

INSPECTION REPORT

Inspection Date:	May 28, 2025	Inspection Announced: No
Time:	Entry: 7:50 AM EST	Exit: 12:30 PM EST
Media:	Water	
Statute (s)/Program(s):	Clean Water Act, National Pollutant Discharge Elimination System (NPDES), Industrial	
Type of inspection:	CEI - Compliance Evaluation Inspection	
Access:	Granted	
Permittee Name:	Cleveland-Cliffs Steel Corp. – Mansfield Works	
Facility or Site Name:	Cleveland-Cliffs Steel Corp. – Mansfield Works	
Facility/Site Physical Address:	913 Bowman Street	
(city, state, zip code)	Mansfield, Ohio 44903	
County/Parish:	Richland	
Permit Number:	OH0006840	

Persons Participating in Inspection:					
Title	Name	Phone	Email	Present at Opening Conference	Present at Closing Conference
Physical Scientist, EPA	Matthew Schulte	(312) 886-2405	schulte.matthew@epa.gov	Yes	Yes
Life Scientist, EPA	Megan Bobb	(312) 353-6057	bobb.megan@epa.gov	Yes	Yes
Physical Scientist, EPA	Sophie Bazan	(312) 886-6068	bazan.sophie@epa.gov	Yes	Yes
Environmental Health and Safety Manager	Nathan O'Connor	--	Nathan.oconnor@clevelandcliffs.com	Yes	Yes
Associate Environmental Engineer	Cody Chalfant	--	--	Yes	Yes

Lead Inspector: Matthew Schulte

Matthew Schulte	MATTHEW SCHULTE  Digitally signed by MATTHEW SCHULTE Date: 2025.07.31 15:56:24 -05'00'		
	Region 5	schulte.matthew@epa.gov	(312) 886-2405

Supervisor Review:

Molly Smith	MOLLY SMITH  Digitally signed by MOLLY SMITH Date: 2025.07.31 16:01:41 -05'00'		
	Region 5	smith.molly@epa.gov	(312) 353-8773

SECTION I – INTRODUCTION

Site Entry and Inspection Objectives

Region 5 Lead Inspector, Matthew Schulte, and inspectors Sophie Bazan and Megan Bobb arrived at the Cleveland-Cliffs Mansfield Works Facility (the “Site” or “Facility”), located at 913 Bowman Street, Mansfield, Ohio at 7:30 AM on May 28, 2025, for an unannounced inspection. Inspectors presented their credentials to Nathan O'Connor and informed the Facility that this was an EPA Region 5 inspection to investigate elements of the Clean Water Act (CWA) and the National Pollutant Discharge Elimination System (NPDES) permit program.

The inspection was conducted under the authority of the CWA NPDES permit program and Section 308 of the CWA. The table above identifies the attendees that participated in the inspection.

This report is based on information supplied by Facility representatives, observations made by the Region 5 inspectors, and records and reports maintained by the permittee and Region 5. These include the following: direct observations made by the Region 5 inspectors, photographs taken by Region 5 inspectors, physical evidence collected by Region 5 inspectors, measurements taken by Region 5 inspectors, verbal or written statements made or supplied by Facility representatives (the permittee) during or subsequent to the on-site inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the Region 5 inspectors by Facility representatives during or subsequent to the on-site inspection. In addition, information gathered prior to or subsequent to the inspection from a review of U.S. EPA, State, and public records may be included in this report.

Facility/Site Description

Region 5 Lead Inspector confirmed the following Facility information:

The Facility is a steel mill that specializes in metal sheet production for exhaust pipes in automobiles. The Facility has approximately 300 employees and operates 24 hours per day 7 days a week. Every eight to nine weeks the Facility will perform an outage for maintenance that typically lasts 4 days. There is also a one to two week planned maintenance outage in fall every year. Prior to 2020, the Facility was owned and operated by AK Steel.

The Facility receives a couple tons of raw materials every month. The raw materials received include aluminum, chrome, lime, scrap metal, iron ingots and powder. Water used in the production process comes from the city, but the Facility does have an onsite water well that is used for dust suppression. Production occurs in three main building at the Facility: the melt shop, caster, and hot strip. Water in the melt shop is for non-contact cooling. Water usage in the caster and hot mill includes contact cooling with runoff eventually being discharged to the hot mill pond. All outfalls, but Outfall 001, receive stormwater flows. According to the Facility, Outfall 004 was closed prior to 2010.

