



Multimedia Consent Decree

2010 Annual Report

Prepared for
U S Environmental Protection Agency
Maryland Department of the Environment

Prepared by
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1.0 Introduction

The Multimedia Consent Decree (Decree), originally entered into by Bethlehem Steel Corporation (BSC), the U.S. Environmental Protection Agency Region III (EPA) and Maryland Department of the Environment (MDE), defines specific actions required at the Sparrows Point facility "Facility" located in Baltimore County, Maryland. The Decree became effective on October 8, 1997 (Civil Action JFM-97-558).

Specific actions outlined in the Decree include requirements for annual reporting of information and activity progress. This report provides information and activity progress for 2010 that was accomplished by Severstal Sparrows Point, LLC (Severstal).

There are three sections in the Decree that require annual reporting of information;

Section VI	Paragraph 4	Waste Minimization Plan,
Section XII	Paragraph 5	Notification and Certification of Documents,
Section XVIII	Paragraph 2	Civil Penalties and Pollution Prevention Credits.

Section VI, Paragraph 4, (Waste Minimization Plan), requires a report on the previous year's status of implementing each Work Plan required under Section VI including sampling data related to hazardous waste regulatory determinations.

Section XII, Paragraph 5, Notification and Certification of Documents, requires a progress report on actions completed as required in Sections V (Corrective Measures Work) and VII (Compliance Requirements) of the Decree.

Annual reports of actual pollution prevention expenditures during the previous calendar year for pollution prevention projects described in Section VI are also required by Section XVIII, Paragraph 2, Civil Penalties and Pollution Prevention Credits.

This Annual Report provides information on actions undertaken in 2010 that comply with the requirements of these three paragraphs. Information is presented in following sections of this report that complies with the reporting requirements of the Decree. Section 2.0 provides the status on the Waste Minimization Plan required in Section VI of the Decree and includes project cost information for the plan as required in Section XVIII. Sections 3.0 and 4.0 provide progress reports as required in Sections V (Corrective Measures) and Section VII (Compliance Requirements) respectively. Section 5.0 presents other supporting information required in Section XII including community relations, spill release reporting and changes to the overall management structure utilized by Severstal to implement the Decree.

2.0 Waste Minimization Plan

A summary of waste minimization activities completed during 2010 is presented in the following sections. To satisfy Decree Section XVIII on pollution prevention expenditures, each section also lists the costs incurred in 2010.

Sump/Tank Work Plan

Description of 2010 Activity:

Sumps and tanks underwent routine periodic inspections as necessary in 2010. No repairs or replacement requirements were identified as a result of the inspections.

Repairs and/or replacements of sumps and storage tanks as specified in the Consent Decree and the approved "Sump/Tank Work Plan and Schedule" were completed in 2003.

Repairs completed for sumps and tanks included the following actions:

- Corrosion repair
- Repainting
- Replacement of structural tank supports and brick foundations
- Concrete joint repair within sumps
- Rubber liner repair for sumps and associated piping
- Installation of epoxy liners for trenches containing pickling acid solutions

2010 Expenditures: \$0

Recycle of Blast Furnace Gas Cleaning Slurry Solids

Description of 2010 Activity:

Full-scale pilot testing and evaluation of technologies have been completed for recycle of blast furnace gas cleaning slurry solids/filter cake. A full-scale pilot hydrocyclone facility was constructed and run successfully during the 2nd to 4th quarter of 2002. The patented hydrocyclone process was shown to effectively remove zinc producing a suitable iron and carbon rich revert (hydrocyclone underflow) for recycling to the Sinter Plant.

The current status and implementation schedule for this project is as follows:

- Phase 1 Engineering – Evaluate current status of water treatment system. This engineering was completed by end of October 2006;

- Phase 2 Engineering – Develop modifications for the water treatment system including solids management and recycling systems. Completed by end of 4th Qtr 2007.
- Capital Project Appropriation Submittal – Develop and provide cost-benefit basis for corporate approval – continuing to re-evaluate the system based on new plant operating plans- evaluation deferred due to the temporary shutdown in the primary side operations – appropriation is planned to be submitted in 3rd quarter 2011 dependent upon the restart of primary operations.
- Implementation/Construction of Project – Anticipated to start 4th quarter 2011 dependent upon the restart of primary operations.

2010 Expenditures: \$0

Recycling of BOF Fume Sludge

Description of 2010 Activity:

A BOF Fume Sludge treatability study was completed in 2009. The purpose of the treatability study was to better define the characteristics of the BOF sludge and to find an additive blend that can produce a material that could potentially be used as road base at Greys Landfill or to be used as structural fill on the plant property.

Pilot testing of briquetted BOF sludge was planned for 3rd quarter 2010 but deferred due to the temporary shutdown of the primary side operations at the facility. A pilot test program will be re-established once primary side operations are restarted.

2010 Expenditures: \$0

Recycling of Humphreys Creek Wastewater Treatment Plant Sludge

Description of 2010 Activity:

Technology review is ongoing to provide an evaluation of various processes to recycle the wastewater treatment plant sludge. Humphreys Creek Waste Water Treatment Plant (HCWWTP) sludge has presented a challenge for recycling because of its oil content and its relatively low concentration of iron. A number of projects have been evaluated over the past few years that were developed to find ways of de-oiling or reusing this sludge and similar materials. These projects were not deemed successful as viewed from the perspective of technology, feasibility or cost. The projects have included biological de-oiling, solvent

extraction de-oiling and calcination. Additionally, reuse of this material in the sinter plant has been further restricted due to air emission limits on volatile organic compounds.

Current levels of oil and grease in the sludge have been lowered as a result of recent waste minimization efforts to eliminate oil and grease discharges to Tin Mill Canal. It is anticipated that Humphreys Creek sludge materials will be evaluated further to determine if they can be cost-effectively de-oiled and pelletized to provide a feedstock to the sinter plant. This study effort will be continued in 2011 in an effort to realize the cost benefits of the iron value in the sludge as well as to reduce the landfill needs of the facility.

2010 Expenditures: \$5000

Maintenance Dredging of the Tin Mill Canal

Description of 2010 Activity:

No maintenance dredging activities were conducted in 2010.

