: C01 - Landfill Leachate Wastewater						
Flow (MGD)	See Special Condition 1				Continuous	Measure

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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:

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

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) electronic forms using one such form for each outfall each month.

In the event that an outfall does not discharge during a monthly reporting period, the DMR Form shall be submitted with no discharge indicated.

The Permittee will be required to submit electronic DMRs (NetDMRs) instead of mailing paper DMRs to the IEPA beginning December 21, 2016. More information, including registration information for the NetDMR program, can be obtained on the IEPA website, http://www.epa.state.il.us/water/net-dmr/index.html.

The completed Discharge Monitoring Report forms shall be submitted to IEPA no later than the 25th day of the following month, unless otherwise specified by the permitting authority.

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NPDES Permit No. IL0000329

Special Conditions

Permittees that have been granted a waiver shall mail Discharge Monitoring Reports with an original signature to the IEPA at the following address:

Illinois Environmental Protection Agency
Division of Water Pollution Control
Attention: Compliance Assurance Section, Mail Code # 19
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62794-9276

SPECIAL CONDITION 8. 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 9. The Agency has determined that the effluent limitations in this permit constitute BAT/BCT for storm water which is treated in the existing treatment facilities for purposes of this permit reissuance, and no pollution prevention plan will be required for such storm water. In addition to the chemical specific monitoring required elsewhere in this permit, the permittee shall conduct an annual inspection of the facility site to identify areas contributing to a storm water discharge associated with industrial activity, and determine whether any facility modifications have occurred which result in previously-treated storm water discharges no longer receiving treatment. If any such discharges are identified the permittee shall request a modification of this permit within 30 days after the inspection. Records of the annual inspection shall be retained by the permittee for the term of this permit and be made available to the Agency on request.

SPECIAL CONDITION 10. The Permittee shall monitor the effluent from Outfall 001 for the following parameters on a 2/year basis. This Permit may be modified with public notice to establish effluent limitations if appropriate, based on information obtained through sampling. The sample shall be a 24-hour effluent composite except as otherwise specifically provided below and the results shall be submitted on the DMR's to IEPA. The parameters to be sampled and the minimum reporting limits to be attained are as follows:

STORET CODE	PARAMETER	Minimum reporting limit
10197	Antimony	5.0 ug/L
01002	Arsenic	0.05 mg/L
01007	Barium	0.5 mg/L
01027	Cadmium	0.001 mg/L
01032	Chromium (Hexavalent) (grab)	0.01 mg/L
01034	Chromium (total)	0.05 mg/L
01042	Copper	0.005 mg/L
01055	Manganese	0.5 mg/L
71900	Mercury	0.2 ug/L
01067	Nickel	0.005 mg/L
01147	Selenium	0.005 mg/L
01077	Silver (total)	0.003 mg/L

Unless otherwise indicated, concentrations refer to the total amount of the constituent present in all phases, whether solid, suspended or dissolved, elemental or combined, including all oxidation states.

The analyses for the above parameters shall meet the detection limits as established for accepted test procedures listed in 40 CFR 136.

All samples for mercury must be analyzed by EPA Method 1631E using the digestion procedure described in Section 11.1.1.2 of 1631E, which dictates that samples must be heated at 50°C for 6 hours in a bromine chloride (BrCl) solution in closed vessels.

SPECIAL CONDITION 11: This Permit may be modified to include alternative or additional final effluent limitations pursuant to an approved Total Maximum Daily Load (TMDL) Study or upon approval of an alternate Water Quality Study.

Special Conditions

Special Condition 12. PFAS Testing and Reporting

For the duration of this permit the permittee shall sample the discharge at a point of discharge, but prior to discharging to the Publicly Owned Treatment Works sewer system as follows:

Parameter	Sample Frequency	Sample Type	Report****
PFAS****	Quarterly**	grab***	ng/L
PFAS Sum****	Quarterly**	grab***	ng/L

** Quarterly sampling – Testing done during the first quarter (January – March) must be reported in May, testing done in the second quarter (April – June) must be reported in August, testing done in the third quarter (July – September) must be reported in November, and testing done in the fourth quarter (October – December) must be reported in February.

*** If the permittee prefers to collect composite samples instead of grab samples, the permittee will be required to seek approval through the supplemental permit process.

**** The Minimum Level (ML) of quantification established for PFAS by the laboratory, when using the approved analytical method, shall be submitted with the test results to the address identified in Part 6 of this Special Condition.

1) Test results must be reported in nanograms per liter (ng/L) as a daily maximum concentration for aqueous samples. Solid test results must be reported in nanograms per gram (ng/g) as a daily maximum.

2) USEPA Method 1633A - Analysis of Per- and Polyfluoroalkyl Substances (PFAS) in Aqueous, Solid, Biosolids, and Tissue Samples by LC-MS/MS (finalized December 2024) is to be used when testing for PFAS. When PFAS analytical methods are promulgated through rulemaking and incorporated into 40 CFR Part 136, the permittee shall follow the approved methods.

3) When testing for PFAS the laboratory shall determine their limit of quantitation (LOQ) for each analyte in accordance with the test method identified in Part 2 of this Special Condition. The LOQ is synonymous with Minimum Level (ML) and Reporting Limit. The laboratory LOQs (Minimum Levels) must not exceed the upper limit of the aqueous and solid ranges listed in the table in Part 7 of this Special Condition.

4) In addition to the testing and reporting requirements for the individual PFAS analytes listed on Part 7 of this Special Condition the permittee shall report the PFAS Sum. For purposes of this permit the PFAS Sum is the arithmetic summation of the individual analytes listed in Part 7 that are associated with a particular sampling event and location. Results must be submitted to the address identified in Part 6 of this Special Condition.

   Test results for individual analytes which are below the ML as described in Parts 2 and 3 of this Special Condition should be assigned a value of zero (0) when calculating the PFAS Sum.

5) If sample results for PFAS are consistently below the minimum level (ML) of quantification for two consecutive years using USEPA Method 1633A or methods approved under 40 CFR Part136, once finalized, the permittee may request a reevaluation of the testing requirements. Documentation supporting the request for a reduction in monitoring for PFAS must be made by the permittee as a supplemental permit request.

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6) The Permittee shall submit PFAS sampling results required by this Special Condition electronically or in writing to one of the following addresses:

a) EPA.PrmtSpecCondtns@Illinois.gov, or

b) Illinois Environmental Protection Agency
Bureau of Water
Compliance Assurance Section
Mail Code #19
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62794-9276

7) Specific PFAS constituents that must be analyzed for are listed in the following table:

Target Analyte Name	Abbreviation	CASRN Number	STORET	Minimum Level (ML)	
				Aqueous (ng/L)	Solid (ng/g)
Perfluoroalkyl carboxylic acids					
Perfluorobutanoic acid	PFBA	375-22-4	51522	4 – 16	0.64 – 1.6
Perfluoropentanoic acid	PFPeA	2706-90-3	51623	2 – 8	0.32 – 0.8
Perfluorohexanoic acid	PFHxA	307-24-4	51624	1 – 4	0.16 – 0.4
Perfluoroheptanoic acid	PFHpA	375-85-9	51625	1 – 4	0.16 – 0.4
Perfluorooctanoic acid	PFOA	335-67-1	51521	1 – 4	0.16 – 0.4
Perfluorononanoic acid	PFNA	375-95-1	51626	1 – 4	0.16 – 1.3
Perfluorodecanoic acid	PFDA	335-76-2	51627	1 – 4	0.16 – 0.4
Perfluoroundecanoic acid	PFUnA	2058-94-8	51628	1 – 4	0.16 – 0.5
Perfluorododecanoic acid	PFDoA	307-55-1	51629	1 – 4	0.16 – 0.4
Perfluorotridecanoic acid	PFTrDA	72629-94-8	51630	1 – 4	0.16 – 0.4
Perfluorotetradecanoic acid	PFTeDA	376-06-7	51631	1 – 4	0.16 – 0.4
Perfluoroalkyl sulfonic acids					
Acid Form					
Perfluorobutanesulfonic acid	PFBS	375-73-5	52602	1 – 4	0.16 – 0.4
Perfluoropentanesulfonic acid	PFPeS	2706-91-4	52610	1 – 4	0.16 – 0.4

Perfluorohexanesulfonic acid	PFHxS	355-46-4	52605	1 – 4	0.16 – 0.4
Perfluoroheptanesulfonic acid	PFHpS	375-92-8	52604	1 – 4	0.16 – 0.4
Perfluorooctanesulfonic acid	PFOS	1763-23-1	52606	1 – 4	0.16 – 0.4
Perfluorononanesulfonic acid	PFNS	68259-12-1	52611	1 – 4	0.16 – 0.4
Perfluorodecanesulfonic acid	PFDS	335-77-3	52603	1 – 4	0.16 – 0.4
Perfluorododecanesulfonic acid	PFDoS	79780-39-5	52632	1 – 4	0.16 – 0.4
Fluorotelomer sulfonic acids					
1H,1H,2H,2H-Perfluorohexane sulfonic acid	4:2 FTS	757124-72-4	52607	4 – 15	0.64 – 1.5
1H,1H,2H,2H-Perfluorooctane sulfonic acid	6:2 FTS	27619-97-2	52608	4 – 15	0.64 – 1.5
1H,1H, 2H, 2H-Perfluorodecane sulfonic acid	8:2 FTS	39108-34-4	52609	4 – 15	0.64 – 1.5
Perfluorooctane sulfonamides					
Perfluorooctanesulfonamide	PFOSA	754-91-6	51525	1 – 4	0.16 – 0.4
N-methyl perfluorooctanesulfonamide	NMeFOSA	31506-32-8	52641	1 – 4	0.16 – 0.4
N-ethyl perfluorooctanesulfonamide	NEtFOSA	4151-50-2	52642	1 – 4	0.16 – 0.4
Perfluorooctane sulfonamidoacetic acids					
N-methyl perfluorooctanesulfonamidoacetic acid	NMeFOSAA	2355-31-9	51644	1 – 4	0.16 – 0.4
N-ethyl perfluorooctanesulfonamidoacetic acid	NEtFOSAA	2991-50-6	51643	1-4	0.16 – 0.4
Perfluorooctane sulfonamide ethanols					
N-methyl perfluorooctanesulfonamidoethanol	NMeFOSE	24448-09-7	51642	10 – 40	1.6 – 4
N-ethyl perfluorooctanesulfonamidoethanol	NEtFOSE	1691-99-2	51641	10 – 40	1.6 – 4
Per- and Polyfluoroether carboxylic acids					
Hexafluoropropylene oxide dimer acid	HFPO-DA	13252-13-6	52612	2 – 8	0.64 – 1.6
4,8-Dioxa-3H-perfluorononanoic acid	ADONA	919005-14-4	52636	2 – 8	0.64 – 1.5
Perfluoro-3-methoxypropanoic acid	PFMPA	377-73-1	PF002	4 – 16	0.32 – 0.8

Perfluoro-4-methoxybutanoic acid	PFMBA	863090-89-5	PF006	4 – 15	0.32 – 0.8
Nonafluoro-3,6-dioxaheptanoic acid	NFDHA	151772-58-6	52626	2 – 7	0.32 –0.8
Ether sulfonic acids					
9-Chlorohexadecafluoro-3-oxanonane-1- sulfonic acid	9Cl-PF3ONS	756426-58-1	PF003	4 – 15	0.64 – 1.5
11-Chloroeicosafluoro-3-oxaundecane-1- sulfonic acid	11Cl-PF3OUdS	763051-92-9	PF004	4 – 15	0.64 – 1.5
Perfluoro(2-ethoxyethane)sulfonic acid	PFEESA	113507-82-7	52629	2 – 8	0.32 – 0.7
Fluorotelomer carboxylic acids					
3-Perfluoropropyl propanoic acid	3:3 FTCA	356-02-5	PF001	5 – 20	0.80 – 5
2H,2H,3H,3H-Perfluorooctanoic acid	5:3 FTCA	914637-49-3	PF007	25 – 100	4 – 10
3-Perfluoroheptyl propanoic acid	7:3 FTCA	812-70-4	PF005	25 – 100	4 – 10

Special Condition No 13. PFAS Minimization Program:

1) PFAS Reduction Initiative:

   a) Within 6 months from the effective date of the permit the Permittee shall develop and implement a PFAS reduction initiative. The reduction initiative must include Best Management Practices (BMPs).

   b) Best Management Practices (BMPs) must include an evaluation based on product substitution, reduction, or elimination of PFAS in discharges as detected by USEPA Method 1633A, or methods approved under 40 CFR Part 136, once finalized. When developing a BMP, the following should be considered, at a minimum:

      i) Evaluation of the potential for the industrial facility to use products containing PFAS or have knowledge or suspect wastewater being discharged to the sewer system.

      ii) Evaluation of Pollution prevention/source reduction opportunities which may include:

         (1) Product elimination or substitution when a reasonable alternative to using PFAS is available in the industrial process,

         (2) Accidental discharge minimization by optimizing operations and good housekeeping practices,

         (3) Equipment decontamination or replacement (such as in metal finishing facilities) where PFAS products have historically been used to prevent discharge of legacy PFAS following the implementation of product substitution.

      iii) Identification of the measures being taken to reduce PFAS loading from the facility, and any available information, including facility wastewater testing for PFAS, and/or the loading reduction achieved.

   c) BMPs for PFAS must be reevaluated in accordance with paragraph 1 b) of this Special Condition and updated on an annual basis.

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The reevaluated BMP's must include any updates made since the previous BMP was submitted.

d) The Permittee is required to submit a PFAS reduction report annually to the Illinois Environmental Protection Agency at the address indicated under paragraph 2) of this Special Condition, with the first report due 12 months from the permit effective date. Subsequent annual reports shall be due 12 months following the previous report's due date.

PFAS reduction reports must include the following information:

i) The name, address, and NPDES permit number of the Permittee,

ii) The current BMP for the facility. Reevaluated BMP's must also include all updates made since the previous BMP was submitted.

