

**BEFORE THE ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.**

In Re:

ArcelorMittal Cleveland Inc.

Permit No. OH0000957

NPDES Appeal No. 11-01

**ARCELORMITTAL CLEVELAND INC.'S
REQUEST FOR ORAL ARGUMENT**

ArcelorMittal Cleveland Inc. hereby requests that the EAB order oral argument in the above-captioned matter. Oral argument would assist the Board in its deliberations for the following reasons: (1) the issue of whether effluent limit modifications granted pursuant to Clean Water Act (CWA) Section 301(g) may be subsequently modified is central to this case and an issue of first impression for the Board; (2) this case involves complex statutory and regulatory interpretation issues for seldom-studied portions of the CWA, including Section 301(g) and its implementing regulations, that would benefit from explanation at oral argument; and (3) outstanding Freedom of Information Act (FOIA) requests are expected to produce additional information related to State and regional implementation of Section 301(g) after briefing is completed.

This additional information may have a significant impact on the Board's deliberations, and the parties should have an opportunity to address these issues during oral argument.

Dated: November 4, 2011.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of November 2011, I served by email and regular mail *ArcelorMittal Cleveland Inc.'s Request for Oral Argument* to the following:

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