2010 Expenditures: \$0

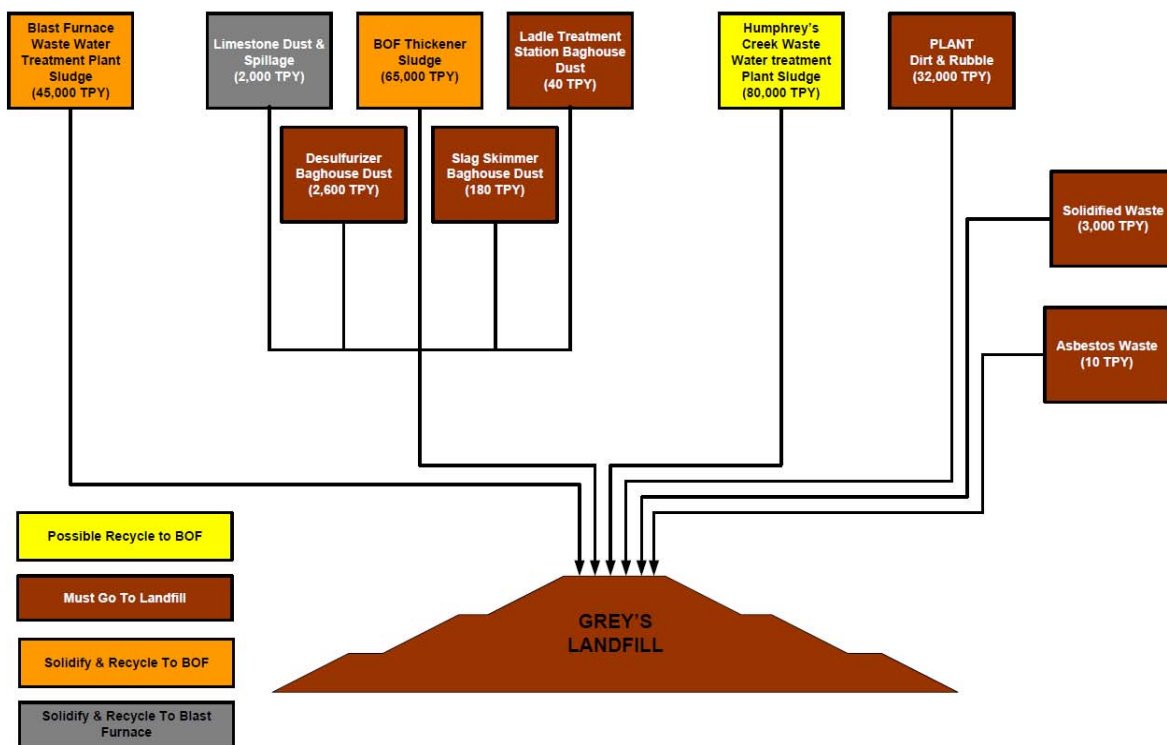
Facility Wide Waste Minimization Plan

A Facility-wide Waste Minimization Plan (October 2006 Plan Update) was submitted in November 2006 in accordance with requirements of the Decree outlined in Section VI, Paragraph 3.c.

Goals and effectiveness of the Waste Minimization Program at Sparrows Point will continue to be evaluated as part of the requirements of the Consent Decree as well as with the environmental management system implemented at the facility in conjunction with the ISO 14001 certification received by the facility.

Revert and Emission Control Sludge Recycling and Reuse Program

The following schematic shows efforts that are ongoing to recycle and minimize revert and emission control sludges that are currently generated at the facility. Pilot and field testing of possible recycle options are either underway or will be scheduled with capital projects for the facility.



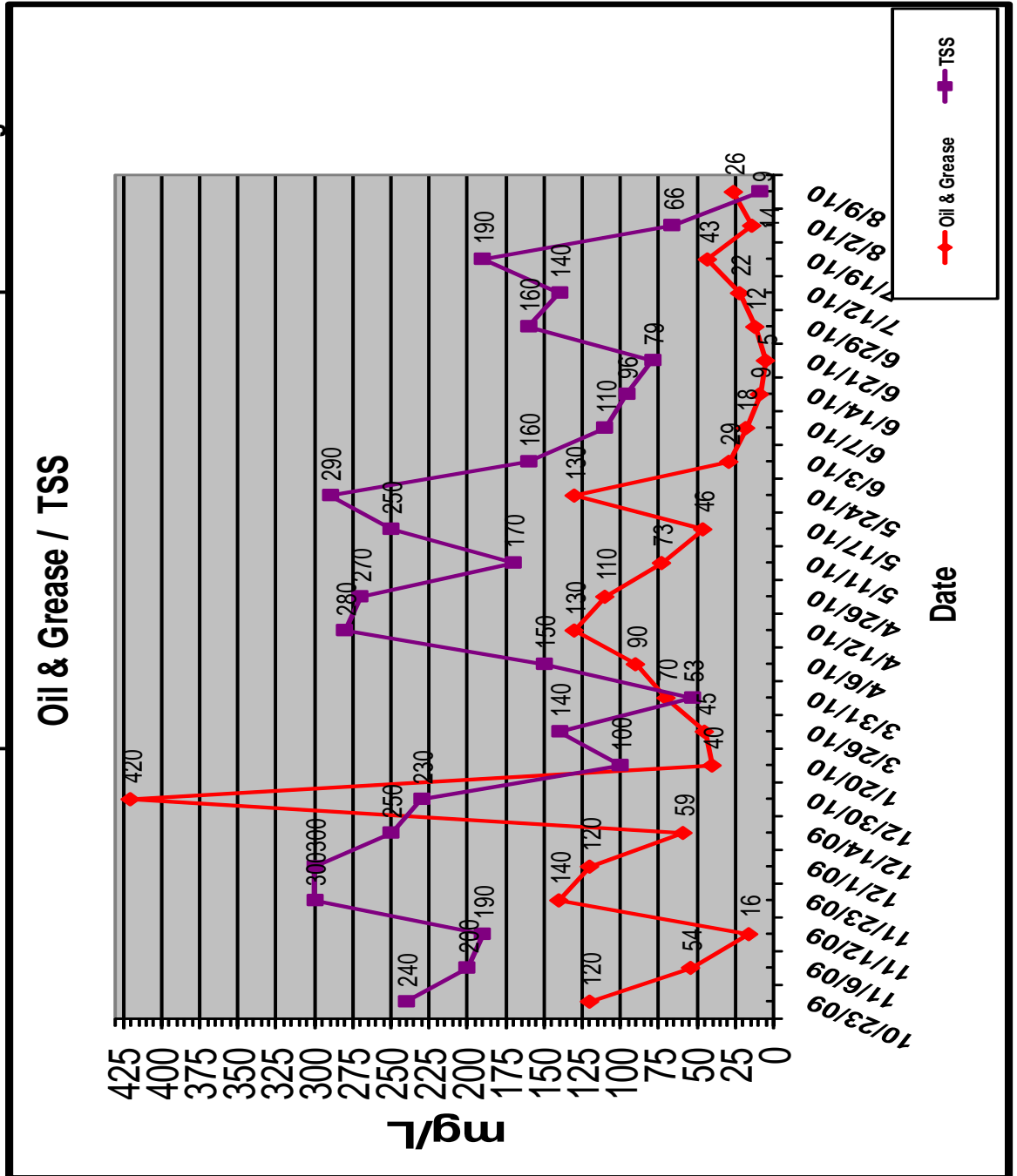
Revert Block Facility

A revert block facility is being considered to support the recycling of facility generated revert materials into the ironmaking and steelmaking processes. Reverts include mill scales and other materials that have sufficient iron content to be useful as raw materials for the processes. The facility would bind the reverts with additives (typically cement) to produce blocks (or pucks) suitable for use as feedstock ingredients for the ironmaking and steelmaking processes.