2) The Permittee shall submit the PFAS reduction reports identified under paragraphs 1) of this Special Condition electronically or in writing to one of the following addresses:

a) EPA.PrmtSpecCondtns@illinois.gov, or

b) Illinois Environmental Protection Agency
Bureau of Water
Compliance Assurance Section
Mail Code #19
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62794-9276

Special Condition No 14. Cooling Water Intake Structure.

Based on available information, the Agency has determined that the operation of the cooling water intake structure must meet the equivalent of Best Technology Available (BTA) in accordance with the Best Professional Judgment provisions of 40 CFR 125.3 and 40 CFR 125.90(b), based on information available at the time of permit reissuance.

The Permittee shall comply with the requirements of the Cooling Water Intake Structure Existing Facilities Rule as found at 40 CFR 122 and 125. Any application materials and submissions required for compliance with the Existing Facilities Rule, shall be submitted to the Agency no later than 4 years from the effective date of this permit.

If for any reason, the Cooling Water Intake Structure Existing Facilities Rule is stayed or remanded by the courts, the Permittee shall comply with the requirements below. The information required below is necessary to further evaluate cooling water intake structure operations based on the most up to date information, in accordance with the Best Professional Judgment provisions of 40 CFR 125.3 and 40 CFR 125.90(b):

A. The permittee shall submit the following information/studies within 4 years of the effective date of the permit:

1. Source Water Physical Data to include:

a) A narrative description and scaled drawings showing the physical configuration of all source water bodies used by the facility including aerial dimensions, depths, salinity and temperature regimes;
b) Identification and characterization of the source waterbody's hydrological and geomorphological features, as well as the methods used to conduct any physical studies to determine the intake's area of influence and the results of such studies; and
c) Location maps.

2. Source Waterbody Flow Information

The permittee shall provide the annual mean flow of the waterbody, any supporting documentation and engineering calculations to support the analysis of whether the design intake flow is greater than five percent of the mean annual flow of the river or stream for purposes of determining applicable performance standards. Representative historical data (from a period of time up to 10 years) shall be used, if available.

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3. Impingement Mortality and Entrainment Characterization Study

The permittee shall submit an Impingement Mortality and Entrainment Characterization Study whose purpose is to provide information to support the development of a calculation baseline for evaluating impingement mortality and entrainment and to characterize current impingement mortality and entrainment. The Study shall include the following in sufficient detail to support establishment of baseline conditions:

a) Taxonomic identification of all life stages of fish and shellfish and any species protected under Federal, State, or Tribal law (including threatened or endangered species) that are in the vicinity of the cooling water intake structure(s) and are susceptible to impingement and entrainment;
b) A characterization of all life stages of fish and shellfish, and any species protected under Federal, or State law, including a description of the abundance and temporal and spatial characteristics in the vicinity of the cooling water intake structure(s). These may include historical data that are representative of the current operation of the facility and of biological conditions at the site; and
c) Documentation of the current impingement mortality and entrainment of all life stages of fish, shellfish, and any species protected under Federal , State, or Tribal Law (including threatened or endangered species) and an estimate of impingement mortality and entrainment to be used as the calculation baseline. The documentation may include historical data that are representative of the current operation of the facility and of biological conditions at the site. Impingement mortality and entrainment samples to support the calculations required must be collected during periods of representative operational flows for the cooling water intake structure and the flows associated with the samples must be documented.

The Permittee shall submit the documentation identified under this Special Condition electronically or in writing to one of the following addresses:

a. EPA.PrmtSpecCondtns@Illinois.gov, or
b. Illinois Environmental Protection Agency
Bureau of Water
Compliance Assurance Section
Mail Code #19
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62794-9276

B. The permittee shall comply with the following requirements:

1. At all times properly operate and maintain the intake equipment as demonstrated in the application material supporting the BTA determination.
2. Inform IEPA of any proposed changes to the cooling water intake structure or proposed changes to operations at the facility that affect impingement mortality and/or entrainment.
3. Debris collected on intake screens is prohibited from being discharged back to the canal. Debris does not include living fish or other living aquatic organisms.
4. Compliance Alternatives. The permittee must evaluate each of the following alternatives for establishing best available technology for minimizing adverse environmental impacts at the facility due to operation of the intake structure:

    a) Evaluate operational procedures and/or propose facility modifications to reduce the intake through-screen velocity to less than 0.5 ft/sec. The operational evaluation may consider modified circulating water pump operation; reduced flow associated with capacity utilization, recalculation or determination of actual total water withdrawal capacity. The evaluation report and any implementation plan for the operational changes and/ or facility modification shall be submitted to the Agency with the renewal application for this permit.
    b) Complete a fish impingement and entrainment mortality minimization alternatives evaluation. The evaluation may include an assessment of modification of the traveling screens, consideration of a separate fish and debris return system and include time frames and cost analysis to implement these measures. The evaluation report and implementation plan for any operational changes and/ or facility modifications shall be submitted to the Agency with the renewal application for this permit.

C. All required reports shall be submitted to the Industrial Unit, Permit Section and Compliance Assurance Section at the address stated above

This special condition does not relieve the permittee of the responsibility of complying with any other laws, regulations, or judicial orders issued pursuant to Section 316(b) of the Clean Water Act.

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Attachment H

Standard Condition

Definitions

Act means the Illinois Environmental Protection Act, 415 ILCS 5 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 measurements, 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 requirements.

(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 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 and 40 CFR 122.63. 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 or USEPA (including an authorized contractor acting as a representative of the Agency or USEPA), 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

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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. Records related to the permittee's sewage sludge use and disposal activities shall be retained for a period of at least five years (or longer as required by 40 CFR Part 503). This period may be extended by request of the Agency or USEPA 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.

(c) **Changes of Authorization.** If an authorization under (b) is no longer 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.

(d) **Certification.** Any person signing a document under paragraph (a) or (b) of this section shall make the following certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

(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.

Notice is required when:

(1) The alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source pursuant to 40 CFR 122.29 (b); or

(2) The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification applies to pollutants which are subject neither to effluent limitations in the permit, nor to notification requirements pursuant to 40 CFR 122.42 (a)(1).

(3) The alteration or addition results in a significant change in the permittee's sludge use or disposal practices, and such alteration, addition, or change may justify the application of permit conditions that are different from or absent in the existing permit, including notification of additional use or disposal sites not reported during the permit application process or not reported pursuant to an approved land application plan.

(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) **Transfers.** This permit is not transferable to any person except after notice to the Agency.

(d) **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.

(e) **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.

(f) **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 time; 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 reoccurrence 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

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limitation in the permit.

(2) Any upset which exceeds any effluent limitation in the permit.

(3) Violation of a maximum daily discharge limitation for any of the pollutants listed by the Agency in the permit or any pollutant which may endanger health or the environment. The Agency may waive the written report on a case-by-case basis if the oral report has been received within 24-hours.

(g) **Other noncompliance.** The permittee shall report all instances of noncompliance not reported under paragraphs (12) (d), (e), or (f), at the time monitoring reports are submitted. The reports shall contain the information listed in paragraph (12) (f).

(h) **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) **Bypass.**

(a) Definitions.

(1) Bypass means the intentional diversion of waste streams from any portion of a treatment facility.

(2) Severe property damage means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

(b) Bypass not exceeding limitations. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of paragraphs (13)(c) and (13)(d).

(c) Notice.

(1) Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least ten days before the date of the bypass.

(2) Unanticipated bypass. The permittee shall submit notice of an unanticipated bypass as required in paragraph (12)(f) (24-hour notice).

(d) Prohibition of bypass.

(1) Bypass is prohibited, and the Agency may take enforcement action against a permittee for bypass, unless:

(i) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

(ii) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and

(iii) The permittee submitted notices as required under paragraph (13)(c).

(2) The Agency may approve an anticipated bypass, after considering its adverse effects, if the Agency determines that it will meet the three conditions listed above in paragraph (13)(d)(1).

(14) **Upset.**

(a) Definition. Upset means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

(b) Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with such technology based permit effluent limitations if the requirements of paragraph (14)(c) are met. No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review.

(c) Conditions necessary for a demonstration of upset. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An upset occurred and that the permittee can identify the cause(s) of the upset;

(2) The permitted facility was at the time being properly operated; and

(3) The permittee submitted notice of the upset as required in paragraph (12)(f)(2) (24-hour notice).

(4) The permittee complied with any remedial measures required under paragraph (4).

(d) Burden of proof. In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof.

(15) **Transfer of permits.** Permits may be transferred by modification or automatic transfer as described below:

(a) Transfers by modification. Except as provided in paragraph (b), a permit may be transferred by the permittee to a new owner or operator only if the permit has been modified or revoked and reissued pursuant to 40 CFR 122.62 (b) (2), or a minor modification made pursuant to 40 CFR 122.63 (d), to identify the new permittee and incorporate such other requirements as may be necessary under the Clean Water Act.

(b) Automatic transfers. As an alternative to transfers under paragraph (a), any NPDES permit may be automatically transferred to a new permittee if:

(1) The current permittee notifies the Agency at least 30 days in advance of the proposed transfer date;

(2) The notice includes a written agreement between the existing and new permittees containing a specified date for transfer of permit responsibility, coverage and liability between the existing and new permittees; and

(3) 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.

(16) 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);

(2) Two hundred micrograms per liter (200 ug/l) for acrolein and 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.

(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.

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(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.

(17) 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 discharge 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.

(18) 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:
(a) User charges pursuant to Section 204 (b) of the Clean Water Act, and applicable regulations appearing in 40 CFR 35;
(b) Toxic pollutant effluent standards and pretreatment standards pursuant to Section 307 of the Clean Water Act; and
(c) Inspection, monitoring and entry pursuant to Section 308 of the Clean Water Act.

(19) 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 reissued to conform to that effluent standard or limitation.

(20) 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.

(21) 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.

(22) The Clean Water Act provides that any person who violates a permit condition implementing Sections 301, 302, 306, 307, 308, 318, or 405 of the Clean Water Act is subject to a civil penalty not to exceed $25,000 per day of such violation. Any person who willfully or negligently violates permit conditions implementing Sections 301, 302, 306, 307, 308, 318 or 405 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. Additional penalties for violating these sections of the Clean Water Act are identified in 40 CFR 122.41 (a)(2) and (3).

(23) 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 this permit shall, upon conviction, be punished by a fine of not more than $10,000, or by imprisonment for not more than 2 years, or both. If a conviction of a person is for a violation committed after a first conviction of such person under this paragraph, punishment is a fine of not more than $20,000 per day of violation, or by imprisonment of not more than 4 years, or both.

(24) 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, 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.

(25) Collected screening, slurries, 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.

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

(27) 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 or any court with jurisdiction.

(28) 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.

(Rev. 7-9-2010 bah)

EXHIBIT D

Electronic Filing: Received, Clerk's Office 10/27/2026

NPDES Permit No. IL0000329
Notice No. YA:26010601.docx

United States Steel Corporation – Granite City Works
1951 State Street
Granite City, Illinois 62040

Via Certified Mail and email

May 29, 2026

Illinois Environmental Protection Agency
Bureau of Water
Division of Water Pollution Control
Permit Section
2520 West Iles Avenue
P.O. Box 19276
Springfield, Illinois 62794-9276
217/782-0610

RE: United States Steel Corporation – Granite City Works
NPDES Permit No. IL0000329
Public Draft Comments

Dear Mr. Alkola:

On May 1, 2026, the United States Steel Corporation – Granite City Works (U. S. Steel) Draft Reissuance NPDES Permit #IL0000329 was placed on Public Notice. Please accept this letter as U. S. Steel's comments to the draft permit and fact sheet.

If you have any questions or would like to discuss via a conference call, please contact Jake Springman at (618) 451-3459 or JSpringman@uss.com.

Sincerely,

Alexis Piscitelli
Environmental Director
U. S. Steel – Granite City Works, Gary Works, Midwest Plant and Great Lakes Works
Office: (313) 749-3900
Email: Apiscitelli@uss.com

Electronic Filing: Received, Clerk's Office 10/27/2026

Granite City Works
NPDES Permit No. IL0000329
Draft Permit Public Comments
5/29/2026

1. **Issue: Special Condition 12: PFAS Testing and Reporting, item 5.**

   Reference: Permit Pages 6

   U. S. Steel Position: If sampling shows that source water contains PFAS, the permittee should be able to show no increase in contribution from influent sources of PFAS in its outfall. That should in turn warrant a reduction and removal of sampling.

   Requested Change: Changes in permit language in RED below:
   '5) If sample results for PFAS at the discharges are consistently equal to or below the levels observed in the source water, or the discharge PFAS levels are below the minimum level (ML) of quantification…'

2. **Issue: Special Condition 12: PFAS Testing and Reporting, item 5.**

   Reference: Permit pages: 6

   U. S. Steel Position: Four consecutive samples are more than enough data to request a reduction in monitoring.

   Requested Change: Changes in permit language in RED below:
   '5) …for ~~two~~ four consecutive samples ~~years~~ using USEPA Method 1633A or methods approved under 40 CFR Part 136, once finalized, the permitee may request a reevaluation of the testing requirements. Documents supporting the request for a reduction in monitoring for PFAS must be made by the permitee as a supplemental permit request.

3. **Issue: Special Condition 13: PFAS Minimization Program**

   Reference: Permit pages: 10

   U. S. Steel Position: A PFAS reduction initiative should only be applicable to permittees that utilize and introduce PFAS to their products and processes, or if samples of the discharge indicate PFAS at higher levels than from the source water. U. S. Steel's Granite City facility does not knowingly or intentionally add PFAS- containing substances to its manufacturing processes. Therefore, it should not be required to develop and

implement a PFAS reduction initiative, as such an initiative would be unnecessarily burdensome and meaningless.

Requested Change: Changes in permit language are in RED below:

1) PFAS Reduction Initiative: a) If four consecutive samples of the Permittee's discharge indicate PFAS above the levels observed in the source water, or the discharge PFAS levels are above the minimum level (ML) of quantification, Permittee shall develop and implement a PFAS reduction initiative within 6 months of receipt of its fourth consecutive sample above such levels.

