



Mike DeWine, Governor
John Husted, Lt. Governor
Laurie A. Stevenson, Director

Ohio EPA 7/30/2020
Entered Directors Journal

July 30, 2020

Mr. Brian Kolesar
ArcelorMittal Cleveland, LLC
3060 Eggers Avenue
Cleveland, Ohio 44105

RE: ArcelorMittal Cleveland, Inc
Director's Authorization
Approval
Industrial Solid Waste Landfills
Cuyahoga County
ISWL020091

TRANSMITTED ELECTRONICALLY

**Subject: ArcelorMittal Cleveland, LLC – Area C Landfill, Cuyahoga County
Ohio Administrative Code (OAC) Rule 3745-30-08(C)(6)(g) Approval**

Dear Mr. Kolesar:

On May 29, 2020, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Northeast District Office (NEDO) received a document titled *2020 GAMP Background Statistical Database Update* dated May 28, 2020, for ArcelorMittal Cleveland Area C Landfill (Facility) located in Cuyahoga County. This document was prepared by Burgess & Niple, Inc. (B&N) on behalf of the Facility and requested that statistically different data be allowed to be added to the existing background datasets at the Facility.

Pursuant to Ohio Administrative Code (OAC) Rule 3745-30-08(C)(6)(g), background data can be added only in blocks of data resulting from the analysis of four or more statistically independent samples after the data have been statistically compared to the current background data and no statistical differences are detected, unless another method is deemed acceptable to the director.

The attached table presents the statistically different data for acetone, antimony, arsenic, barium, bis(2-ethylhexyl)phthalate, calcium, chemical oxygen demand, chloride, cobalt, ethylbenzene, iron, magnesium, manganese, 2-methylphenol, nitrate/nitrite, pH, phenol, potassium, silver, specific conductivity, sulfate, sulfide, tin, toluene, total alkalinity, total dissolved solids, total 3&4-methylphenol, and zinc from wells MW-30D/30DR, MW-31D/31DR and MW-32D that ArcelorMittal Cleveland, LLC proposes adding to the existing background datasets for the Area C Landfill Assessment Monitoring Program. The Facility also identified 15 outliers that they provided justification for remaining in their respective datasets.

Ohio EPA has reviewed the May 28, 2020 document and concurs with the request that the statistically different data and identified outliers be added to the existing background

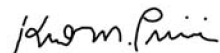
datasets. Ohio EPA's review determined that the Facility has provided sufficient evidence to demonstrate that the statistically different data can be added to the existing background datasets and meets the requirements of OAC 3745-30-08(C)(6)(g). Therefore, Ohio EPA approves ArcelorMittal's request pursuant to OAC 3745-30-08(C)(6)(g) at the Area C Landfill for the Ground Water Assessment Monitoring Program.

You are hereby notified that this action of the Director of Ohio EPA (Director) is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 made payable to "Treasurer, State of Ohio." The Commission, in its discretion, may reduce the fee if by affidavit it is demonstrated that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
30 East Broad Street, 4th Floor
Columbus, Ohio 43215

If you have any questions concerning this action, please contact Paul Parrish, Ohio EPA, NEDO, DMWM at (330) 963-1125.

Sincerely,



Kurt M. Princic
Chief, Northeast District Office
for Laurie A. Stevenson
Director, Ohio EPA

ec: Brian Kolesar, ArcelorMittal Cleveland, LLC
Dane Tussel, Cuyahoga County Board of Health
Annie Snyder, Cleveland Department of Public Health
Bill Lutz, Ohio EPA, NEDO, DMWM
Jarnal Singh, Ohio EPA, NEDO, DMWM

Project ID #9925

Proposed Data To Be Added			
Well	Parameter	Date	Result
MW-30DR	Acetone (µg/L)	8/3/2018	<20.0
		12/21/2018	<10.0
		6/12/2019	<10.0
		12/4/2019	<10.0
MW-32D	Acetone (µg/L)	6/13/2018	<20.0
		12/12/2018	<10.0
		6/12/2019	<10.0
		12/4/2019	<10.0
MW-30DR	Antimony (mg/L)	8/3/2018	0.0028
		12/21/2018	<0.003
		6/12/2019	<0.003
		12/4/2019	<0.003
MW-32D	Antimony (mg/L)	6/13/2018	<0.002
		12/12/2018	<0.003
		6/12/2019	<0.003
		12/4/2019	<0.003
MW-30DR	Arsenic (mg/L)	8/3/2018	0.011
		12/21/2018	0.005
		6/12/2019	0.0044
		12/4/2019	0.0055
MW-32D	Arsenic (mg/L)	6/13/2018	0.0034
		12/12/2018	0.0042
		6/12/2019	<0.003
		12/4/2019	<0.003
MW-30DR	Barium (mg/L)	12/21/2018	0.13
		6/12/2019	0.13
		12/4/2019	0.14
MW-32D	Barium (mg/L)	12/12/2018	0.062
		6/12/2019	0.047
		12/4/2019	0.042
MW-30DR	Bis(2-Ethylhexyl)phthalate (µg/L)	8/3/2018	<5.0
		12/21/2018	<1.6
		6/12/2019	<1.6
		12/4/2019	<1.0
MW-32D	Bis(2-Ethylhexyl)phthalate (µg/L)	6/13/2018	<5.0
		12/12/2018	<1.6
		6/12/2019	<1.6
		12/4/2019	<1.0