Reduce lubricating oil use at Hot Mill and Subsequent Discharges to Tin Mill Canal

The following graph demonstrates continuing waste minimization efforts at the Hot Strip Mill to reduce oil use and subsequent concentrations of oil and grease and suspended solids in wastewater discharges that require on-site treatment. The graph presents oil and grease and total suspended solids data for wastewater discharges from the Hot Strip Mill during 2010. Substantial reductions are shown in 2010 for both constituents that were as a result of increased maintenance and efficiency efforts at the operation. Reduced oil and grease and suspended solids in the wastewater discharge from the Hot Mill led to reduced treatment requirements for the wastewater and associated Humphreys Creek Wastewater Treatment Plant sludge production.

Oil and Grease and Total Suspended Solids Concentration in Hot Strip Mill Discharge



3.0 Corrective Measures

Paragraph 5 of Section XII of the Decree requires a description of the work undertaken in Sections V (Corrective Measures) and VII (Compliance Requirements) of the Decree. This section provides a status report for corrective measures projects included in Section V of the Decree as follows:

- Rod & Wire Mill Sludge Bin Remediation Area
- Site Wide Investigation
- Coke Oven Area Interim Measure

Rod & Wire Mill Sludge Bin Remediation Area

During 2010, Severstal Sparrows Point, LLC operated the groundwater pump and treat Interim Measure at the former Rod & Wire Mill Sludge Bin Storage Area at Sparrows Point in accordance with the scope and schedule submitted in the July 2000 *Work Plan for Re-Establishment of Interim Measures, Former Sludge Bin Storage Area, Rod & Wire Mill* that was approved by U. S. EPA on November 3, 2000. The interim measure tasks included:

- Maintaining institutional controls at the former *in situ* leaching area,
- Groundwater treatment system monitoring, operation and maintenance,
- Semi-annual groundwater elevation monitoring, and
- Semi-annual sampling and analysis of groundwater.

Specifics of the interim measures tasks completed in 2010 are as follows:

- Institutional controls were maintained at the former sludge bin storage area to minimize and manage activities that could disturb soils at the site. These controls consist of notice sign boundary markers and continuation of an authorization program to conduct work in the area.
- Operation and maintenance of the groundwater recovery wells, transfer pipeline and treatment process equipment located at the existing wastewater treatment facility.
- Evaluation of the groundwater pump and treat system, including documentation of treatment flow, review of semi-annual groundwater elevation data, and review of effectiveness.
- Semi-annual sampling, analysis and evaluation of the groundwater impacted by former operations at the sludge bin storage area.

A total of 5,135,229 gallons of water was extracted from the two Former Sludge Bin Storage Area groundwater pumping wells (RW15-PZM020 and RW10-PZM020) during 2010. This compares to 6,801,611 gallons extracted in 2009. The average total pumping rate for 2010 was 14,069 gallons per day (gpd), or 9.8 gallons per minute (gpm). A total of 211 pounds (lbs) of cadmium and 11,835 lbs of zinc were removed and treated during 2010. This compares to 281

lbs of cadmium and 14,055 lbs of zinc removed in 2009. The decrease in mass removal of cadmium in 2009 compared to 2010 is due to a combination of reduced cadmium concentrations in groundwater at the pumping wells and a reduction of the volume of extracted groundwater. The reduction in the mass of zinc is due to reduced extracted groundwater.

Groundwater elevation data indicate groundwater drawdown with a radius of influence that captures the contamination plume in the intermediate groundwater zone (approximately 20 to 30 feet below the ground surface) at the average annual 2010 pumping rate of 5.0 gallons per minute (gpm) for recovery well RW15-PZM020 and 4.8 gpm for recovery well RW10-PZM020. The groundwater elevation data for the shallow zone (groundwater table surface to 15 feet below this surface), combined with the chemistry data, document a water table situation where contamination migration is effectively controlled in this groundwater zone. Groundwater elevation data for the deeper groundwater zone (greater than 50 feet in depth) suggest that heads in this zone may not be influenced by the pump and treat system; however, the chemistry data (further discussed below) indicate that this zone is minimally impacted. Groundwater monitoring data collected during 2010 suggests some improvement in groundwater quality as compared to 2009.

Cadmium—Cadmium concentrations in the two pumping wells (RW10-PZM020 and RW15-PZM020) are generally similar to concentrations observed in recent prior years. At most of the non-pumping wells the 2010 cadmium concentrations are also similar to prior years. An exception is RW06-PZM001 where the 2010 4th quarter cadmium concentration (24 mg/l) was unreasonably higher than historically has been observed and is considered to be a non-representative outlier to be monitored going forward.

Zinc—Zinc concentrations in the two pumping wells (RW10-PZM020 and RW15-PZM020) are generally similar to concentrations observed in recent prior years. At most of the non-pumping wells the 2010 zinc concentrations are also similar to prior years. An exception is RW06-PZM001 where the 2010 4th quarter zinc concentration (160 mg/l) was an anomalous result outside the statistical norm as has been historically observed and is considered to be a non-representative outlier to be monitored going forward.

The Proposed Operating Plan for 2011 is to: maintain institutional controls at the former storage area, continue operation, maintenance, and monitoring of the groundwater pump and treat system and complete semi-annual monitoring of groundwater consistent with procedures outlined in the approved July 2000 Work Plan.

Site Wide Investigation

Work completed for the Site Wide Investigation during 2010 included the following activities:

Ecological Risk Assessment Program

Milestones achieved for the Ecological risk Assessment Program in 2010 include:

- Submitted to the agencies for review - **Draft *Baseline Ecological Risk Assessment for On-Site Areas (BERA) Report*** (August, 2010, URS). The BERA was conducted for the Severstal Sparrows Point Facility in accordance with the requirements of the referenced Consent Decree. The BERA characterized risks for valued wildlife receptors from exposure to surface soil and on-site sediment and/or surface water and provided data to support future decisions regarding the need for and potential extent of on-site remediation.