4. **Issue: Special Condition 14: Cooling Water Intake Structure**

Reference: Permit pages: 10, 11

U. S. Steel Position: Information submitted in the NPDES application supports a BTA determination for Granite City's cooling water intake structure. Since none of the water being drawn from the waters of the United States is being used exclusively for cooling purposes as required by 40 CFR Part 125.92, 316(b) regulations do not apply. The facility not only utilizes facility wide recycle system (which is BTA) but also uses less than 25% of the intake water for cooling purposes. The facility is in compliance with CWIS requirements, and no further action is needed.

Requested Change: Remove Special Condition 14.A.3 that requires impingement and entrainment studies.

5. **Issue: Special Condition 14: Cooling Water Intake Structure**

Reference: Permit pages: 10, 11

U. S. Steel Position: Information submitted in the NPDES application supports a BTA determination for Granite City's cooling water intake structure. Since none of the water being drawn from the waters of the United States is being used exclusively for cooling purposes as required by 40 CFR Part 125.92, 316(b) regulations do not apply. The facility not only utilizes facility wide recycle system (which is BTA), but also uses less than 25% of the intake water for cooling purposes. The facility is in compliance with CWIS requirements, and no further action is needed.

Requested Change: Remove Special Condition 14.B.4 that requires compliance alternative evaluation.

EXHIBIT E

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Illinois Environmental Protection Agency

2520 West Iles Avenue • P.O. Box 19276 • Springfield, Illinois • 62794-9276 • 217-782-3397

JB Pritzker, Governor **James Jennings**, Acting Director

United States Steel Corporation
1951 State Street
Granite City, Illinois 62040

217/782 0610

JUN 2 4 2026

Re: United States Steel Corporation – Granite City Works
NPDES Permit No. IL0000329
Bureau ID: W1198130003
Final Permit

Permittee:

Attached is the final NPDES Permit for your discharge. The Permit as issued covers discharge limitations, monitoring, and reporting requirements. Failure to meet any portion of the Permit could result in civil and/or criminal penalties. The Illinois Environmental Protection Agency is ready and willing to assist you in interpreting any of the conditions of the Permit as they relate specifically to your discharge

In reference to the comments in email dated June 10, 2026, the Agency offers the following response:

1. In response to the comment received on the 316(b) requirements: The Agency's decision to include Section 316(b) language in the permit is based on the facility's withdrawal of water from waters of the United States through a water intake structure and the facility's use of that water for cooling-related purposes.

   Based on the information currently available to the Agency, the facility's use of a recycle water system and its interpretation of 40 CFR §125.92 do not provide clear evidence that the facility is exempt from the applicability of Section 316(b) requirements. Furthermore the information submitted to date does not clearly demonstrate that less than 25 percent of the intake flow is used for cooling purposes.

Pursuant to the Final NPDES Electronic Reporting Rule, all permittees must report DMRs electronically unless a waiver has been granted by the Agency. The Agency utilizes NetDMR, a web based application, which allows the submittal of electronic Discharge Monitoring Reports instead of paper Discharge Monitoring Reports (DMRs). More information regarding NetDMR can be found on the Agency website, http://epa.state.il.us/water/net-dmr/index.html. If your facility has received a waiver from the NetDMR program, a supply of preprinted paper DMR Forms will be sent to your facility. Additional information and instructions will accompany the preprinted DMRs. Please see the attachment regarding the electronic reporting rule.

The attached Permit is effective as of the date indicated on the first page of the Permit. Until the effective date of any re-issued Permit, the limitations and conditions of the previously-issued Permit remain in full effect. You have the right to appeal any condition of the Permit to the Illinois Pollution Control Board within a 35 day period following the issuance date.

Illinois Environmental Protection Agency
2520 West Iles Avenue • P.O. Box 19276 • Springfield, Illinois • 62794-9276 • 217-782-3397

JB Pritzker, Governor **James Jennings**, Acting Director

Should you have questions concerning the Permit, please contact Yousif Alkola at 217/558-8143.

Sincerely,

Stephen F. Nightingale, P.E.
Manager, Industrial Unit, Permit Section
Division of Water Pollution Control

SFN:YA: 26010601.docx

Attachment: Final Permit

cc: Records
Compliance Assurance Section
Collinsville Region
Billing

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NPDES Permit No. IL0000329

Illinois Environmental Protection Agency

Division of Water Pollution Control

2520 West Iles Avenue

Post Office Box 19276

Springfield, Illinois 62794-9276

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

Reissued (NPDES) Permit

Expiration Date: June 30, 2031

Issue Date: June 24, 2026
Effective Date: July 1, 2026

Name and Address of Permittee:

United States Steel Corporation
Granite City Works
1951 State Street
Granite City, Illinois 62040

Facility Name and Address:

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

Discharge Number and Name:

001	Treated Process Wastewater
B01	Cold Rolling Mill Wastewater
C01	Landfill Leachate Wastewater

Receiving Waters:

Horseshoe Lake
Internal Outfall
Internal Outfall

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.

Stephen F. Nightingale, P.E.
Manager, Industrial Unit, Permit Section
Division of Water Pollution Control

SFN:YA:26010601.docx

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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 – (DAF = 25.0 MGD)

Treated Process Wastewater consists of wastewater from the blast furnace, basic oxygen furnace, 80" hot strip mill, landfill leachates, galvanizing lines, sanitary, stormwater runoff, continuous casters, boiler blowdown, maintenance shops, laboratories, cold mill, continuous pickler, and miscellaneous flows

	LOAD LIMITS lbs/day DAF (DMF)		CONCENTRATION LIMITS mg/l			
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM	SAMPLE FREQUENCY	SAMPLE TYPE
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	1/Week	Composite
Total Suspended Solids	2502	5004	12	24	1/Week	Composite
Oil & Grease	1511	3492	15	30	1/Week	Grab
Iron (total)	417	834	2	4	1/Month	Composite
Iron (dissolved)		209		1	1/Month	Composite
Lead (total)	5.3	16	0.09	0.4	1/Quarter	Composite
Zinc (total)	12	33	0.17	0.96	2/Week	Composite
Cyanide (total)	19	35	0.1	0.2	2/Month	Composite
Cyanide (available by OIA 1677)	1.1	4.6	0.0052	0.022	2/Month	Composite
Phenol (4AAP)	5.0	10		0.1	1/Week	Composite
Fluoride		834		4	1/Week	Composite
Ammonia-Nitrogen*						
Spring/Fall	521	2585	2.5	12.4	1/Week	Composite
Summer	479	3128	2.3	15.0	1/Week	Composite
Winter	834	1188	4.0	5.7	1/Week	Composite
March	688	1188	3.3	5.7	1/Week	Composite
Phosphorus				Monitor Only	1/Quarter	Grab
PFAS**				Report	**	**
PFAS Sum**		**		**	**	**
Tetrachloroethylene				Monitor Only	2/Year	Grab
Naphthalene				Monitor Only	1/Quarter	Grab

*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 6.2 mg/L (1292 lb/day). Summer weekly average limit is 5.7 mg/L (1188 lb/day). There is no weekly average limit for Winter or March.

** See Special Condition 12

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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): B01, C01

PARAMETER	LOAD LIMITS lbs/day DAF (DMF) 30 DAY AVERAGE	LOAD LIMITS lbs/day DAF (DMF) DAILY MAXIMUM	CONCENTRATION LIMITS mg/l 30 DAY AVERAGE	CONCENTRATION LIMITS mg/l DAILY MAXIMUM	SAMPLE FREQUENCY	SAMPLE TYPE
Outfall: B01 - Cold Rolling Mill Wastewater						
Flow (MGD)	See Special Condition 1				When Monitoring	Measure
Tetrachloroethylene		1.1			2/Year	Grab
Naphthalene		0.69			1/Quarter	Grab
Outfall: C01 - Landfill Leachate Wastewater						
Flow (MGD)	See Special Condition 1				Continuous	Measure

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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:

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

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) electronic forms using one such form for each outfall each month.

In the event that an outfall does not discharge during a monthly reporting period, the DMR Form shall be submitted with no discharge indicated.

The Permittee will be required to submit electronic DMRs (NetDMRs) instead of mailing paper DMRs to the IEPA beginning December 21, 2016. More information, including registration information for the NetDMR program, can be obtained on the IEPA website, http://www.epa.state.il.us/water/net-dmr/index.html.

The completed Discharge Monitoring Report forms shall be submitted to IEPA no later than the 25th day of the following month, unless otherwise specified by the permitting authority.

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NPDES Permit No. IL0000329

Special Conditions

Permittees that have been granted a waiver shall mail Discharge Monitoring Reports with an original signature to the IEPA at the following address:

Illinois Environmental Protection Agency
Division of Water Pollution Control
Attention: Compliance Assurance Section, Mail Code # 19
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62794-9276

SPECIAL CONDITION 8. 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 9. The Agency has determined that the effluent limitations in this permit constitute BAT/BCT for storm water which is treated in the existing treatment facilities for purposes of this permit reissuance, and no pollution prevention plan will be required for such storm water. In addition to the chemical specific monitoring required elsewhere in this permit, the permittee shall conduct an annual inspection of the facility site to identify areas contributing to a storm water discharge associated with industrial activity, and determine whether any facility modifications have occurred which result in previously-treated storm water discharges no longer receiving treatment. If any such discharges are identified the permittee shall request a modification of this permit within 30 days after the inspection. Records of the annual inspection shall be retained by the permittee for the term of this permit and be made available to the Agency on request.

SPECIAL CONDITION 10. The Permittee shall monitor the effluent from Outfall 001 for the following parameters on a 2/year basis. This Permit may be modified with public notice to establish effluent limitations if appropriate, based on information obtained through sampling. The sample shall be a 24-hour effluent composite except as otherwise specifically provided below and the results shall be submitted on the DMR's to IEPA. The parameters to be sampled and the minimum reporting limits to be attained are as follows:

STORET CODE	PARAMETER	Minimum reporting limit
10197	Antimony	5.0 ug/L
01002	Arsenic	0.05 mg/L
01007	Barium	0.5 mg/L
01027	Cadmium	0.001 mg/L
01032	Chromium (Hexavalent) (grab)	0.01 mg/L
01034	Chromium (total)	0.05 mg/L
01042	Copper	0.005 mg/L
01055	Manganese	0.5 mg/L
71900	Mercury	0.2 ug/L
01067	Nickel	0.005 mg/L
01147	Selenium	0.005 mg/L
01077	Silver (total)	0.003 mg/L

Unless otherwise indicated, concentrations refer to the total amount of the constituent present in all phases, whether solid, suspended or dissolved, elemental or combined, including all oxidation states.

The analyses for the above parameters shall meet the detection limits as established for accepted test procedures listed in 40 CFR 136.

All samples for mercury must be analyzed by EPA Method 1631E using the digestion procedure described in Section 11.1.1.2 of 1631E, which dictates that samples must be heated at 50°C for 6 hours in a bromine chloride (BrCl) solution in closed vessels.

SPECIAL CONDITION 11: This Permit may be modified to include alternative or additional final effluent limitations pursuant to an approved Total Maximum Daily Load (TMDL) Study or upon approval of an alternate Water Quality Study.

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NPDES Permit No. IL0000329

Special Conditions

Special Condition 12. PFAS Testing and Reporting

1) PFAS Sample Frequency and Type of Sample.

Sampling Point	Sample Frequency	Sample Type	Report****
Effluent	Quarterly**	Grab***	ng/L

** Quarterly sampling – Testing done during the first quarter (January – March) must be reported on the May Electronic Discharge Monitoring Report (NetDMR), testing done in the second quarter (April – June) must be reported on the August NetDMR, testing done in the third quarter (July – September) must be reported on the November NetDMR, and testing done in the fourth quarter (October – December) must be reported on the February NetDMR.

*** If the permittee prefers to collect composite samples instead grab samples, the permittee will be required to seek approval through the permit modification process.

**** The Minimum Level (ML) of quantification established for PFAS by the laboratory, when using the approved analytical method, shall be submitted with the test results each reporting period on the NetDMR.

2) Test results must be reported in nanograms per liter (ng/L) as a daily maximum concentration for aqueous samples. Solid test results must be reported in nanograms per gram (ng/g) as a daily maximum.

3) USEPA Method 1633A - Analysis of Per- and Polyfluoroalkyl Substances (PFAS) in Aqueous, Solid, Biosolids, and Tissue Samples by LC-MS/MS (finalized December 2024) is to be used when testing for PFAS. When PFAS analytical methods are promulgated through rulemaking and incorporated into 40 CFR Part 136, the permittee shall follow the approved methods.

4) When testing for PFAS the laboratory shall determine their limit of quantitation (LOQ) for each analyte in accordance with the test method identified in Part 3 of this Special Condition. The LOQ is synonymous with Minimum Level (ML) and Reporting Limit. The laboratory LOQs (Minimum Levels) must not exceed the upper limit of the aqueous and solid ranges listed in the table in Part 7 of this Special Condition.

5) In addition to the testing and reporting requirements for the individual PFAS analytes listed on Part 7 of this Special Condition the permittee shall report the PFAS Sum. For purposes of this permit the PFAS Sum is the arithmetic summation of the individual analytes listed in Part 7 that are associated with a particular sampling event and location. Results must be submitted on the Net DMRs along with the individual test results.

   Test results for individual analytes which are below the ML as described in Parts 1 and 4 of this Special Condition should be assigned a value of zero (0) when calculating the PFAS Sum.

6) If sample results for PFAS are consistently below the minimum level (ML) of quantification for two consecutive years using USEPA Method 1633A or methods approved under 40 CFR 136, once finalized, the permittee may request a reevaluation of the testing requirements. Documentation supporting the request for a reduction in monitoring for PFAS must be made by the permittee as a permit modification request.