SECTION II – OBSERVATIONS

Observations may not be in sequential order.

Unique Identifying No.	Observation	Area of Concern?
MS5-OB-001	During the site tour, inspectors observed a metal sheet in the effluent channel for Outfall 005. (Photo 2)	Yes
MS5-OB-002	During the site tour, inspectors observed a pile of scrap metal and debris near Outfall 006. (Photo 7)	Yes

Unique Identifying No.	Observation	Area of Concern?
MS5-OB-003	During the site tour, inspectors observed new stormwater barriers and filters surrounding storm water drains around the Facility. (Photo 8)	No
MS5-OB-004	During the site tour, inspectors observed various scrap metal debris around the Facility.	Yes

SECTION III – RECORDS REVIEW

Records reviewed may not be in sequential order.

No.	Record
MS5-RR-001	Documents requested during the inspection were received by USEPA on May 30, 2025.
MS-RR-002	Last revision to the Storm Water Pollution Prevention Plan (SWPPP) was on June 9, 2023 to reflect the updated benchmark monitoring schedule.

SECTION V - AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation.

No.	
MS-OB-001	During the site tour, inspectors observed a metal sheet in the effluent channel for Outfall 005. (Photo 2) NPDES Permit Part IV. Stormwater Control Measures and Pollution Prevention Programs. Part C – <u>Minimize Exposure</u> - You shall minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings.
MS-OB-002	During the site tour, inspectors observed a pile of scrap metal and debris near Outfall 006. (Photo 7) NPDES Permit Part IV. Stormwater Control Measures and Pollution Prevention Programs. Part C – <u>Minimize Exposure</u> - You shall minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings.

No.	
	On July 16, 2025, the Facility provided USEPA with documentation of clean-up activities of scrap metal debris around the "Clean Fill Area" near Outfall 006.
MS-OB-004	During the site tour, inspectors observed various scrap metal debris around the Facility. NPDES Permit Part IV. Stormwater Control Measures and Pollution Prevention Programs. Part C – <u>Minimize Exposure</u> - You shall minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings.

SECTION VI – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

The Lead Inspector held a closing conference with Facility personnel on May 28, 2025, for the inspection. During the closing conference, the Lead Inspector discussed the observations and Areas of Concern identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

SECTION VII – LIST OF APPENDICES

Appendix 1 – Photo Log [times listed on images are in Central Standard Time, times listed on left side are in Eastern Standard Time].

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 1	Time: 9:50 AM		
Direction Photo Taken: West			
Photo Description: Outfall 005. Offsite sampling location.			
		File: CCMW_01.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 2	Time: 9:55 AM		
Direction Photo Taken: North			
Photo Description: Outfall 005 effluent channel.			
		File: CCMW_02.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 3	Time: 9:57 AM		
Direction Photo Taken: North			
Photo Description: Outfall 005 effluent storm doors on pipes.			
		File: CCMW_03.JPG	

Cleveland-Cliffs Steel Corp.: Mansfield Works

Inspection Date(s):

May 28, 2025

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 4	Time: 10:03 AM		
Direction Photo Taken: East			
Photo Description: Outfall 006 effluent.			
		File: CCMW_04.JPG	

Cleveland-Cliffs Steel Corp.: Mansfield Works**Inspection Date(s):****May 28, 2025**

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 5	Time: 10:05 AM		
Direction Photo Taken: Northeast			
Photo Description: Outfall 006 influent.			
		File: CCMW_05.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 6	Time: 10:05 AM		
Direction Photo Taken: Northeast			
Photo Description: Outfall 006 influent from Stein Slag Processing. Visible sheen from slag runoff.			
		File: CCMW_06.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 7	Time: 10:09 AM		
Direction Photo Taken: South			
Photo Description: Rocky pile and metal scrap bordering river near Outfall 006.			
		File: CCMW_07.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 8	Time: 10:14 AM		
Direction Photo Taken: South			
Photo Description: Outfall 011 storm drain inlet. Surrounded by new filters.			
		File: CCMW_08.JPG	