This tier of the ecological risk assessment process follows a *Screening Level Ecological Risk Assessment for On-Site Areas* (URS 2009a) and a *Supplemental Report, County Lands Parcel 1B Ponds* (URS 2009b) (collectively, the SLERA) that were originally submitted to the agencies in April 2008 and January 2009, respectively. Comments on the draft SLERA reports were received from EPA on February 25, 2009. The SLERA reports were subsequently revised and re-submitted to USEPA in April and May 2009. USEPA completed review of the revised reports and determined that the clarifying responses were acceptable with some additional exceptions that were outlined in correspondence dated July 9, 2009. Final responses and associated revisions on the SLERA were completed and submitted to EPA in August 2009.

Ecological Risk Assessment Program Background

An ecological risk assessment program for the facility was developed and presented to the agencies on November 21, 2005. A path forward for ecological assessment tasks was agreed to on November 21, 2005. The proposed steps were as follows:

- Gain approval of strategy for evaluating ecological risks at the site from the USEPA and the Maryland Department of the Environment (MDE);
- Participate in a coordinated site visit with the USEPA to facilitate their understanding of the potential ecological issues at the Site;
- Conduct qualitative ecological surveys of on-site and off-site areas. The on-site and off-site surveys may be conducted at different times;
- Develop ERA Work Plan. Components to be factored into the Work Plan include:
 - Tiered approach consisting of completion of the SLERA, followed by the BERA, if necessary. It is assumed that the SLERA will include, in addition to a quantification of on-site screening-level risks, a comparison of groundwater

concentrations to ecological surface water benchmarks. The results and conclusions of the SLERA will determine the need for a BERA.

- Development of on-site Work Plan. Plan will identify areas of overlap between suitable ecological habitat and areas potentially impacted by SWMUs and AOCs, and identification of potential receptors in these areas of overlap;

The strategy document for the ecological risk assessment tasks at Sparrows Point was submitted for approval in February 2006. Comments were received from the US EPA in March 2006 and, where applicable, were incorporated into the development of the On-Site Ecological Work Plan.

The *Ecological Risk Assessment Work Plan for On Site Areas* was developed and submitted for agency review in June 2006. Based on the agreed upon approach for the facility, the *Ecological Risk Assessment Work Plan for On Site Areas* was finalized and submitted to the agencies in January 2007.

Groundwater Discharge Assessment Work Plan

On October 13, 2009 Severstal submitted to MDE and EPA a work plan to investigate potential Coke Oven Area/Coke Point Area (CO/CP) offshore current groundwater discharge impacts (*Sediment, Surface Water, and Groundwater Sampling Plan to Assess Current Groundwater Discharge Impacts to the Offshore Environment*, October 2009, URS). The two primary sampling plan objectives are:

- **Objective 1**— Assess Potential Current Groundwater Impacts to Surface Water Surrounding the Entire CO/CP Area Peninsula
- **Objective 2**— Assess Groundwater to Surface Water Migration Pathways and Evaluate Offshore Sediment Pore Water

The agencies responded to the work plan submittal on February 3, 2010 with a letter that disapproved, in part, the Work Plan. In response to the February 3, 2010 disapproval of the October 2009 work plan, Severstal triggered the dispute resolution provisions of the Consent Decree. After informal dispute resolution was unsuccessful, the disagreement was submitted to United States District Court through the filing of a Petition on July 30, 2010. A response to the Petition was filed by EPA on October 16, 2010. Pursuant to a Court hearing on December 20, 2010, the initial focus of the proceeding is on the effect of the Bethlehem Steel bankruptcy and associated bankruptcy documents on Severstal's obligations under the Consent Decree with respect to offsite contamination.

In addition to triggering the dispute resolution provisions of the Consent Decree, a revised Work Plan entitled *Work Plan to Assess Offsite Ecological Impacts from Current Releases from the Five Special Study Areas* was submitted for consideration by the agencies on April 2, 2010. The nature and the scope of the Work Plan reflected Severstal's willingness to undertake the environmental obligations that it is legally responsible for as the current owner of the Sparrows Point facility.

In this regard, Severstal's obligation with respect to offsite contamination is limited only to the investigation of current releases to offsite locations.

The revised work plan presented a step-wise investigation that was developed to address USEPA and MDE concerns over current offsite releases from the Site. In the first instance, the scope of this work plan focuses on investigating and providing pathway assessments for potential current offsite releases from the five Special Study Areas (SSAs). Should current pathways exist to the offshore environment from the SSAs that also exhibit site-related chemicals above relevant screening levels, sediment and surface water characterization of potentially off-site affected areas would be conducted. To the extent that additional areas of the Site identified in the *Description of Current Conditions* report (Rust 1998) will need to be investigated to assess their potential current contribution of Site-related chemicals to the offshore environment, this work will be completed as a separate work plan. Severstal is proposing to implement and complete the investigation of the potential current groundwater and stormwater releases from the five SSAs prior to initiating any activities related to this additional, Balance of Site work.

The agencies responded to the revised work plan submittal on August 25, 2010 with a letter that disapproved the Work Plan. In response to the August 25, 2010 disapproval of the April 2, 2010 work plan, Severstal triggered the dispute resolution provisions of the Consent Decree.

Coke Oven Area Interim Measures

Summary

In its letter dated February 19, 2009, EPA required that Severstal submit an Interim Measures (IM) work plan to recover hydrocarbons from groundwater at the Coke Oven Area (COA), under the applicable Consent Decree for this facility. Accordingly, Severstal submitted to EPA in April 2009 a work plan to conduct pilot testing of soil vapor extraction (SVE), air sparging (AS), and groundwater pumping. The work plan was revised based on comments received by the agencies and resubmitted in July, 2009. EPA approved this work plan in their letter dated August 24, 2009.

IM pilot testing was conducted at the COA during October/November, 2009. Proposed IMs designs were developed including:

- Prototype AS/SVE Systems
- Enhanced in-situ Anaerobic Biological Remediation (AB) systems
- Light (i.e., floating on water) non-aqueous phase liquid (LNAPL) recovery

Based on the pilot test findings, and in accordance with the approvals received from US EPA on March 2, 2010 and September 2, 2010 as revised January 13, 2011, interim measures (IMs) have been developed to address identified environmental conditions at the Coke Oven Area (COA) Special Study Area. Six (6) IM "Cells" have been designed for implementation at the COA:

- Cell 1: Prototype Air Sparge/Soil Vapor Extraction (AS/SVE) System in the Former Benzol Processing Area,
- Cell 2: AS/SVE and Dual Phase Groundwater Extraction System in Former Coal Storage Area,
- Cell 3: AS/SVE System in "Cove" Area,
- Cell 4: In-Situ Anaerobic Bio-treatment Area in Coal Tar Area,
- Cell 5: Groundwater Extraction at the Turning Basin Area, and
- Cell 6: Light Non-Aqueous Phase Liquid (LNAPL) Recovery at the Former Benzol Processing Area.