7) Specific PFAS constituents that must be analyzed for are listed in the following table:

Special Conditions

Target Analyte Name	Abbreviation	CASRN Number	STORET	Minimum Level (ML)	
				Aqueous (ng/L)	Solid (ng/g)
Perfluoroalkyl carboxylic acids					
Perfluorobutanoic acid	PFBA	375-22-4	51522	4 – 16	0.64 – 1.6
Perfluoropentanoic acid	PFPeA	2706-90-3	51623	2 – 8	0.32 – 0.8
Perfluorohexanoic acid	PFHxA	307-24-4	51624	1 – 4	0.16 – 0.4
Perfluoroheptanoic acid	PFHpA	375-85-9	51625	1 – 4	0.16 – 0.4
Perfluorooctanoic acid	PFOA	335-67-1	51521	1 – 4	0.16 – 0.4
Perfluorononanoic acid	PFNA	375-95-1	51626	1 – 4	0.16 – 1.3
Perfluorodecanoic acid	PFDA	335-76-2	51627	1 – 4	0.16 – 0.4
Perfluoroundecanoic acid	PFUnA	2058-94-8	51628	1 – 4	0.16 – 0.5
Perfluorododecanoic acid	PFDoA	307-55-1	51629	1 – 4	0.16 – 0.4
Perfluorotridecanoic acid	PFTrDA	72629-94-8	51630	1 – 4	0.16 – 0.4
Perfluorotetradecanoic acid	PFTeDA	376-06-7	51631	1 – 4	0.16 – 0.4
Perfluoroalkyl sulfonic acids					
Acid Form					
Perfluorobutanesulfonic acid	PFBS	375-73-5	52602	1 – 4	0.16 – 0.4
Perfluoropentanesulfonic acid	PFPeS	2706-91-4	52610	1 – 4	0.16 – 0.4
Perfluorohexanesulfonic acid	PFHxS	355-46-4	52605	1 – 4	0.16 – 0.4
Perfluoroheptanesulfonic acid	PFHpS	375-92-8	52604	1 – 4	0.16 – 0.4
Perfluorooctanesulfonic acid	PFOS	1763-23-1	52606	1 – 4	0.16 – 0.4
Perfluorononanesulfonic acid	PFNS	68259-12-1	52611	1 – 4	0.16 – 0.4
Perfluorodecanesulfonic acid	PFDS	335-77-3	52603	1 – 4	0.16 – 0.4
Perfluorododecanesulfonic acid	PFDoS	79780-39-5	52632	1 – 4	0.16 – 0.4
Fluorotelomer sulfonic acids					

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1H,1H,2H,2H-Perfluorohexane sulfonic acid	4:2 FTS	757124-72-4	52607	4 – 15	0.64 – 1.5
1H,1H,2H,2H-Perfluorooctane sulfonic acid	6:2 FTS	27619-97-2	52608	4 – 15	0.64 – 1.5
1H,1H, 2H, 2H-Perfluorodecane sulfonic acid	8:2 FTS	39108-34-4	52609	4 – 15	0.64 – 1.5
Perfluorooctane sulfonamides					
Perfluorooctanesulfonamide	PFOSA	754-91-6	51525	1 – 4	0.16 – 0.4
N-methyl perfluorooctanesulfonamide	NMeFOSA	31506-32-8	52641	1 – 4	0.16 – 0.4
N-ethyl perfluorooctanesulfonamide	NEtFOSA	4151-50-2	52642	1 – 4	0.16 – 0.4
Perfluorooctane sulfonamidoacetic acids					
N-methyl perfluorooctanesulfonamidoacetic acid	NMeFOSAA	2355-31-9	51644	1 – 4	0.16 – 0.4
N-ethyl perfluorooctanesulfonamidoacetic acid	NEtFOSAA	2991-50-6	51643	1-4	0.16 – 0.4
Perfluorooctane sulfonamide ethanols					
N-methyl perfluorooctanesulfonamidoethanol	NMeFOSE	24448-09-7	51642	10 – 40	1.6 – 4
N-ethyl perfluorooctanesulfonamidoethanol	NEtFOSE	1691-99-2	51641	10 – 40	1.6 – 4
Per- and Polyfluoroether carboxylic acids					
Hexafluoropropylene oxide dimer acid	HFPO-DA	13252-13-6	52612	2 – 8	0.64 – 1.6
4,8-Dioxa-3H-perfluorononanoic acid	ADONA	919005-14-4	52636	2 – 8	0.64 – 1.5
Perfluoro-3-methoxypropanoic acid	PFMPA	377-73-1	PF002	4 – 16	0.32 – 0.8
Perfluoro-4-methoxybutanoic acid	PFMBA	863090-89-5	PF006	4 – 15	0.32 – 0.8
Nonafluoro-3,6-dioxaheptanoic acid	NFDHA	151772-58-6	52626	2 – 7	0.32 –0.8
Ether sulfonic acids					
9-Chlorohexadecafluoro-3-oxanonane-1- sulfonic acid	9Cl-PF3ONS	756426-58-1	PF003	4 – 15	0.64 – 1.5
11-Chloroeicosafluoro-3-oxaundecane-1- sulfonic acid	11Cl-PF3OUdS	763051-92-9	PF004	4 – 15	0.64 – 1.5

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Perfluoro(2-ethoxyethane)sulfonic acid	PFEESA	113507-82-7	52629	2 – 8	0.32 – 0.7
Fluorotelomer carboxylic acids					
3-Perfluoropropyl propanoic acid	3:3 FTCA	356-02-5	PF001	5 – 20	0.80 – 5
2H,2H,3H,3H-Perfluorooctanoic acid	5:3 FTCA	914637-49-3	PF007	25 – 100	4 – 10
3-Perfluoroheptyl propanoic acid	7:3 FTCA	812-70-4	PF005	25 – 100	4 – 10

Special Condition No 13. PFAS Minimization Program:

1) PFAS Reduction Initiative:

   a) Within 6 months from the effective date of the permit the Permittee shall develop and implement a PFAS reduction initiative. The reduction initiative must include Best Management Practices (BMPs).

   b) Best Management Practices (BMPs) must include an evaluation based on product substitution, reduction, or elimination of PFAS in discharges as detected by USEPA Method 1633A, or methods approved under 40 CFR 136, once finalized. When developing a BMP, the following should be considered, at a minimum:

      i) Evaluation of the potential for the industrial facility to use products containing PFAS or have knowledge or suspect wastewater being discharged under the NPDES permit to contain PFAS.

      ii) Evaluation of Pollution prevention/source reduction opportunities which may include:

         (1) Product elimination or substitution when a reasonable alternative to using PFAS is available in the industrial process,

         (2) Accidental discharge minimization by optimizing operations and good housekeeping practices,

         (3) Equipment decontamination or replacement (such as in metal finishing facilities) where PFAS products have historically been used to prevent discharge of legacy PFAS following the implementation of product substitution.

      iii) Identification of the measures being taken to reduce PFAS loading from the facility, and any available information, including facility wastewater testing for PFAS, and/or the loading reduction achieved.

   c) BMPs for PFAS must be reevaluated in accordance with paragraph 1 b) of this Special Condition and updated on an annual basis. The reevaluated BMP's must include any updates made since the previous BMP was submitted.

   d) The Permittee is required to submit a PFAS reduction report annually to the Illinois Environmental Protection Agency at the address indicated under paragraph 2) of this Special Condition, with the first report due 12 months from the permit effective date. Subsequent annual reports shall be due 12 months following the previous report's due date.

      PFAS reduction reports must include the following information:

      i) The name, address, and NPDES permit number of the Permittee,

      ii) The current BMP for the facility. Reevaluated BMP's must also include all updates made since the previous BMP was submitted.

2) The Permittee shall submit the PFAS reduction reports identified under paragraphs 1) of this Special Condition electronically or in writing to one of the following addresses:

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a) EPA.PrmtSpecCondtns@Illinois.gov, or

b) Illinois Environmental Protection Agency
Bureau of Water
Compliance Assurance Section
Mail Code #19
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62794-9276

Special Condition No 14. Cooling Water Intake Structure.

Based on available information, the Agency has determined that the operation of the cooling water intake structure must meet the equivalent of Best Technology Available (BTA) in accordance with the requirements under 40 CFR §§ 125.94 through 125.99.

The Permittee shall comply with the requirements of the Cooling Water Intake Structure Existing Facilities Rule as found at 40 CFR 122 and 125. Any application materials and submissions required for compliance with the Existing Facilities Rule, shall be submitted to the Agency no later than 4 years from the effective date of this permit.

The Permittee shall comply with the requirements below. The information required below is necessary to further evaluate cooling water intake structure operations based on the most up to date information, in accordance with the requirements under 40 CFR §§ 125.94 through 125.99:

A. The permittee shall submit the following information/studies within 4 years of the effective date of the permit:

1. Source Water Physical Data to include:

a) A narrative description and scaled drawings showing the physical configuration of all source water bodies used by the facility including aerial dimensions, depths, salinity and temperature regimes;
b) Identification and characterization of the source waterbody's hydrological and geomorphological features, as well as the methods used to conduct any physical studies to determine the intake's area of influence and the results of such studies; and
c) Location maps.

2. Source Waterbody Flow Information

The permittee shall provide the annual mean flow of the waterbody, any supporting documentation and engineering calculations to support the analysis of whether the design intake flow is greater than five percent of the mean annual flow of the river or stream for purposes of determining applicable performance standards. Representative historical data (from a period of time up to 10 years) shall be used, if available.

3. Impingement Mortality and Entrainment Characterization Study

The permittee shall submit an Impingement Mortality and Entrainment Characterization Study whose purpose is to provide information to support the development of a calculation baseline for evaluating impingement mortality and entrainment and to characterize current impingement mortality and entrainment. The Study shall include the following in sufficient detail to support establishment of baseline conditions:

a) Taxonomic identification of all life stages of fish and shellfish and any species protected under Federal, State, or Tribal law (including threatened or endangered species) that are in the vicinity of the cooling water intake structure(s) and are susceptible to impingement and entrainment;
b) A characterization of all life stages of fish and shellfish, and any species protected under Federal, or State law, including a description of the abundance and temporal and spatial characteristics in the vicinity of the cooling water intake structure(s). These may include historical data that are representative of the current operation of the facility and of biological conditions at the site; and
c) Documentation of the current impingement mortality and entrainment of all life stages of fish, shellfish, and any species protected under Federal , State, or Tribal Law (including threatened or endangered species) and an estimate of impingement mortality and entrainment to be used as the calculation baseline. The documentation may include historical data that are representative of the current operation of the facility and of biological conditions at the site. Impingement mortality and entrainment samples to support the calculations required must be collected during periods of representative operational flows for the cooling water intake structure and

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the flows associated with the samples must be documented.

The Permittee shall submit the documentation identified under this Special Condition electronically or in writing to one of the following addresses:

a. EPA.PrmtSpecCondtns@Illinois.gov, or
b. Illinois Environmental Protection Agency
Bureau of Water
Compliance Assurance Section
Mail Code #19
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62794-9276

B. The permittee shall comply with the following requirements:

1. At all times properly operate and maintain the intake equipment as demonstrated in the application material supporting the BTA determination.
2. Inform IEPA of any proposed changes to the cooling water intake structure or proposed changes to operations at the facility that affect impingement mortality and/or entrainment.
3. Debris collected on intake screens is prohibited from being discharged back to the canal. Debris does not include living fish or other living aquatic organisms.
4. Compliance Alternatives. The permittee must evaluate each of the following alternatives for establishing best available technology for minimizing adverse environmental impacts at the facility due to operation of the intake structure:

    a) Evaluate operational procedures and/or propose facility modifications to reduce the intake through-screen velocity to less than 0.5 ft/sec. The operational evaluation may consider modified circulating water pump operation; reduced flow associated with capacity utilization, recalculation or determination of actual total water withdrawal capacity. The evaluation report and any implementation plan for the operational changes and/ or facility modification shall be submitted to the Agency with the renewal application for this permit.
    b) Complete a fish impingement and entrainment mortality minimization alternatives evaluation. The evaluation may include an assessment of modification of the traveling screens, consideration of a separate fish and debris return system and include time frames and cost analysis to implement these measures. The evaluation report and implementation plan for any operational changes and/ or facility modifications shall be submitted to the Agency with the renewal application for this permit.

5. The permittee shall comply with the measures to protect Federally-listed threatened and endangered species and designated critical habitat in accordance with 40 CFR 125.94(g).

C. All required reports shall be submitted to the Industrial Unit, Permit Section and Compliance Assurance Section at the address stated above

This special condition does not relieve the permittee of the responsibility of complying with any other laws, regulations, or judicial orders issued pursuant to Section 316(b) of the Clean Water Act.

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Attachment H

Standard Condition

Definitions

Act means the Illinois Environmental Protection Act, 415 ILCS 5 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 measurements, 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 requirements.

(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 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 and 40 CFR 122.63. 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 or USEPA (including an authorized contractor acting as a representative of the Agency or USEPA), 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. Records related to the permittee's sewage sludge use and disposal activities shall be retained for a period of at least five years (or longer as required by 40 CFR Part 503). This period may be extended by request of the Agency or USEPA 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.

(c) **Changes of Authorization.** If an authorization under (b) is no longer 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.

(d) **Certification.** Any person signing a document under paragraph (a) or (b) of this section shall make the following certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

(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.

Notice is required when:

(1) The alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source pursuant to 40 CFR 122.29 (b); or

(2) The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification applies to pollutants which are subject neither to effluent limitations in the permit, nor to notification requirements pursuant to 40 CFR 122.42 (a)(1).

(3) The alteration or addition results in a significant change in the permittee's sludge use or disposal practices, and such alteration, addition, or change may justify the application of permit conditions that are different from or absent in the existing permit, including notification of additional use or disposal sites not reported during the permit application process or not reported pursuant to an approved land application plan.

(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) **Transfers.** This permit is not transferable to any person except after notice to the Agency.

(d) **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.

(e) **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.

(f) **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 time; 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 reoccurrence 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

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limitation in the permit.

(2) Any upset which exceeds any effluent limitation in the permit.

(3) Violation of a maximum daily discharge limitation for any of the pollutants listed by the Agency in the permit or any pollutant which may endanger health or the environment. The Agency may waive the written report on a case-by-case basis if the oral report has been received within 24-hours.