Proposed Data To Be Added Continued			
Well	Parameter	Date	Result
MW-30DR	Calcium (mg/L)	8/3/2018	96.2
		12/21/2018	120
		6/12/2019	130
		12/4/2019	130
MW-32D	Calcium (mg/L)	6/13/2018	51.4
		12/12/2018	58
		6/12/2019	47
		12/4/2019	46
MW-30DR	Chemical Oxygen Demand (COD) (mg/L)	8/3/2018	51.7
		12/21/2018	64
		6/12/2019	53
		12/4/2019	55
MW-32D	Chemical Oxygen Demand (COD) (mg/L)	6/13/2018	76
		12/12/2018	94
		6/12/2019	75
		12/4/2019	88
MW-30DR	Chloride (mg/L)	8/3/2018	95
		12/21/2018	63
		6/12/2019	88
		12/4/2019	88
MW-32D	Chloride (mg/L)	6/13/2018	230
		12/12/2018	230
		6/12/2019	200
		12/4/2019	220
MW-30DR	Cobalt (mg/L)	8/3/2018	<0.002
		12/21/2018	<0.005
		6/12/2019	<0.005
		12/4/2019	<0.005
MW-32D	Cobalt (mg/L)	6/13/2018	<0.002
		12/12/2018	<0.005
		6/12/2019	<0.005
		12/4/2019	<0.005
MW-30DR	Ethylbenzene (µg/L)	8/3/2018	<2.0
		12/21/2018	<1.0
		6/12/2019	<1.0
		12/4/2019	<1.0
MW-32D	Ethylbenzene (µg/L)	6/13/2018	<2.0
		12/12/2018	<1.0
		6/12/2019	<1.0
		12/4/2019	<1.0

Proposed Data To Be Added Continued			
Well	Parameter	Date	Result
MW-30DR	Iron (mg/L)	8/3/2018	<0.05
		12/21/2018	0.23
		6/12/2019	0.23
		12/4/2019	0.31
MW-32D	Iron (mg/L)	6/13/2018	0.13
		12/12/2018	0.23
		6/12/2019	0.068
		12/4/2019	0.71
MW-30DR	Magnesium (mg/L)	8/3/2018	12.9
		12/21/2018	20
		6/12/2019	22
		12/4/2019	23
MW-32D	Magnesium (mg/L)	6/13/2018	11.2
		12/12/2018	12
		6/12/2019	8.9
		12/4/2019	8.9
MW-30DR	Manganese (mg/L)	8/3/2018	0.36
		12/21/2018	0.56
		6/12/2019	0.56
		12/4/2019	0.57
MW-32D	Manganese (mg/L)	6/13/2018	0.19
		12/12/2018	0.26
		6/12/2019	0.20
		12/4/2019	0.17
MW-30DR	2-Methylphenol (µg/L)	8/3/2018	<10.0
		12/21/2018	<1.0
		6/12/2019	<1.0
		12/4/2019	<1.0
MW-32D	2-Methylphenol (µg/L)	6/13/2018	<10.0
		12/12/2018	<1.0
		6/12/2019	<1.0
		12/4/2019	<1.0
MW-30DR	Total 3&4-Methylphenol (µg/L)	8/3/2018	<10.0
		12/21/2018	<1.0
		6/12/2019	<1.0
		12/4/2019	<1.0
MW-32D	Total 3&4-Methylphenol (µg/L)	6/13/2018	<10.0
		12/12/2018	<1.0
		6/12/2019	<1.0
		12/4/2019	<1.0