Coke Oven Area Interim Measures Progress

Cells 1 and 6 were installed and had continuing operations during 2010. The other Cells are in various stages of evaluation, design, and under permitting considerations by Maryland Department of the Environment (MDE). The work for the other cells is being conducted in accordance with the requirements outlined in the revised approval letter received from US EPA on January 13, 2011. Details for efforts completed in 2010 are as follows.

Cell 1

Cell 1 consists of a prototype IM, which includes AS/SVE coupled with vapor destruction via an ICE unit. Design of this system includes air sparging groundwater wells and vapor collection trenches with the following major components:

- Three (3) generally parallel and interconnected vapor collection trenches approximately 500 feet long and 60 feet apart, fitted with perforated 4-inch DR-17 high-density polyethylene (HDPE) pipe. 15 vertical extraction risers are connected to a common suction header,
- 16 air sparge wells located between the trenches,
- At-grade, 4-inch DR-17 HDPE sparge and suction headers fitted with control valves for 2-inch DR-17 HDPE sparge and suction laterals,
- One (1) ICE unit for extraction vacuum and vapor destruction, which is equipped with an integral Becker KDT series air compressor for sparge air, and
- Perimeter slag berm for system demarcation and protection from vehicular traffic.

Construction of the prototype Cell 1 AS/SVE system began in May 2010 and was subsequently completed by July 23, 2010 when preliminary startup/shakedown of the system was initiated.

Several days of initial system testing were completed and the prototype operation began on August 2, 2010.

During 2010, the AS/SVE technology installed in Cell 1 removed approximately 1840 pounds of hydrocarbons from the groundwater at hydrocarbon removal rates averaging approximately 2 pounds per hour. The system underwent several field trial programs to evaluate removal rates for various operating scenarios to most efficiently remove hydrocarbons from the groundwater. Based on the operational performance results during 2010, the AS/SVE prototype design installed in Cell 1 has been determined to be a successful technology for continued use as an interim measure for this area.

To support continued operation of AS/SVE at Cell 1, system modifications were installed to permit cold weather operation of the Cell 1 remediation system. These modifications included:

- 1) Relocation of the ICE unit and associated influent and effluent piping,
- 2) Installation of sloping and intermediate collection containers to permit condensate removal from the soil gas collection piping (suction headers and lateral lines), and
- 3) Installation of appropriate insulation and protection for the collection lines and ICE unit.

The modifications were installed during December 2010 and January 2011 and the system re-started on January 24, 2011.

Modifications to the Cell 1 prototype system are also currently being designed to support continued longer-term operation of the AS/SVE interim measure remedial action in this area. Data collected during the operational period indicates that remedial actions in this area will be more efficiently conducted with the use of an electrically powered air compressor and catalytic oxidizer vapor destruction unit. Design of these system modifications is underway and will be installed in 2011, along with appropriate modifications to the existing air permit. The existing ICE unit will continue to operate in the intervening period. The system modifications will also include measures to either maximize hydrocarbon concentration in the extracted soil gas or maximize the treatment area to increase the effectiveness of the remedial measure.

Cell 4

US EPA's March 2, 2010 letter approved the in-situ bio-treatment concept for Cell 4. In July 2010, baseline groundwater data and a microbial conditions evaluation using Bio-Trap® Samplers (Bio-Traps) were performed as the first steps to developing a preliminary conceptual design. The groundwater samples were collected on July 9, 2010 and on July 12, 2010, Bio-Traps were deployed in OBS-6 and OBS-7 to evaluate subsurface conditions to define in-situ bio-treatment conditions and to provide data to support the design of the amendments needed for in-situ bio-treatment. The traps were left in the wells until August 16, 2010 and sent for analysis to Microbial Insights Laboratories located in Rockford, Tennessee.

Results of the Bio-Trap analyses reported a colonizing population that did not demonstrate either slowed growth or decreased cellular permeability. This means that there is no indication that the indigenous Proteobacterial population is feeling the effects of any environmental stresses. When this information is coupled with Site geochemistry, it appears that the two observation wells are inhabited by healthy microbial populations that are actively degrading benzene and naphthalene under iron-reducing and sulfate-reducing conditions.

Evaluation and design work for the in-situ enhanced anaerobic bioremediation system at Cell 4 continued during 2010. Severstal is moving forward toward designing, installing, and operating the planned in-situ enhanced anaerobic bioremediation system at Cell 4. The design activities for Cell 4 are on track to meet the final design submittal date of April 1, 2011 as outlined in the January 13, 2011 revised approval letter from the US EPA.

Planned activities include:

1. Design and install a groundwater re-circulation system to deliver bionutrients to the subsurface.
2. Supplement the depleted nutrients that are necessary to support general microbial activities, including nitrate and phosphorous. Commercially available bionutrients (such as VB591 from BioNutra Tech) are being evaluated.
3. Monitor the progress of target compound degradation and microbial activities by sampling and analyzing groundwater as necessary.

Cell 6

Cell 6 activities completed and associated progress are summarized for 2010 as follows:

- January 2010, an automated oil skimmer and 500-gallon storage tank were installed at BP-MW-05, an existing 2-inch diameter monitoring well using a solar-powered and nitrogen gas-powered, automatic light non-aqueous phase liquid (LNAPL) recovery system.
- Two (2) new 4-inch-diameter recovery wells were installed (RW-1 and RW-2 in late May 2010 and redeveloped in mid-June 2010.
- In late July 2010, a new oil skimmer and 500-gallon tank were installed at existing wells BP-MW-08 and BP-MW-11.
- In early September 2010, three (3) new 4-inch diameter recovery wells (RW-3, RW-4 and RW-5) were installed, the oil skimmer and storage tank at BP-MW-11 were moved to RW-04 due to low production from BP-MW-11),

The recovery systems have undergone approximately weekly monitoring and maintenance since January, 2010. Total recovered LNAPL in 2010 is estimated at 2,617 gallons (19,175 pounds) as of December 28. The LNAPL was recovered from the following wells:

Well	LNAPL Recovery (gal/lbs)		Notes
	During December	Total thru December 28	
BP-MW-05	287 / 2,103	2,197 / 16,098	
RW-04	47 / 344	264 / 1,934	
BP-MW-08	33 / 242	147 / 1,077	
BP-MW-11	0 / 0	7.8 / 57	(a)
RW-1	0.3 / 2	0.6 / 5	(b)
RW-3	0.3 / 2	0.5 / 4	(b)

(a) Recovery system moved from BP-MW-11 to BP-MW-08 on September 8, 2010.

(b) Manual bailing.