(g) **Other noncompliance**. The permittee shall report all instances of noncompliance not reported under paragraphs (12) (d), (e), or (f), at the time monitoring reports are submitted. The reports shall contain the information listed in paragraph (12) (f).

(h) **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) **Bypass**.

(a) Definitions.

(1) Bypass means the intentional diversion of waste streams from any portion of a treatment facility.

(2) Severe property damage means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

(b) Bypass not exceeding limitations. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of paragraphs (13)(c) and (13)(d).

(c) Notice.

(1) Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least ten days before the date of the bypass.

(2) Unanticipated bypass. The permittee shall submit notice of an unanticipated bypass as required in paragraph (12)(f) (24-hour notice).

(d) Prohibition of bypass.

(1) Bypass is prohibited, and the Agency may take enforcement action against a permittee for bypass, unless:

(i) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

(ii) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and

(iii) The permittee submitted notices as required under paragraph (13)(c).

(2) The Agency may approve an anticipated bypass, after considering its adverse effects, if the Agency determines that it will meet the three conditions listed above in paragraph (13)(d)(1).

(14) **Upset**.

(a) Definition. Upset means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

(b) Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with such technology based permit effluent limitations if the requirements of paragraph (14)(c) are met. No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review.

(c) Conditions necessary for a demonstration of upset. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An upset occurred and that the permittee can identify the cause(s) of the upset;

(2) The permitted facility was at the time being properly operated; and

(3) The permittee submitted notice of the upset as required in paragraph (12)(f)(2) (24-hour notice).

(4) The permittee complied with any remedial measures required under paragraph (4).

(d) Burden of proof. In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof.

(15) **Transfer of permits**. Permits may be transferred by modification or automatic transfer as described below:

(a) Transfers by modification. Except as provided in paragraph (b), a permit may be transferred by the permittee to a new owner or operator only if the permit has been modified or revoked and reissued pursuant to 40 CFR 122.62 (b) (2), or a minor modification made pursuant to 40 CFR 122.63 (d), to identify the new permittee and incorporate such other requirements as may be necessary under the Clean Water Act.

(b) Automatic transfers. As an alternative to transfers under paragraph (a), any NPDES permit may be automatically transferred to a new permittee if:

(1) The current permittee notifies the Agency at least 30 days in advance of the proposed transfer date;

(2) The notice includes a written agreement between the existing and new permittees containing a specified date for transfer of permit responsibility, coverage and liability between the existing and new permittees; and

(3) 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.

(16) 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);

(2) Two hundred micrograms per liter (200 ug/l) for acrolein and 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.

(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.

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(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.

(17) 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 discharge 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.

(18) 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:
(a) User charges pursuant to Section 204 (b) of the Clean Water Act, and applicable regulations appearing in 40 CFR 35;
(b) Toxic pollutant effluent standards and pretreatment standards pursuant to Section 307 of the Clean Water Act; and
(c) Inspection, monitoring and entry pursuant to Section 308 of the Clean Water Act.

(19) 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 reissued to conform to that effluent standard or limitation.

(20) 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.

(21) 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.

(22) The Clean Water Act provides that any person who violates a permit condition implementing Sections 301, 302, 306, 307, 308, 318, or 405 of the Clean Water Act is subject to a civil penalty not to exceed $25,000 per day of such violation. Any person who willfully or negligently violates permit conditions implementing Sections 301, 302, 306, 307, 308, 318 or 405 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. Additional penalties for violating these sections of the Clean Water Act are identified in 40 CFR 122.41 (a)(2) and (3).

(23) 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 this permit shall, upon conviction, be punished by a fine of not more than $10,000, or by imprisonment for not more than 2 years, or both. If a conviction of a person is for a violation committed after a first conviction of such person under this paragraph, punishment is a fine of not more than $20,000 per day of violation, or by imprisonment of not more than 4 years, or both.

(24) 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, 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.

(25) Collected screening, slurries, 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.

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

(27) 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 or any court with jurisdiction.

(28) 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.

(Rev. 7-9-2010 bah)

Electronic Filing: Received, Clerk's Office 10/27/2026

United States Environmental Protection Agency | Office of Enforcement and Compliance Assurance | September 2015

Final NPDES Electronic Reporting Rule

On 24 September 2015, Administrator Gina McCarthy signed the final National Pollutant Discharge Elimination System (NPDES) Electronic Reporting Rule for publication in the Federal Register. The publication of this rule is the latest step in an extensive multi year outreach effort with EPA's state, tribal and territorial partners. This rule will replace most paper-based Clean Water Act (CWA) NPDES permitting and compliance monitoring reporting requirements with electronic reporting.

Purpose of the Final Rule

This final rule is designed to save authorized state, tribe, or territorial NPDES programs considerable resources, make reporting easier for NPDES regulated entities, streamline permit renewals, ensure full exchange of basic NPDES permit data between states and EPA, improve environmental decision-making, and better protect human health and the environment.

This final rule requires that NPDES regulated entities electronically submit the following permit and compliance monitoring information instead of using paper reports:

- Discharge Monitoring Reports (DMRs);
- Notices of Intent to discharge in compliance with a general permit; and
- Program reports.

Authorized NPDES programs will also electronically submit NPDES program data to EPA to ensure that there is consistent and complete reporting nationwide, and to expedite the collection and processing of the data, thereby making it more accurate and timely. Importantly, while the rule changes the method by which information is provided (i.e., electronic rather than paper-based), it does not increase the amount of information required from NPDES regulated entities facilities under existing regulations.

Overview of Benefits

EPA anticipates that the final rule will save significant resources for states, tribes, and territories as well as EPA and NPDES permittees, while resulting in a more complete, accurate, and nationally-consistent set of data about the NPDES program. With full implementation (5 years after the effective date), the anticipated savings are:

- Authorized State NPDES programs: $22.6 million annually,
- NPDES regulated entities: $0.5 million annually, and
- EPA: $1.2 million annually.

the authorized NPDES biosolids program); and all other remaining NPDES program reports. These program reports include:

- Sewage Sludge/Biosolids Annual Program Reports [40 CFR 503] (for the 8 states that implement the Federal Biosolids Program)
- Concentrated Animal Feeding Operation (CAFO) Annual Program Reports [40 CFR 122.42(e)(4)]
- Municipal Separate Storm Sewer System (MS4) Program Reports [40 CFR 122.34(g)(3) and 122.42(c)]
- Pretreatment Program Reports [40 CFR 403.12(i)]
- Significant Industrial User Compliance Reports in Municipalities Without Approved Pretreatment Programs [40 CFR 403.12(e) and (h)]
- Sewer Overflow/Bypass Event Reports [40 CFR 122.41(l)(4), (l)(6) and (7), (m)(3)]
- CWA Section 316(b) Annual Reports [40 CFR 125 Subpart J]

How the final rule addresses comments

In response to concerns about implementation raised during the comment periods, the final rule provides authorized NPDES programs more flexibility to implement the final rule by providing them up to three additional years to electronically collect, manage, and share their data. Authorized NDPES Programs will also have more flexibility in how they can grant electronic reporting waivers.

Further Information

For additional information, please contact Messrs. John Dombrowski, Director, Enforcement Targeting and Data Division (202-566-0742) or Carey A. Johnston (202-566-1014), Office of Compliance (mail code 2222A), Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC, 20460; e-mail addresses: dombrowkski.john@epa.gov or johnston.carey@epa.gov.

Useful Final Rule Link:

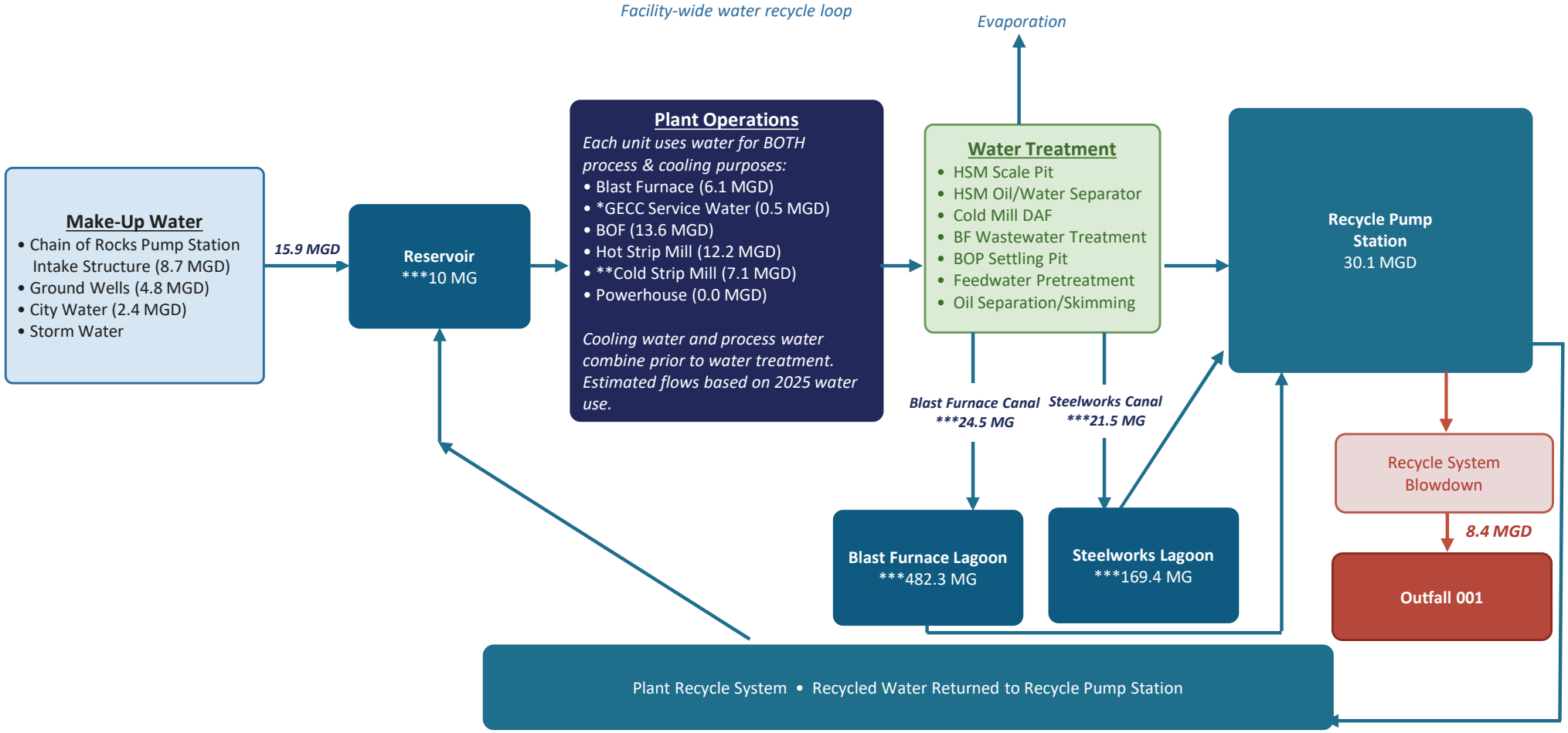
Email sign up for outreach events
https://public.govdelivery.com/accounts/USAEPAOECA/subscriber/new?

EXHIBIT F


Gabaret Island
Wilson Park
Chain of Rocks Intake
LINCOLN PLACE
Granite City
Gateway Regl Medical Ctr
Reservoir
Icon Mechanical Headquarters
Cold Mill
Galvanize Line
Hot Strip Mill
Pickle Line
Wrenway tires
BOF
Powerhouse
Blast Furnaces
Blast Furnace Lagoon
Recycle Pumphouse
WWTP
Outfall 001
Steelworks Lagoon
The Bee Hive
Marko's Fish
Madison Ave
E 23rd St
Nameoki Rd
Edwardsville Rd
162
203

EXHIBIT G

U. S. Steel Granite City Works – Simplified Recycle System Flow Diagram



MGD = Million Gallons per Day. Water is continuously recirculated; only a fraction is blown down and discharged at Outfall 001 to maintain water quality.
**Gateway Energy Coke Company (GECC) is a separate company that receives service water from U. S. Steel.*
*** Includes pickle line service water.*
**** Estimated design maximum capacity*

EXHIBIT H

Electronic Filing: Received, Clerk's Office 10/27/2026

Comment ID 316bNFR.029.011

Subject Matter Code	7.2
Definition: Cooling Water Intake Structure	

Author Name Jere W. Glover & Jonathan R. Pawlow

Organization Office of the Chief Counsel for Advocacy, U.S. Small Business Admin.

EPA Needs to Clarify How the Percentage Use Threshold Would Be Applied at Facilities Which Use Withdrawn Water for Both Process and Cooling Purposes.

Many facilities use withdrawn water in varying proportions over time for process versus cooling purposes. Furthermore, industrial facilities often preheat process water with energy captured from operations inside the facility. A common way of doing this is to run the water first through a use where heat will be transferred to the water (such as in a steam condenser) and then use it for other for process purposes. Moreover, some facilities use process water to perform subsequent cooling functions. Such practices conserve both water and energy. If such uses of water would constitute a "cooling water" function for purposes of applicability of the 316(b) standards, then in some cases facilities would be compelled to cease these practices, with substantial adverse environmental and energy consequences.

For example, industrial facilities would need to separate their cooling water from their process water to meet the standards for cooling water intake structures, with the result that they would lose the benefit of recovering waste heat for process purposes. Moreover, the lost heat that was going into the process of water use would result in the increased burning of fossil fuels to make up for the additional heat required. This burning of additional fossil fuels would result in other adverse environmental impacts such as higher air pollutant emissions and creation of greenhouse gases. These unintended consequences to the environment are negative and should be considered in the evaluation of adverse environmental impacts under this rule.