Cleveland-Cliffs Steel Corp.: Mansfield Works**Inspection Date(s):****May 28, 2025**

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 9	Time: 10:22 AM		
Direction Photo Taken: East			
Photo Description: Outfall 007.			
		File: CCMW_09.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 10	Time: 10:25 AM		
Direction Photo Taken: West			
Photo Description: Outfall 009 Stein runoff backend.			
		File: CCMW_10.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 11	Time: 10:28 AM		
Direction Photo Taken: West			
Photo Description: Runoff from natural holding pond.			
		File: CCMW_11.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 12	Time: 10:36 AM		
Direction Photo Taken: Northwest			
Photo Description: Smaller hot mill pond with oil skimmer.			
		File: CCMW_12.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 13	Time: 10:36 AM		
Direction Photo Taken: North			
Photo Description: Oil skimmer in hot mill pond.			
		File: CCMW_13.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 14	Time: 10:36 AM		
Direction Photo Taken: Northeast			
Photo Description: Hot mill pond south polyfloc pump.			
		File: CCMW_14.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 15	Time: 10:36 AM		
Direction Photo Taken: Northwest			
Photo Description: Large hotmill north polyfloc recycled water tower.			
		File: CCMW_15.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 16	Time: 10: 41 AM		
Direction Photo Taken: North			
Photo Description: Caster cooling towers.			
		File: CCMW_16.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 17	Time: 10:42 AM		
Direction Photo Taken: down			
Photo Description: Scale pit.			
		File: CCMW_17.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 18	Time: 10:45 AM		
Direction Photo Taken: East			
Photo Description: Drying sludge with runoff channel to hot mill pond.			
		File: CCMW_18.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 19	Time: 10:45 AM		
Direction Photo Taken: North			
Photo Description: Drying channel from sludge to hot mill pond.			
		File: CCMW_19.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 20	Time: 10:47 AM		
Direction Photo Taken: North			
Photo Description: Large hot mill pond.			
		File: CCMW_20.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 21	Time: 10:48 AM		
Direction Photo Taken: East			
Photo Description: Outfall 012.			
		File: CCMW_21.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 22	Time: 10:48 AM		
Direction Photo Taken: East			
Photo Description: Outfall 012.			
		File: CCMW_22.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 23	Time: 10:53 AM		
Direction Photo Taken: West			
Photo Description: Outfall 008. Only gets flow during heavy rain events.			
		File: CCMW_23.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 24	Time: 10:57 AM		
Direction Photo Taken: Southwest			
Photo Description: Used oil storage area.			
		File: CCMW_24.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 25	Time: 11:02 AM		
Direction Photo Taken: North			
Photo Description: Pump hose from well. Water used for dust control.			
		File: CCMW_25.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 26	Time: 11:07 AM		
Direction Photo Taken: down			
Photo Description: Outfall 003			
		File: CCMW_26.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 27	Time: 11:13 AM		
Direction Photo Taken: --			
Photo Description: Outfall 003 influent from offsite.			
		File: CCMW_27.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 28	Time: 11:19 AM		
Direction Photo Taken: North			
Photo Description: Outfall 002. Stormwater only.			
		File: CCMW_28.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 29	Time: 11:24 AM		
Direction Photo Taken: West			
Photo Description: Old cold mill lot.			
		File: CCMW_29.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 30	Time: 11:44 AM		
Direction Photo Taken: East			
Photo Description: Polishing ponds.			
		File: CCMW_30.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 31	Time: 11:46 AM		
Direction Photo Taken: West			
Photo Description: Polishing ponds.			
		File: CCMW_31.JPG	

Cleveland-Cliffs Steel Corp.: Mansfield Works**Inspection Date(s):****May 28, 2025**

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 32	Time: 11:54 AM		
Direction Photo Taken: --			
Photo Description: Outfall 001 sampling station.			
		File: CCMW_32.JPG	

Facility Name & Location: Cleveland-Cliffs Steel Corp.: Mansfield Works 913 Bowman Street Mansfield, Ohio 44903		Photographer: Megan Bobb	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: May 28, 2025			
Photo No.: 33	Time: 11:55 AM		
Direction Photo Taken: down			
Photo Description: Outfall 001.			
		File: CCMW_33.JPG	