The range of LNAPL thicknesses has varied, as of December 2010, the thicknesses are as summarized below (wells are not listed if LNAPL was not present):

- BP-MW-05 (1.63 to 2.14 feet),
- RW-04 (0.13 to 0.80 feet),
- BP-MW-08 (0.09 to 0.82 feet),
- BP-MW-11 (0.10 to 0.11 feet),
- BP-MW-10 (0.14 to 0.32 feet),
- RW-1 (0.12 to 0.16 feet),
- RW-2 (0.08 to 0.12 feet), and
- RW-3 (0.21 to 0.23 feet).

LNAPL was not observed in wells RW-5, BP-MW-07, BP-MW-06, BP-MW-09, or CO19-PZM004.

The existing LNAPL recovery systems will be operated in 2011 with periodic adjustments to the pumps and other components to maximize product recovery.

4.0 Compliance Requirements

Paragraph 5 of Section XII of the Consent Decree requires a description of the work undertaken in Sections V (Corrective Measures) and VII (Compliance Requirements) of the Decree. Projects included in Section VII are as follows:

- Visible Emissions from BOF Shop Roof Monitor
- Kish Reduction
- Coke Point and Greys Landfill Operation

Visible Emissions from BOF Shop Roof Monitor

Monitoring for the compliance requirements for visible emissions from the Basic Oxygen Furnace (BOF) Shop roof monitor during 2010 was conducted in accordance with the requirements outlined in the Maryland State Implementation Plan (SIP) that was promulgated by the State of Maryland on 10/2/2000 and approved by the US EPA on 11/6/2001 as provided for in Section VII Paragraph A.4. and Section XVII 1.c. of the Consent Decree. With approval of the SIP by the US EPA, compliance requirements for visible emissions from the BOF Shop roof monitor are now implemented by requirements of the SIP and not the Consent Decree.

Kish Reduction

Kish reduction requirements outlined in the Consent Decree and subsequent tasks associated with approved kish reduction work plans have been completed. Ongoing components of kish reduction activities at the facility are the maintenance of control structures and equipment for kish emissions from BOF slag skimmer ladle dumping and Blast Furnace dust catcher operations.

BOF Slag Skimmer Ladle Dumping

In August of 2003, the Skimmer Slag Ladle Dumping process was relocated to the No.2 Soaking Pit Building located northeast of the Caster. This structure provides cover that controls and significantly reduces fugitive kish emissions from the dumping of slag ladles from the slag skimming operation. Originally this process was to be moved under cover in the No 4 Open Hearth Building but was relocated because the open hearth was slated for demolition.

Ongoing inspections and maintenance of the No 2 Soaking Pit Building were completed in 2010. Facility personnel performed routine inspections of the building, dumping areas and dumping procedures completed by the contractors.

Blast Furnace Dust Catcher

A wet dust suppression system has been established for the blast furnace dust catcher discharges. This system operates to reduce fugitive dust from the dust catcher operation in

accordance with requests from the Maryland Department of the Environment to control these discharges.

Coke Point and Greys Landfill Operation

The Consent Decree required the preparation of a landfill operations plan and an engineering plan for Greys Landfill and Coke Point Landfill (Landfill Compliance Plan). The Landfill Compliance Plan was submitted on July 15, 1998. The Consent Decree also required the submittal of a plan and timetable for future uses and closure of the landfills. This document was prepared and submitted by BSC on April 8, 1999.

Activities conducted in 2010 for the landfills were as follows:

Greys Landfill

Landfill Compliance Improvements

Approved landfill compliance improvements at Greys Landfill were initiated in 2005 and completed in 2008. A summary of activities completed for Greys Landfill is as follows:

Items Completed:

- Sediment/stormwater storage basin and outlet controls
- Final stormwater controls and stormwater swales
- Cement Deep Soil Mixing Stabilization Program
- Clearing and Grubbing
- 3-ft diversion swale excavated and riprap lined
- Landfill counter berms and slope regrading
- Final cap system to elevation 85
- Final seeding and slope stabilization measures

The landfill continues to operate in accordance with the approved landfill operations and engineering plan.

Groundwater Monitoring Program

A groundwater monitoring program has been instituted as part of the compliance program for Greys Landfill. The program initially consisted of a quarterly sampling program for thirty-one monitoring wells that was conducted for one year starting in the 3rd quarter of 2009. In 2009, two quarterly groundwater sampling events were conducted for an agreed to well monitoring network and results were submitted in January 2010 (*Greys Landfill, 2009 Groundwater Monitoring Report*, KCI 2010). This semi-annual monitoring report summarizes groundwater-monitoring results at Greys Landfill during the second half of 2009 and was meant to fulfill the applicable environmental monitoring requirements of the MDE letter dated May 27, 2009 with the subject "Ground water monitoring / compliance requirements Greys Landfill".

The annual quarterly groundwater monitoring program continued in 2010 for which the monitoring wells were sampled twice on a quarterly basis starting in March 2010. Results were submitted in September 2010 (*Greys Landfill Groundwater Monitoring Report for the 1st half of 2010*, KCI 2010). The report summarizes groundwater monitoring results for the 1st half of 2010 and provides an annual summary of results for all monitoring wells that have been sampled quarterly for one year. This report fulfilled the applicable environmental reporting requirements of the MDE letter dated May 27, 2009 for quarterly sampling events to be conducted at Greys Landfill for one year. The report also provided recommendations for continued monitoring at Greys Landfill that are consistent with normal practices of the Department for landfill groundwater compliance monitoring programs.

The following data collection activities occurred during the first half of 2010;

- Quarterly water level measurements in monitoring wells;
- Quarterly sampling of monitoring wells; and
- Laboratory analysis of monitoring well samples.

Results of the above investigations were presented in the referenced report and included:

- Provides monitoring well completion logs and a summary of well completion information;
- Provides field data sheets and laboratory reports documenting groundwater sample collection;
- Presents the water level data collected;
- Provides laboratory reports for sample analyses;
- Tabulates laboratory analytical data in time-series format;
- Discusses the water quality results;
- Includes a topographic map based on 2009 aerial photogrammetry with monitoring well locations posted; and
- Includes two groundwater contour maps.
- Includes other tables and figures developed to present the monitoring information.

In consultation with MDE, a groundwater sampling and analysis plan has been developed for Greys Landfill for the first half of 2011. The 2011 plan was submitted to MDE on December 15, 2010 for approval. It is anticipated that the plan will be approved to support sampling in the first quarter of 2011.