EPA Response

In the final rule EPA has amended the definition of cooling water intake structure to ensure that the rule does not discourage the reuse of cooling water as process water. The definition of "cooling water intake structure" specifies that, if heated water is used in a manufacturing process, it is considered process water for purposes of calculating the percentage of intake flow that is used for cooling purposes in 125.81(c) . Thus, water that serves as cooling water but is subsequently reused as process water is not considered cooling water for purposes of determining the percentage of the water withdrawn that is used for cooling and whether that percentage exceeds twenty-five (25) percent. EPA also has added language to the regulation that clarifies how the 25 percent threshold should be applied to new facilities that do not maintain a constant ratio of cooling water to process water. Section 125.81(b) provides that the threshold requirement that at least 25 percent of water withdrawn be used for cooling purposes is to be measured, on the basis of facility design, on an average monthly basis over a period of 1 year (any 12-month period). It further specifies that a new facility meets the 25 percent cooling water threshold if any monthly average, over a year, for the percentage of cooling water withdrawn is expected to equal or exceed 25 percent of the total water withdrawn.

EXHIBIT I

Electronic Filing: Received, Clerk's Office 10/27/2026

NPDES Permit No. IL0000329
Notice No. MEL:14051401.mel

Public Notice Beginning Date: **August 14, 2014**

Public Notice Ending Date: **September 15, 2014**

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
1951 State Street
Granite City, Illinois 62040

Name and Address of Facility:

United States Steel Corporation
Granite City Works
20th and State Street
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 Mark E. Liska 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 25.0 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.

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	38^0 41' 31"	North	90^0 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 RJC receiving the discharge from outfall(s) 001 is on the draft 2012 303(d) list of impaired waters and is not a biologically significant stream on the 2008 Illinois Department of Natural Resources Publication – *Integrating Multiple Taxa in a Biological Stream Rating System*.

The following parameters have been identified as the pollutants causing impairment:

Designated Use	Potential Cause
Fish Consumption	PCBs
Aesthetic Quality	Aquatic Algae, Phosphorus, Total Suspended Solids

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

Outfall: 001 Treated Process Wastewater

	LOAD LIMITS lbs/day DAF (DMF)			CONCENTRATION LIMITS mg/l		
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	REGULATION	30 DAY AVERAGE	DAILY MAXIMUM	REGULATION
Flow (MGD)				Measure		35 IAC 309.146
pH				6.0 - 9.0		35 IAC 304.125
$CBOD_5$	2085	4170	35 IAC 304.120(c)	10	20	35 IAC 304.120(c)
Total Suspended Solids	2502	5004	35 IAC 304.120(c)	12	24	35 IAC 304.120(c)
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)	5.3	16	40 CFR 420	0.09	0.4	35 IAC 302.208
Zinc (total)	12	33	40 CFR 420	1	2	35 IAC 304.124
Cyanide (total)	19	35	35 IAC 304.124	0.01	0.02	35 IAC 302.208
Cyanide (available by 0IA 1677)	1.1	4.6	35 IAC 302.208	0.0052	0.022	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	438	2206	35 IAC 355	2.1	10.1	35 IAC 355
Summer	438	3128	35 IAC 355	2.1	15	35 IAC 355
Winter	874	1616	35 IAC 355	4.0	7.4	35 IAC 355
March	605	1616	35 IAC 355	2.9	7.4	35 IAC 355
Phosphorus					Monitor Only	35 IAC 309.146

*Spring/Fall is April-May and September-October. Summer is June-August. Winter is November-February. Weekly average limits

apply for Spring/Fall and Summer. Weekly average limits are as follows: Spring/Fall: 5.2 mg/L; Summer: 5.4 mg/L. No weekly average limit applies in Winter or March.

	LOAD LIMITS lbs/day DAF (DMF)			CONCENTRATION LIMITS mg/l		
PARAMETER	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		0.69	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 25.0 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, $CBOD_5$, Total Suspended Solids, Iron (total), Iron (dissolved), Cyanide (Total), 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:

Subcategory		Production Rate
Subpart A - Coke Making Subcategory		1454 tons/day
Subpart C - Iron Making Subcategory		7793 tons/day
Subpart D - Steel Making Subcategory		7793 tons/day
Subpart F - Continuous Casting Subcategory		8579 tons/day
Subpart G - Hot Forming Subcategory		11,362 tons/day
Subpart I - Acid Pickling Subcategory		3084 tons/day
Subpart J - Cold Forming Subcategory		2065 tons/day
Subpart K - Alkaline Cleaning Subcategory		1656 tons/day
Subpart L - Hot Coating Subcategory		1656 tons/day

For outfall 001: Oil & Grease, Lead, Zinc, 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 2065 tons/day x (2000 lb/ton) = 0.69 lb/day = Naphthalene Daily Maximum Load Limit at outfall B01.

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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.

Extensive DMR data show that there is no potential to exceed the water quality standard for zinc at end-of-pipe. Because of this, the 30-day average concentration limit and the daily maximum concentration limit for zinc are now based on limits pursuant to 35 Ill. Adm. Code 304.124 instead of 35 Ill. Adm. Code 302.208. Zinc will continue to also have load limits based on regulations pursuant to 40 CFR 420 and will continue to be sampled twice per week.

Although the concentration limits for zinc have increased, not only have the load limits decreased, the changes do not result in an actual increase of zinc loading due to the improved monitoring data. The discharge is not subject to an anti-degradation assessment pursuant to 35 Ill. Adm. Code 302.102(d)(7).

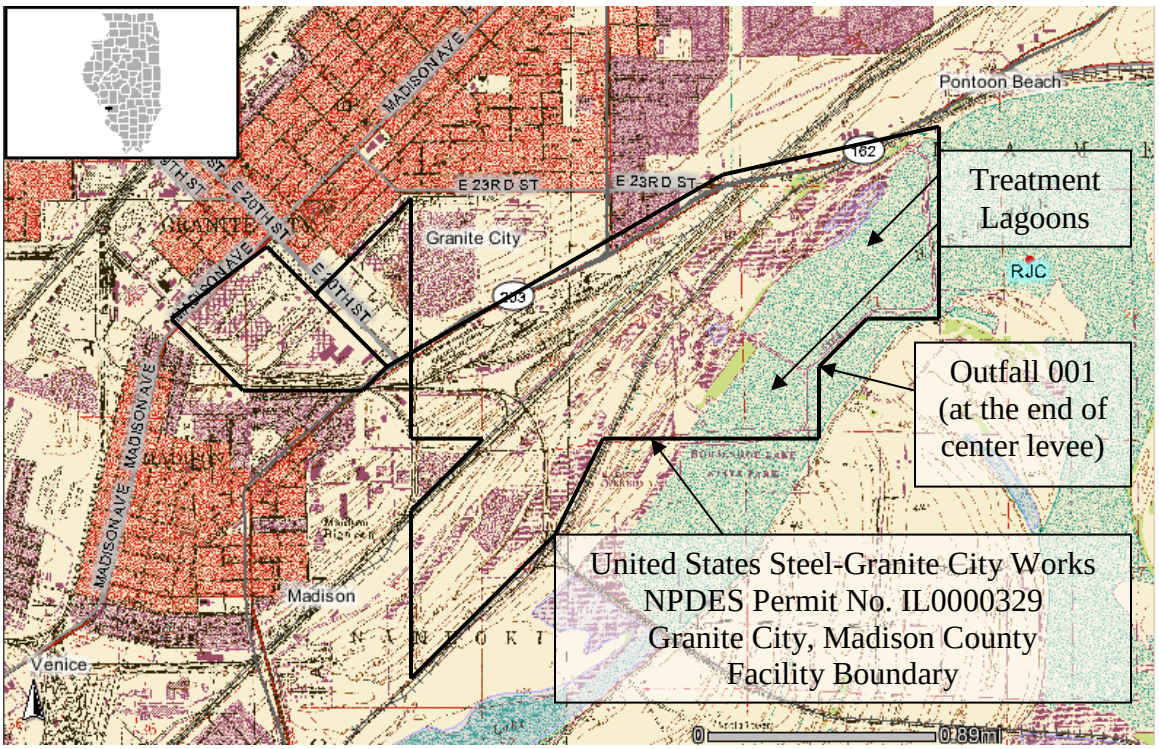
The process wastewater is used primarily for cleaning the metal and is not used for cooling purposes. The discharge is not subject to 316(b) regulations.

The intake consists of 4 pumps which can pump 13,900 GPM each and pump through a 54-inch diameter pipe. When pumping at the DAF of 25.0 MGD, they give a flow velocity of approximately 2.4 feet/second.

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

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. 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. The permittee shall take additional metals monitoring at outfall 001.


Pontoon Beach
MADISON AVE
E 23RD ST
E 23RD ST
162
Granite City
203
RJC
Treatment Lagoons
Outfall 001 (at the end of center levee)
MADISON AVE
Madison
Venice
United States Steel-Granite City Works
NPDES Permit No. IL0000329
Granite City, Madison County
Facility Boundary
0
0.89mi

Electronic Filing: Received, Clerk's Office 10/27/2026

Public Notice of Draft Permit

Public Notice Number MEL:14051401.mel 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, 1951 State Street, 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 two 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 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:MEL:14051401.mel

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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:

Issue Date:
Effective Date:

Name and Address of Permittee:

United States Steel Corporation
Granite City Works
1951 State Street
Granite City, Illinois 62040

Facility Name and Address:

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

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:MEL:14051401.mel

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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 – (DAF = 25.0 MGD)
Treated Process Wastewater consists of wastewater from the blast furnace, basic oxygen furnace, 80" hot strip mill, landfill leachates, galvanizing lines, sanitary, stormwater runoff, continuous casters, boiler blowdown, maintenance shops, laboratories, coke plant, cold mill, continuous pickler, and miscellaneous flows

	LOAD LIMITS lbs/day DAF (DMF)		CONCENTRATION LIMITS mg/l			
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM	SAMPLE FREQUENCY	SAMPLE TYPE
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)	5.3	16	0.09	0.4	1/Quarter	Composite
Zinc (total)	12	33	1	2	2/Week	Composite
Cyanide (total)	19	35	0.1	0.2	2/Week	Composite
Cyanide (available by 0IA 1677)	1.1	4.6	0.0052	0.022	2/Month	Composite
Phenol (4AAP)	5.0	10		0.1	2/Week	Composite
Fluoride		834		4	2/Week	Composite
Ammonia-Nitrogen*						
Spring/Fall	438	2206	2.1	10.1	2/Week	Composite
Summer	438	3128	2.1	15.0	2/Week	Composite
Winter	874	1616	4.0	7.4	2/Week	Composite
March	605	1616	2.9	7.4	2/Week	Composite
Phosphorus				Monitor Only	1/Month	Grab

*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 5.2 mg/L (1084 lb/day). Summer weekly average limit is 5.4 mg/L (1126 lb/day). There is no weekly average limit for Winter or March.

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

	LOAD LIMITS lbs/day DAF (DMF)		CONCENTRATION LIMITS mg/l			
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM	SAMPLE FREQUENCY	SAMPLE TYPE
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		0.69			1/Month	Grab
Outfall: C01 - Landfill Leachate Wastewater						
Flow (MGD)	See Special Condition 1				Continuous	Measure

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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:

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

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 outfall each month.

In the event that an outfall does not discharge during a monthly reporting period, the DMR Form shall be submitted with no discharge indicated.

The Permittee may choose to submit electronic DMRs (NetDMRs) instead of mailing paper DMRs to the IEPA. More information, including registration information for the NetDMR program, can be obtained on the IEPA website, http://www.epa.state.il.us/water/net-dmr/index.html.

The completed Discharge Monitoring Report forms shall be submitted to IEPA no later than the 15th day of the following month, unless otherwise specified by the permitting authority.

Permittees not using NetDMRs shall mail Discharge Monitoring Reports with an original signature to the IEPA at the following address:

Illinois Environmental Protection Agency
Division of Water Pollution Control
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

Attention: Compliance Assurance Section, Mail Code # 19

Electronic Filing: Received, Clerk's Office 10/27/2026

Special Conditions

SPECIAL CONDITION 8. 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 9. The Agency has determined that the effluent limitations in this permit constitute BAT/BCT for storm water which is treated in the existing treatment facilities for purposes of this permit reissuance, and no pollution prevention plan will be required for such storm water. In addition to the chemical specific monitoring required elsewhere in this permit, the permittee shall conduct an annual inspection of the facility site to identify areas contributing to a storm water discharge associated with industrial activity, and determine whether any facility modifications have occurred which result in previously-treated storm water discharges no longer receiving treatment. If any such discharges are identified the permittee shall request a modification of this permit within 30 days after the inspection. Records of the annual inspection shall be retained by the permittee for the term of this permit and be made available to the Agency on request.

SPECIAL CONDITION 10. The Permittee shall monitor the effluent from Outfall 001 for the following parameters on a 2/year basis. This Permit may be modified with public notice to establish effluent limitations if appropriate, based on information obtained through sampling. The sample shall be a 24-hour effluent composite except as otherwise specifically provided below and the results shall be submitted on the DMR's to IEPA. The parameters to be sampled and the minimum reporting limits to be attained are as follows:

STORET CODE	PARAMETER	Minimum reporting limit
10197	Antimony	5.0 ug/L
01002	Arsenic	0.05 mg/L
01007	Barium	0.5 mg/L
01027	Cadmium	0.001 mg/L
01032	Chromium (Hexavalent) (grab)	0.01 mg/L
01034	Chromium (total)	0.05 mg/L
01042	Copper	0.005 mg/L
01055	Manganese	0.5 mg/L
71900	Mercury	0.2 ug/L
01067	Nickel	0.005 mg/L
01147	Selenium	0.005 mg/L
01077	Silver (total)	0.003 mg/L

Unless otherwise indicated, concentrations refer to the total amount of the constituent present in all phases, whether solid, suspended or dissolved, elemental or combined, including all oxidation states.

The analyses for the above parameters shall meet the detection limits as established for accepted test procedures listed in 40 CFR 136.

All samples for mercury must be analyzed by EPA Method 1631E using the digestion procedure described in Section 11.1.1.2 of 1631E, which dictates that samples must be heated at 50^{o}C for 6 hours in a bromine chloride (BrCl) solution in closed vessels.