Proposed Data To Be Added Continued			
Well	Parameter	Date	Result
MW-30DR	Nitrate/Nitrite (mg/L)	8/3/2018	<0.10
		12/21/2018	<0.02
		6/12/2019	<0.02
		12/4/2019	<0.02
MW-32D	Nitrate/Nitrite (mg/L)	6/13/2018	<0.10
		12/12/2018	<0.02
		6/12/2019	<0.02
		12/4/2019	<0.02
MW-30DR	pH (S.U.)	8/3/2018	8.93
		12/21/2018	7.43
		6/12/2019	8.75
		12/4/2019	7.44
MW-32D	pH (S.U.)	6/13/2018	8.21
		12/12/2018	7.76
		6/12/2019	8.81
		12/4/2019	8.95
MW-30DR	Phenol (mg/L)	8/3/2018	<10.0
		12/21/2018	<1.0
		6/12/2019	<1.0
		12/4/2019	<1.0
MW-32D	Phenol (mg/L)	6/13/2018	<10.0
		12/12/2018	<1.0
		6/12/2019	<1.0
		12/4/2019	<1.0
MW-30DR	Potassium (mg/L)	8/3/2018	12.0
		12/21/2018	9.8
		6/12/2019	9.0
		12/4/2019	9.3
MW-32D	Potassium (mg/L)	6/13/2018	20.6
		12/12/2018	27
		6/12/2019	25
		12/4/2019	26
MW-30DR	Silver (mg/L)	8/3/2018	<0.001
		12/21/2018	<0.005
		6/12/2019	<0.005
		12/4/2019	<0.005
MW-32D	Silver (mg/L)	6/13/2018	<0.001
		12/12/2018	<0.005
		6/12/2019	<0.005
		12/4/2019	<0.005

Proposed Data To Be Added Continued			
Well	Parameter	Date	Result
MW-30DR	Specific Conductivity (µmhos/cm)	8/3/2018	828
		12/21/2018	775
		6/12/2019	867
		12/4/2019	963
MW-32D	Specific Conductivity (µmhos/cm)	6/13/2018	819
		12/12/2018	1,266
		6/12/2019	1,061
		12/4/2019	1,096
MW-30DR	Sulfate (mg/L)	8/3/2018	57.2
		12/21/2018	46
		6/12/2019	69
		12/4/2019	80
MW-32D	Sulfate (mg/L)	6/13/2018	167
		12/12/2018	130
		6/12/2019	130
		12/4/2019	100
MW-30DR	Sulfide (mg/L)	8/3/2018	<0.2
		12/21/2018	<1.0
		6/12/2019	<1.0
		12/4/2019	<1.0
MW-32D	Sulfide (mg/L)	6/13/2018	0.56
		12/12/2018	1.2
		6/12/2019	<1.0
		12/4/2019	<1.0
MW-30DR	Tin (mg/L)	8/3/2018	<0.01
		12/21/2018	<0.002
		6/12/2019	<0.002
		12/4/2019	<0.002
MW-32D	Tin (mg/L)	6/13/2018	<0.01
		12/12/2018	<0.002
		6/12/2019	<0.002
		12/4/2019	<0.002
MW-30DR	Toluene (µg/L)	8/3/2018	<2.0
		12/21/2018	<1.0
		6/12/2019	<1.0
		12/4/2019	<1.0
MW-32D	Toluene (µg/L)	6/13/2018	<2.0
		12/12/2018	<1.0
		6/12/2019	<1.0
		12/4/2019	<1.0

Proposed Data To Be Added Continued			
Well	Parameter	Date	Result
MW-30DR	Total Alkalinity (mg/L)	8/3/2018	257
		12/21/2018	370
		6/12/2019	320
		12/4/2019	370
MW-32D	Total Alkalinity (mg/L)	6/13/2018	126
		12/12/2018	150
		6/12/2019	120
		12/4/2019	160
MW-30DR	Total Dissolved Solids (mg/L)	8/3/2018	539
		12/21/2018	610
		6/12/2019	590
		12/4/2019	570
MW-32D	Total Dissolved Solids (mg/L)	6/13/2018	717
		12/12/2018	730
		6/12/2019	610
		12/4/2019	640
MW-30DR	Zinc (mg/L)	8/3/2018	<0.006
		12/21/2018	<0.01
		6/12/2019	<0.01
		12/4/2019	<0.01
MW-32D	Zinc (mg/L)	6/13/2018	<0.006
		12/12/2018	<0.01
		6/12/2019	<0.01
		12/4/2019	<0.01

Outliers To Be Retained In The Datasets

Well	Parameter	Date	Value (µg/L)
MW-31D	Benzene	12/4/2007	216
MW-32D	Calcium	12/13/2005	245 mg/L
MW-31D	Cis-1,2-Dichloroethene	12/8/2009	1.81
MW-32D	1,1-Dichloroethane	6/13/2018	1.8
MW-32D	1,1-Dichloroethane	6/12/2019	1.8
MW-30DR	Methyl ethyl ketone	12/21/2018	<5.0
MW-30DR	Methyl ethyl ketone	6/12/2019	<5.0
MW-30DR	Methyl ethyl ketone	12/4/2019	<5.0
MW-32D	Methyl ethyl ketone	12/12/2018	<5.0
MW-32D	Methyl ethyl ketone	6/12/2019	<5.0
MW-32D	Methyl ethyl ketone	12/4/2019	<5.0
MW-31D	Total 3&4-Methylphenol	12/2/2008	71.5
MW-31D	Total 3&4-Methylphenol	6/28/2011	71.0
MW-31D	Total 3&4-Methylphenol	12/6/2011	92.7
MW-32D	Total Dissolved Solids	6/2/2009	2,120 mg/L