Coke Point Landfill

Landfill Compliance Improvements

Coke Point Landfill is currently utilized for the management of the following non-hazardous waste materials, annual waste quantities are expected to range between 25,000 to 75,000 cubic yards when the primary side of the facility (ironmaking and steelmaking) is in operation;

- Waste debris generated from the “rubble pit” associated with steelmaking operations at the Basic Oxygen Furnace;
- Waste slag debris from the slag skimmer bowl metal reclamation operations;
- General debris from the Sparrows Point facility that can be generated from industrial, construction, demolition and other activities occurring on the grounds of the facility;

Plans for a new landfill to be located proximate to Greys Landfill on the northern portion of the property are in the permitting process. It is a facility goal that waste management will occur solely at the new landfill and, once permitted and constructed, Coke Point Landfill will be phased out and secured. The compliance program outlined in the work plan provides operating practices for the current landfill operations.

In addition, the Maryland Port Authority (MPA) has expressed interest in acquiring portions of Coke Point for use as a dredged material containment facility. If this project moves forward, certain aspects of the compliance activities may need to be adjusted or amended to accommodate MPA’s development plans.

In conjunction with this effort, Severstal is implementing interim compliance activities to support the current operating status of the landfill facility. The activities were identified in an updated compliance plan submitted to the MDE on June 25, 2010 that addressed Coke Point Landfill operational requirements outlined in a MDE correspondence dated January 8, 2010 as further modified by discussions agreed to in a meeting with MDE on May 26, 2010. Procedures have been developed to address the landfill operational items and were approved by MDE on September 9, 2010. The procedures are consistent with requirements outlined in Section VII of the Multimedia Consent Decree as appropriate for the planned use of the landfill facility. Action items that have been identified for Coke Point Landfill include the following:

- Delineate the actual footprint of the Coke Point Landfill;
- Provide access and security improvements to mark the boundaries of the Coke Point Landfill and restrict access to authorized users;
- Implement improved operating and waste management practices;

- Provide waste characterizations to document compliance with acceptable waste disposal practices;
- Implement groundwater monitoring program;
- Evaluate options for control and monitoring of surface water runoff at potential outfall locations;
- Provide slope stabilization and waste covering plan;

A revised operating manual for Coke Point Landfill was submitted to MDE on October 22, 2010. The manual provides updated site information, waste acceptance procedures, operating procedures and associated requirements to be implemented at the landfill in support of environmental protection. Access and security improvements, improved operating procedures and waste management practices were implemented in 2010.

Design work is currently underway to evaluate options for slope stabilization and waste covering requirements. It is anticipated that this work will continue in 2011 with plans submitted to MDE for review in the second quarter of 2011.

A groundwater sampling and analysis plan has been developed for Coke Point Landfill for the first half of 2011. The 2011 plan was submitted to MDE on December 15, 2010 for approval. It is anticipated that the plan will be approved to support sampling in the first quarter of 2011.

5.0 Decree Management Reporting

Community Relations

There were several community relation activities during the year, but none more noteworthy than the commitment made by Sparrows Point to continue a community outreach plan in support of communication efforts for the Multimedia Consent Decree environmental projects. The intent of the community outreach plan is to provide a forum for discussion of community interests and concerns and maintain ongoing and proactive relations with local community participants and regional environmental organizations. Through past interactions with the public Severstal is aware of the public's interest in maintaining effective, open, on-going communications. It is Severstal's expectation that this partnership with the community will help enable early and continued two-way flow of information, concerns, and expectations.

“The mission of Severstal Sparrows Point Community Outreach is to foster a relationship of respect and understanding through mutual involvement, communication and support”

Community Leader Meetings

Community leader meetings were held in January and June 2010 with letters of invitation sent to civic, business, environmental and community organizations representing the closest local communities and neighborhoods as well as the larger surrounding area. The leadership group is expected to help disseminate information back to the community through their own organizations, as well as keep Severstal apprised of community concerns. The group is actively engaged with a variety of community improvement issues, of interest to both the Sparrows Point facility and its surrounding neighborhoods, including but not limited to environmental issues. Invitees included:

US EPA Region 3
Maryland Department of the Environment
Maryland Port Administration
Baltimore County
Senator Norman Stone
Councilman John Olszewski
Delegate John Olszewski, Jr.
Delegate Joseph Minnick
Delegate Michael Weir
Baltimore Harbor Waterkeeper

Chesapeake Bay Foundation
Greater Dundalk Alliance
Greater Dundalk Community Council
North Point Community Coordinating Council
Turners Station
Dundalk Renaissance Corporation
Watersedge
Hart-Miller Oversight Committee
Community College Baltimore County
West Inverness Community Association
United Steelworkers
Millers Island/Edgemere Business Association
Wells McComas Citizens Improvement Association
Dun-Logan Community Association
Sparrows Point High School
Dundalk Chamber of Commerce
Millers Island Community Association
Local Business Representatives
Eastfield-Stanbrook Civic Association

It is anticipated that the community leader meetings will be held on a periodic basis in 2011.

Newsletters

Newsletters are planned to be developed to be distributed at community leader meetings or at key milestones associated with activities at the Sparrows Point facility. The newsletters are intended to explain specific issues and consent decree activities in an easy to understand manner. A newsletter was developed and distributed at the January and June 2010 community leader meeting.

Project Management

Project management at the Sparrows Point facility for the Consent Decree includes Mr. Russell Becker, project coordinator for the Consent Decree. URS Corporation has been selected as a subcontractor to support activities associated with Section V of the Consent Decree. Notification of the change in project coordinator was provided in accordance with Section X on October 22, 2008.

Release Reporting

Appendix B contains spill reports for the facility that were reported in 2010. These reports document the status of mitigation of the releases, and the government oversight agency, contact name and telephone number.

APPENDIX A RELEASE REPORTING RECORDS



February 22, 2009

CERTIFIED RETURN RECEIPT REQUESTED

Mr. Greg Sonberg
Maryland Department of the Environment
Oil Control Program
1800 Washington Boulevard Suite 620
Baltimore, Maryland 21230-1708

Dear Mr. Sonberg:

This letter, and its attachment, will serve as the spill report for Severstal Sparrows Point, LLC for the Month of January, 2010. There were no spills during the month.

If there are questions please refer them to Joe Dolan, of my staff, at 410-388-5991.

Sincerely,

Russell Becker
Division Manager
Environmental Engineering and Affairs

Attachment

CC: EPA OPA Book
ISO 14000 CFT Members
Plant Maintenance Supervisors

Severstal Sparrows Point
1430 Sparrows Point Blvd.
Sparrows Point, MD 21219 USA

T: (410)388-6622
F: (410) 388-6529
E: russ.becker@severstalna.com



March 22, 2010

CERTIFIED RETURN RECEIPT REQUESTED

Mr. Greg Sonberg
Maryland Department of the Environment
Oil Control Program
1800 Washington Boulevard Suite 620
Baltimore, Maryland 21230-1708

Dear Mr. Sonberg:

This letter, and its attachment, will serve as the spill report for Severstal Sparrows Point, LLC for the Month of February, 2010. There was one spill during the month.