EXHIBIT J

Electronic Filing: Received, Clerk's Office 10/27/2026

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829

BRUCE RAUNER, GOVERNOR LISA BONNETT, DIRECTOR

217/782-0610

May 22, 2015

United States Steel Corporation
1951 State Street
Granite City, Illinois 62040

Re: United States Steel Corporation – Granite City Works
NPDES Permit No. IL0000329
Final Permit

Gentlemen:

Attached is the final NPDES Permit for your discharge. The Permit as issued covers discharge limitations, monitoring, and reporting requirements. Failure to meet any portion of the Permit could result in civil and/or criminal penalties. The Illinois Environmental Protection Agency is ready and willing to assist you in interpreting any of the conditions of the Permit as they relate specifically to your discharge. The Agency received you letter dated September 24, 2014 and your e-mail dated May 7, 2015. The following changes have been made since the public notice of the permit:

1. Special Condition 11 has been added to the permit noting a re-opener clause in the case that a TMDL is finalized for Horseshoe Lake.

2. The 30-day average concentration limit for zinc at outfall 001 has been revised to 0.17 mg/L. The daily maximum concentration limit for zinc at outfall 001 has been revised to 0.96 mg/L.

3. Load limits for benzo(a)pyrene and naphthalene at outfall A01 have been revised to have a monthly average load limit of 0.03 lb/day and a daily maximum load limit of 0.05 lb/day.

The Agency has begun a program allowing the submittal of electronic Discharge Monitoring Reports (NetDMRs) instead of paper Discharge Monitoring Reports (DMRs). If you are interested in NetDMRs, more information can be found on the Agency website, http://epa.state.il.us/water/edmr/index.html. If your facility is not registered in the NetDMR program, a supply of preprinted paper DMR Forms for your facility will be sent to you prior to the initiation of DMR reporting under the reissued permit. Additional information and instructions will accompany the preprinted DMRs upon their arrival.

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The attached Permit is effective as of the date indicated on the first page of the Permit. Until the effective date of any re-issued Permit, the limitations and conditions of the previously-issued Permit remain in full effect. You have the right to appeal any condition of the Permit to the Illinois Pollution Control Board within a 35 day period following the issuance date.

Should you have questions concerning the Permit, please contact Mark E. Liska at 217/782-0610.

Sincerely,

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

DEL:MEL:14051401.mel

Attachment: Final Permit

cc: Records
Compliance Assurance Section
Collinsville Region
Billing
USEPA
SWIMRPC

Electronic Filing: Received, Clerk's Office 10/27/2026

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: May 31, 2020

Issue Date: May 22, 2015
Effective Date: June 1, 2015

Name and Address of Permittee:

United States Steel Corporation
Granite City Works
1951 State Street
Granite City, Illinois 62040

Facility Name and Address:

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

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

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

SAK:MEL:14051401.mel

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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 – (DAF = 25.0 MGD)
Treated Process Wastewater consists of wastewater from the blast furnace, basic oxygen furnace, 80" hot strip mill, landfill leachates, galvanizing lines, sanitary, stormwater runoff, continuous casters, boiler blowdown, maintenance shops, laboratories, coke plant, cold mill, continuous pickler, and miscellaneous flows

	LOAD LIMITS lbs/day DAF (DMF)		CONCENTRATION LIMITS mg/l			
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM	SAMPLE FREQUENCY	SAMPLE TYPE
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)	5.3	16	0.09	0.4	1/Quarter	Composite
Zinc (total)	12	33	0.17	0.96	2/Week	Composite
Cyanide (total)	19	35	0.1	0.2	2/Week	Composite
Cyanide (available by OIA 1677)	1.1	4.6	0.0052	0.022	2/Month	Composite
Phenol (4AAP)	5.0	10		0.1	2/Week	Composite
Fluoride		834		4	2/Week	Composite
Ammonia-Nitrogen*						
Spring/Fall	438	2206	2.1	10.1	2/Week	Composite
Summer	438	3128	2.1	15.0	2/Week	Composite
Winter	874	1616	4.0	7.4	2/Week	Composite
March	605	1616	2.9	7.4	2/Week	Composite
Phosphorus				Monitor Only	1/Month	Grab

*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 5.2 mg/L (1084 lb/day). Summer weekly average limit is 5.4 mg/L (1126 lb/day). There is no weekly average limit for Winter or March.

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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): B01, C01

	LOAD LIMITS lbs/day DAF (DMF)		CONCENTRATION LIMITS mg/l			
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM	SAMPLE FREQUENCY	SAMPLE TYPE
Outfall: A01 – Coke By-Products Wastewater						
Flow (MGD)	See Special Condition 1				Continuous	Measure
Total Suspended Solids				Monitor	1/Month	Composite
Naphthalene	0.03	0.05			2/Week	Composite
Benzo(a)pyrene	0.03	0.05			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		0.69			1/Month	Grab
Outfall: C01 - Landfill Leachate Wastewater						
Flow (MGD)	See Special Condition 1				Continuous	Measure

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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:

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

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 outfall each month.

In the event that an outfall does not discharge during a monthly reporting period, the DMR Form shall be submitted with no discharge indicated.

The Permittee may choose to submit electronic DMRs (NetDMRs) instead of mailing paper DMRs to the IEPA. More information, including registration information for the NetDMR program, can be obtained on the IEPA website, http://www.epa.state.il.us/water/net-dmr/index.html.

The completed Discharge Monitoring Report forms shall be submitted to IEPA no later than the 15th day of the following month, unless otherwise specified by the permitting authority.

Permittees not using NetDMRs shall mail Discharge Monitoring Reports with an original signature to the IEPA at the following address:

Illinois Environmental Protection Agency
Division of Water Pollution Control
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

Attention: Compliance Assurance Section, Mail Code # 19

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NPDES Permit No. IL0000329

Special Conditions

SPECIAL CONDITION 8. 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 9. The Agency has determined that the effluent limitations in this permit constitute BAT/BCT for storm water which is treated in the existing treatment facilities for purposes of this permit reissuance, and no pollution prevention plan will be required for such storm water. In addition to the chemical specific monitoring required elsewhere in this permit, the permittee shall conduct an annual inspection of the facility site to identify areas contributing to a storm water discharge associated with industrial activity, and determine whether any facility modifications have occurred which result in previously-treated storm water discharges no longer receiving treatment. If any such discharges are identified the permittee shall request a modification of this permit within 30 days after the inspection. Records of the annual inspection shall be retained by the permittee for the term of this permit and be made available to the Agency on request.

SPECIAL CONDITION 10. The Permittee shall monitor the effluent from Outfall 001 for the following parameters on a 2/year basis. This Permit may be modified with public notice to establish effluent limitations if appropriate, based on information obtained through sampling. The sample shall be a 24-hour effluent composite except as otherwise specifically provided below and the results shall be submitted on the DMR's to IEPA. The parameters to be sampled and the minimum reporting limits to be attained are as follows:

STORET CODE	PARAMETER	Minimum reporting limit
10197	Antimony	5.0 ug/L
01002	Arsenic	0.05 mg/L
01007	Barium	0.5 mg/L
01027	Cadmium	0.001 mg/L
01032	Chromium (Hexavalent) (grab)	0.01 mg/L
01034	Chromium (total)	0.05 mg/L
01042	Copper	0.005 mg/L
01055	Manganese	0.5 mg/L
71900	Mercury	0.2 ug/L
01067	Nickel	0.005 mg/L
01147	Selenium	0.005 mg/L
01077	Silver (total)	0.003 mg/L

Unless otherwise indicated, concentrations refer to the total amount of the constituent present in all phases, whether solid, suspended or dissolved, elemental or combined, including all oxidation states.

The analyses for the above parameters shall meet the detection limits as established for accepted test procedures listed in 40 CFR 136.

All samples for mercury must be analyzed by EPA Method 1631E using the digestion procedure described in Section 11.1.1.2 of 1631E, which dictates that samples must be heated at 50°C for 6 hours in a bromine chloride (BrCl) solution in closed vessels.

SPECIAL CONDITION 11: This Permit may be modified to include alternative or additional final effluent limitations pursuant to an approved Total Maximum Daily Load (TMDL) Study or upon approval of an alternate Water Quality Study.

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Attachment H

Standard Conditions

Definitions

Act means the Illinois Environmental Protection Act, 415 ILCS 5 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 measurements, 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 requirements.

(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 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 and 40 CFR 122.63. 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.

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(9) **Inspection and entry.** The permittee shall allow an authorized representative of the Agency or USEPA (including an authorized contractor acting as a representative of the Agency or USEPA), 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. Records related to the permittee's sewage sludge use and disposal activities shall be retained for a period of at least five years (or longer as required by 40 CFR Part 503). This period may be extended by request of the Agency or USEPA 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.

(c) **Changes of Authorization**. If an authorization under (b) is no longer 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.

(d) **Certification**. Any person signing a document under paragraph (a) or (b) of this section shall make the following certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

(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.
Notice is required when:

(1) The alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source pursuant to 40 CFR 122.29 (b); or

(2) The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification applies to pollutants which are subject neither to effluent limitations in the permit, nor to notification requirements pursuant to 40 CFR 122.42 (a)(1).

(3) The alteration or addition results in a significant change in the permittee's sludge use or disposal practices, and such alteration, addition, or change may justify the application of permit conditions that are different from or absent in the existing permit, including notification of additional use or disposal sites not reported during the permit application process or not reported pursuant to an approved land application plan.

(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) **Transfers**. This permit is not transferable to any person except after notice to the Agency.

(d) **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.

(e) **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).

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(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.

(f) **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 time; 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 reoccurrence 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) Any upset which exceeds any effluent limitation in the permit.

(3) Violation of a maximum daily discharge limitation for any of the pollutants listed by the Agency in the permit or any pollutant which may endanger health or the environment.

The Agency may waive the written report on a case-by-case basis if the oral report has been received within 24-hours.

(g) **Other noncompliance.** The permittee shall report all instances of noncompliance not reported under paragraphs (12) (d), (e), or (f), at the time monitoring reports are submitted. The reports shall contain the information listed in paragraph (12) (f).

(h) **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) **Bypass.**

(a) Definitions.

(1) Bypass means the intentional diversion of waste streams from any portion of a treatment facility.

(2) Severe property damage means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

(b) Bypass not exceeding limitations. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of paragraphs (13)(c) and (13)(d).

(c) Notice.

(1) Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least ten days before the date of the bypass.

(2) Unanticipated bypass. The permittee shall submit notice of an unanticipated bypass as required in paragraph (12)(f) (24-hour notice).

(d) Prohibition of bypass.

(1) Bypass is prohibited, and the Agency may take enforcement action against a permittee for bypass, unless:

(i) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

(ii) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and

(iii) The permittee submitted notices as required under paragraph (13)(c).

(2) The Agency may approve an anticipated bypass, after considering its adverse effects, if the Agency determines that it will meet the three conditions listed above in paragraph (13)(d)(1).

(14) **Upset.**

(a) Definition. Upset means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

(b) Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with such technology based permit effluent limitations if the requirements of paragraph (14)(c) are met. No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review.

(c) Conditions necessary for a demonstration of upset. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An upset occurred and that the permittee can identify the cause(s) of the upset;

(2) The permitted facility was at the time being properly operated; and

(3) The permittee submitted notice of the upset as required in paragraph (12)(f)(2) (24-hour notice).

(4) The permittee complied with any remedial measures required under paragraph (4).

(d) Burden of proof. In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof.

(15) **Transfer of permits.** Permits may be transferred by modification or automatic transfer as described below:

(a) Transfers by modification. Except as provided in paragraph (b), a permit may be transferred by the permittee to a new owner or operator only if the permit has been modified or revoked and reissued pursuant to 40 CFR 122.62 (b) (2), or a minor modification made pursuant to 40 CFR 122.63 (d), to identify the new permittee and incorporate such other requirements as may be necessary under the Clean Water Act.

(b) Automatic transfers. As an alternative to transfers under paragraph (a), any NPDES permit may be automatically

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transferred to a new permittee if:
(1) The current permittee notifies the Agency at least 30 days in advance of the proposed transfer date;
(2) The notice includes a written agreement between the existing and new permittees containing a specified date for transfer of permit responsibility, coverage and liability between the existing and new permittees; and
(3) 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.

(16) 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);
(2) Two hundred micrograms per liter (200 ug/l) for acrolein and 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.
(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.

(17) 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 discharge 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.

(18) 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:
(a) User charges pursuant to Section 204 (b) of the Clean Water Act, and applicable regulations appearing in 40 CFR 35;
(b) Toxic pollutant effluent standards and pretreatment standards pursuant to Section 307 of the Clean Water Act; and
(c) Inspection, monitoring and entry pursuant to Section 308 of the Clean Water Act.

(19) 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 reissued to conform to that effluent standard or limitation.

(20) 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.

(21) 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.

(22) The Clean Water Act provides that any person who violates a permit condition implementing Sections 301, 302, 306, 307, 308, 318, or 405 of the Clean Water Act is subject to a civil penalty not to exceed $25,000 per day of such violation. Any person who willfully or negligently violates permit conditions implementing Sections 301, 302, 306, 307, 308, 318 or 405 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.
Additional penalties for violating these sections of the Clean Water Act are identified in 40 CFR 122.41 (a)(2) and (3).

(23) 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 this permit shall, upon conviction, be punished by a fine of not more than $10,000, or by imprisonment for not more than 2 years, or both. If a conviction of a person is for a violation committed after a first conviction of such person under this paragraph, punishment is a fine of not more than $20,000 per day of violation, or by imprisonment of not more than 4 years, or both.

(24) 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, 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.

(25) Collected screening, slurries, 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.

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

(27) 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 or any court with jurisdiction.

(28) 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.

EXHIBIT K

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NPDES Permit No. IL0000329
Notice No. MEL:20081201.docx

Public Notice Beginning Date: **November 20, 2020**

Public Notice Ending Date: **December 21, 2020**

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
1951 State Street
Granite City, Illinois 62040

Name and Address of Facility:

United States Steel Corporation
Granite City Works
20th and State Street
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 Mark E. Liska 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 25.0 MGD of treated process wastewater from outfall 001, 0.604 MGD of cold rolling mill wastewater from outfall B01, and 0.20 MGD of landfill leachate wastewater from outfall C01.

Modification: Outfall A01 has been removed from the permit because Coke Making Operations have permanently ceased at the facility.

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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	38^0 41' 31"	North	90^0 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 RJC receiving the discharge from outfall(s) 001 is on the draft 2016 303(d) list of impaired waters and is not a biologically significant stream on the 2008 Illinois Department of Natural Resources Publication – *Integrating Multiple Taxa in a Biological Stream Rating System*.

The following parameters have been identified as the pollutants causing impairment:

Designated Use	Potential Cause
Fish Consumption	Mercury, PCBs
Aesthetic Quality	Aquatic Algae, Phosphorus, Total Suspended Solids

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

Outfall: 001 Treated Process Wastewater IAC = Illinois Administrative Code

	LOAD LIMITS lbs/day DAF (DMF)			CONCENTRATION LIMITS mg/l		
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	REGULATION	30 DAY AVERAGE	DAILY MAXIMUM	REGULATION
Flow (MGD)				Measure		35 IAC 309.146
pH				6.0 - 9.0		35 IAC 304.125
$CBOD_5$	2085	4170	35 IAC 304.120(c)	10	20	35 IAC 304.120(c)
Total Suspended Solids	2502	5004	35 IAC 304.120(c)	12	24	35 IAC 304.120(c)
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)	5.3	16	40 CFR 420	.09	0.4	35 IAC 302.208
Zinc (total)	12	33	40 CFR 420.01(b)	0.17	0.96	40 CFR 120.44(l) 35 IAC 302.208
Cyanide (total)	19	35	35 IAC 304.124	0.1	0.2	35 IAC 302.208
Cyanide (available by 0IA 1677)	1.1	4.6	35 IAC 302.208	0.0052	0.022	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	521	2585	35 IAC 355	2.5	12.4	35 IAC 355
Summer	479	3128	35 IAC 355	2.3	15	35 IAC 355
Winter	834	1188	35 IAC 355	4.0	5.7	35 IAC 355
March	688	1188	35 IAC 355	3.3	5.7	35 IAC 355
Phosphorus					Monitor Only	35 IAC 309.146

*Spring/Fall is April-May and September-October. Summer is June-August. Winter is November-February. Weekly average limits apply for Spring/Fall and Summer. Weekly average limits are as follows: Spring/Fall: 6.2 mg/L; Summer: 5.7 mg/L. No weekly average limit applies in Winter or March.

	LOAD LIMITS lbs/day DAF (DMF)			CONCENTRATION LIMITS mg/l		
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	REGULATION	30 DAY AVERAGE	DAILY MAXIMUM	REGULATION
Outfall: B01 - Cold Rolling Mill Wastewater						
Flow (MGD)				Measure		
Tetrachloroethylene		1.1	40 CFR 420			
Naphthalene		0.69	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 25.0 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, $CBOD_5$, Total Suspended Solids, Iron (total), Iron (dissolved), Cyanide (Total), 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 are based on production from the previous permit application from 2015 at the request of the permittee because production for the most recent 5 years is not representative of future anticipated production trends. Production figures utilized in these calculations for the following subcategories are as follows:

Subcategory	Production Rate
Subpart A - Coke Making Subcategory	1454 tons/day
Subpart C - Iron Making Subcategory	7793 tons/day
Subpart D - Steel Making Subcategory	7793 tons/day
Subpart F - Continuous Casting Subcategory	8579 tons/day
Subpart G - Hot Forming Subcategory	11,362 tons/day
Subpart I - Acid Pickling Subcategory	3084 tons/day
Subpart J - Cold Forming Subcategory	2065 tons/day
Subpart K - Alkaline Cleaning Subcategory	1656 tons/day
Subpart L - Hot Coating Subcategory	1656 tons/day

For outfall 001: Oil & Grease, Lead, Zinc, 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 2065 tons/day x (2000 lb/ton) = 0.69 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 process wastewater is used primarily for cleaning the metal and is not used for cooling purposes. The intake uses less than 25% for cooling purposes and is not subject to 316(b) regulations.

The intake consists of 4 pumps which can pump 13,900 GPM each and pump through a 54-inch diameter pipe. When pumping at the DAF of 25.0 MGD, they give a flow velocity of approximately 2.4 feet/second.

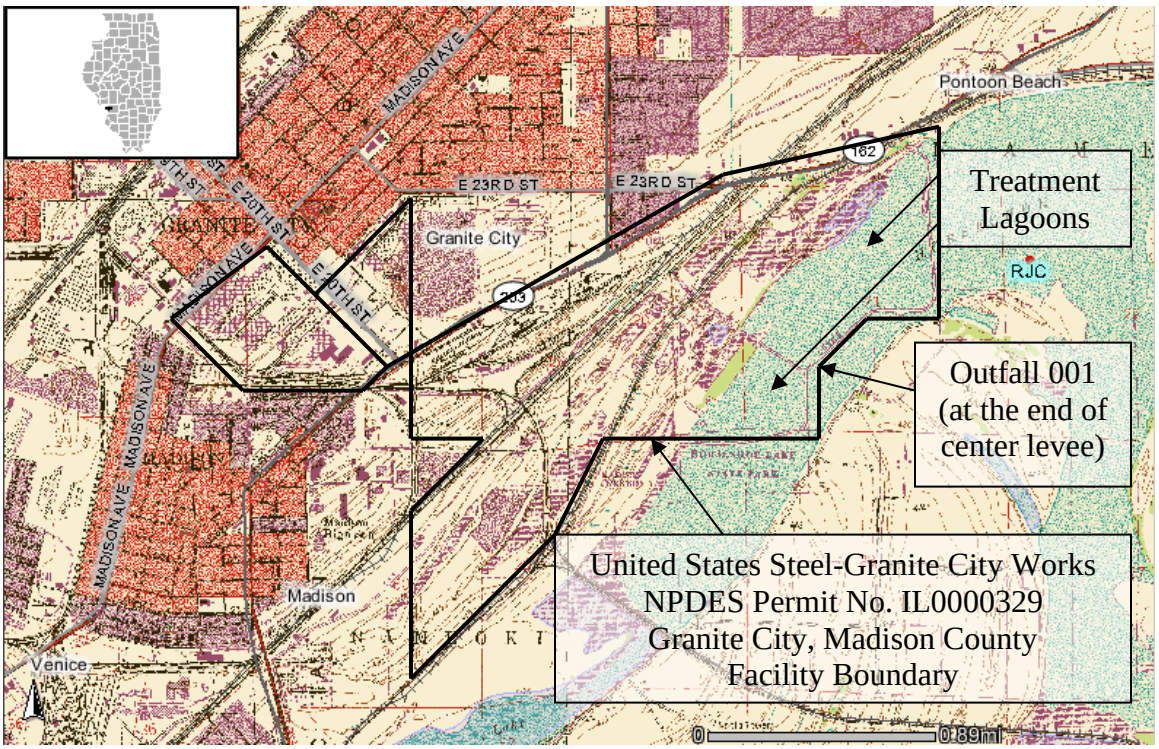
The load limits appearing in the permit will be the more stringent of the State and Federal Guidelines.

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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. 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. The permittee shall take additional metals monitoring at outfall 001.

A Total Maximum Daily Load (TMDL) Study has not been completed for Horseshoe Lake for any parameter.


Pontoon Beach
E 23RD ST
E 23RD ST
Granite City
GRANITE CITY
MADISON AVE
MADISON AVE
MADISON AVE
MADISON
Madison
Venice
162
203
RJC
Treatment Lagoons
Outfall 001 (at the end of center levee)
United States Steel-Granite City Works
NPDES Permit No. IL0000329
Granite City, Madison County
Facility Boundary
0
0.89mi

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Public Notice of Draft Permit

Public Notice Number MEL:20081201.docx 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, 1951 State Street, Granite City, Illinois 62040, (Madison County). Facility is an integrated steel mill, located in Granite City, in Madison County, in Southeastern Illinois. 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 two 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 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.

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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:

Issue Date:
Effective Date:

Name and Address of Permittee:

United States Steel Corporation
Granite City Works
1951 State Street
Granite City, Illinois 62040

Facility Name and Address:

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

Discharge Number and Name:		Receiving Waters:
001	Treated Process Wastewater	Horseshoe Lake
B01	Cold Rolling Mill Wastewater	Internal Outfall
C01	Landfill Leachate Wastewater	Internal Outfall

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.

Amy L. Dragovich, P.E.
Manager, Permit Section
Division of Water Pollution Control

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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 – (DAF = 25.0 MGD)
Treated Process Wastewater consists of wastewater from the blast furnace, basic oxygen furnace, 80" hot strip mill, landfill leachates, galvanizing lines, sanitary, stormwater runoff, continuous casters, boiler blowdown, maintenance shops, laboratories, cold mill, continuous pickler, and miscellaneous flows

	LOAD LIMITS lbs/day DAF (DMF)		CONCENTRATION LIMITS mg/l			
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM	SAMPLE FREQUENCY	SAMPLE TYPE
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	1/Week	Composite
Total Suspended Solids	2502	5004	12	24	1/Week	Composite
Oil & Grease	1511	3492	15	30	1/Week	Grab
Iron (total)	417	834	2	4	1/Month	Composite
Iron (dissolved)		209		1	1/Month	Composite
Lead (total)	5.3	16	0.09	0.4	1/Quarter	Composite
Zinc (total)	12	33	0.17	0.96	2/Week	Composite
Cyanide (total)	19	35	0.1	0.2	2/Month	Composite
Cyanide (available by 0IA 1677)	1.1	4.6	0.0052	0.022	2/Month	Composite
Phenol (4AAP)	5.0	10		0.1	1/Week	Composite
Fluoride		834		4	1/Week	Composite
Ammonia-Nitrogen*						
Spring/Fall	521	2585	2.5	12.4	1/Week	Composite
Summer	479	3128	2.3	15.0	1/Week	Composite
Winter	834	1188	4.0	5.7	1/Week	Composite
March	688	1188	3.3	5.7	1/Week	Composite
Phosphorus				Monitor Only	1/Quarter	Grab

*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 6.2 mg/L (1292 lb/day). Summer weekly average limit is 5.7 mg/L (1188 lb/day). There is no weekly average limit for Winter or March.

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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): B01, C01

	LOAD LIMITS lbs/day DAF (DMF)		CONCENTRATION LIMITS mg/l			
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM	SAMPLE FREQUENCY	SAMPLE TYPE
Outfall: B01 - Cold Rolling Mill Wastewater						
Flow (MGD)	See Special Condition 1				When Monitoring	Measure
Tetrachloroethylene		1.1			2/Year	Grab
Naphthalene		0.69			1/Quarter	Grab
Outfall: C01 - Landfill Leachate Wastewater						
Flow (MGD)	See Special Condition 1				Continuous	Measure

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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:

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

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) electronic forms using one such form for each outfall each month.

In the event that an outfall does not discharge during a monthly reporting period, the DMR Form shall be submitted with no discharge indicated.

The Permittee is required to submit electronic DMRs (NetDMRs) instead of mailing paper DMRs to the IEPA unless a waiver has been granted by the Agency. More information, including registration information for the NetDMR program, can be obtained on the IEPA website, https://www2.illinois.gov/epa/topics/water-quality/surface-water/netdmr/Pages/quick-answer-guide.aspx.

The completed Discharge Monitoring Report forms shall be submitted to IEPA no later than the 25th day of the following month, unless otherwise specified by the permitting authority.

Permittees that have been granted a waiver shall mail Discharge Monitoring Reports with an original signature to the IEPA at the following address:

Illinois Environmental Protection Agency
Division of Water Pollution Control
Attention: Compliance Assurance Section, Mail Code # 19
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

Electronic Filing: Received, Clerk's Office 10/27/2026

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Special Conditions

SPECIAL CONDITION 8. 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 9. The Agency has determined that the effluent limitations in this permit constitute BAT/BCT for storm water which is treated in the existing treatment facilities for purposes of this permit reissuance, and no pollution prevention plan will be required for such storm water. In addition to the chemical specific monitoring required elsewhere in this permit, the permittee shall conduct an annual inspection of the facility site to identify areas contributing to a storm water discharge associated with industrial activity, and determine whether any facility modifications have occurred which result in previously-treated storm water discharges no longer receiving treatment. If any such discharges are identified the permittee shall request a modification of this permit within 30 days after the inspection. Records of the annual inspection shall be retained by the permittee for the term of this permit and be made available to the Agency on request.

SPECIAL CONDITION 10. The Permittee shall monitor the effluent from Outfall 001 for the following parameters on a 2/year basis. This Permit may be modified with public notice to establish effluent limitations if appropriate, based on information obtained through sampling. The sample shall be a 24-hour effluent composite except as otherwise specifically provided below and the results shall be submitted on the DMR's to IEPA. The parameters to be sampled and the minimum reporting limits to be attained are as follows:

STORET CODE	PARAMETER	Minimum reporting limit
10197	Antimony	5.0 ug/L
01002	Arsenic	0.05 mg/L
01007	Barium	0.5 mg/L
01027	Cadmium	0.001 mg/L
01032	Chromium (Hexavalent) (grab)	0.01 mg/L
01034	Chromium (total)	0.05 mg/L
01042	Copper	0.005 mg/L
01055	Manganese	0.5 mg/L
71900	Mercury	0.2 ug/L
01067	Nickel	0.005 mg/L
01147	Selenium	0.005 mg/L
01077	Silver (total)	0.003 mg/L

Unless otherwise indicated, concentrations refer to the total amount of the constituent present in all phases, whether solid, suspended or dissolved, elemental or combined, including all oxidation states.

The analyses for the above parameters shall meet the detection limits as established for accepted test procedures listed in 40 CFR 136.

All samples for mercury must be analyzed by EPA Method 1631E using the digestion procedure described in Section 11.1.1.2 of 1631E, which dictates that samples must be heated at 50°C for 6 hours in a bromine chloride (BrCl) solution in closed vessels.

SPECIAL CONDITION 11: This Permit may be modified to include alternative or additional final effluent limitations pursuant to an approved Total Maximum Daily Load (TMDL) Study or upon approval of an alternate Water Quality Study.