If there are questions please refer them to Joe Dolan, of my staff, at 410-388-5991.

Sincerely,

Russell Becker
Division Manager
Environmental Engineering and Affairs

Attachment

CC: EPA OPA Book
ISO 14000 CFT Members
Plant Maintenance Supervisors

Severstal Sparrows Point
1430 Sparrows Point Blvd.
Sparrows Point, MD 21219 USA

T: (410)388-6622
F: (410) 388-6529
E: russ.becker@severstalna.com

Mr. Greg Sonberg – March 22, 2010

Date and Time – 2/4/10 at approximately 1300 hours

Amount Spilled – Approximately 40 gallons

Spilled To – Ground

Material Spilled – Hydraulic oil (Castrol Blue)

Location – Plant Garage parking Lot

MDE Contacted – Jeff Molner On 2/4/10 at 1355 hours

On 2/4/10, at approximately 1300 hours a spill of approximately 40 gallons of hydraulic fluid was reported to Environmental. The report indicated that a hydraulic hose had burst on Kinder Morgan Caterpillar Dump Truck 706 which had been leased to Severstal.

Environmental personnel responded to the area and verified that a spill had occurred from the vehicle as was reported. The spill was contained on the ground and no sewers or waterways were involved. Kinder Morgan mechanics had been alerted and were on their way to scene to evaluate the vehicle.

Mobile Dredging was immediately summoned to the area to begin cleanup. They used a vacuumator and pressure washing equipment to remove the contaminated soil and to clean contaminated paving material. All contaminated material was delivered to Kroff Materials Processing for treatment.

After examining the truck, the Kinder Morgan mechanics determined that an o-ring on the hoist valve had failed. The valve was replaced and the truck was inspected and placed back into service. A check of the truck's history showed no similar failures. The truck receives regularly scheduled service at intervals of 250 hours.



April 14, 2010

CERTIFIED RETURN RECEIPT REQUESTED

Mr. Greg Sonberg
Maryland Department of the Environment
Oil Control Program
1800 Washington Boulevard Suite 620
Baltimore, Maryland 21230-1708

Dear Mr. Sonberg:

This letter, and its attachment, will serve as the spill report for Severstal Sparrows Point, LLC for the Month of March, 2010. There was one spill during the month.

If there are questions please refer them to Joe Dolan, of my staff, at 410-388-5991.

Sincerely,

Russell Becker
Division Manager
Environmental Engineering and Affairs

Attachment

CC: EPA OPA Book
ISO 14000 CFT Members
Plant Maintenance Supervisors

Severstal Sparrows Point
1430 Sparrows Point Blvd.
Sparrows Point, MD 21219 USA

T: (410)388-8622
F: (410) 388-8529
E: russ.becker@severstain.com

Mr. Greg Sonberg – April 14, 2010

Date and Time – 3/19/10 at approximately 0945 hours

Amount Spilled – Approximately 15 gallons

Spilled To – Ground

Material Spilled – Hydraulic fluid

Location – Near Truck Dock 48A

MDE Contacted – Bob Swan on 3/19/10 at 1218 hours

On 3/19/10, at approximately 0945 hours, a spill of approximately 15 gallons of hydraulic fluid was reported to Environmental. The report indicated that a hydraulic hose had burst on a coil hauler in the vicinity of Truck Dock 48A.

Environmental personnel responded to the area and verified that a spill had occurred from the vehicle as was reported. The spill was contained on the macadam roadway and the soil on the road shoulder. No sewers or waterways were involved. Plant Mobile Equipment personnel were on the scene and had contained the hydraulic fluid with speedi-dry.

The coil hauler was subsequently taken to the repair shop where the ruptured hydraulic hose was replaced and tested. All of the other hydraulic hoses were also inspected. Following that the unit was placed back into service

Contaminated speedi-dry and soil were taken to Kroff Materials processing for solidification and ultimate disposal.



May 24, 2010

CERTIFIED RETURN RECEIPT REQUESTED

Mr. Greg Sonberg
Maryland Department of the Environment
Oil Control Program
1800 Washington Boulevard Suite 620
Baltimore, Maryland 21230-1708

Dear Mr. Sonberg:

This letter, and its attachment, will serve as the spill report for Severstal Sparrows Point, LLC for the Month of April, 2010. There was one spill during the month. The spill occurred on April 6, 2010 and the original spill report was sent to you on April 14, 2010.

If there are questions please refer them to Joe Dolan, of my staff, at 410-388-5991

Sincerely,

Russell Becker
Division Manager
Environmental Engineering and Affairs

Attachment

CC: EPA OPA Book
ISO 14000 CFT Members
Plant Maintenance Supervisors

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1430 Sparrows Point Blvd.
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April 14, 2010

CERTIFIED RETURN RECEIPT REQUESTED

Mr. Greg Sonberg
Maryland Department of the Environment
Oil Control Program
1800 Washington Boulevard Suite 620
Baltimore, Maryland 21230-1708

Dear Mr. Sonberg:

This letter, and its attachment, will serve as the report for the No. 6 Fuel Oil spill that occurred at L Furnace on April 6, 2010.

If there are questions please refer them to Joe Dolan, of my staff, at 410-388-5991.

Sincerely,

Russell Becker
Division Manager
Environmental Engineering and Affairs

Attachment

CC: EPA OPA Book
ISO 14000 CFT Members
Plant Maintenance Supervisors

Severstal Sparrows Point
1430 Sparrows Point Blvd.
Sparrows Point, MD 21219 USA

T: (410) 388-6622
F: (410) 388-6529
E: russ.becker@severstain.com

Mr. Greg Sonberg – April 14, 2010

Date and Time – 4/6/10 at approximately 1240 hours

Amount Spilled – Approximately 60 gallons

Spilled To – Ground

Material Spilled – No. 6 Fuel Oil

Location – Beneath L Furnace near the cooling tower

MDE Contacted – Mike Imbierowicz on 4/6/10 at 1350 hours

On 4/6/10, at approximately 1240 hours, a spill of approximately 60 gallons of No. 6 Fuel Oil was reported to Environmental. The report indicated that a transfer line had ruptured in the vicinity of the L Blast Furnace Cooling Tower.

Environmental personnel responded to the area and verified that a spill had occurred from the transfer line as was reported. The spill was contained on the ground beneath the transfer line and no sewers or waterways were involved. Furnace utility personnel were on the scene constructing containment dikes and arranging for repair personnel to come to the site. Mobile Dredging and Pumping was called to the site to begin cleanup.

When millwrights arrived they stripped the insulation from the area of the leak and found a small hole of about one half inch in diameter. They then inserted a dowel in the hole and effectively stopped the leak. Power and Utilities millwrights arrived a few minutes later and installed an Adams clamp over the hole.

Mobile Dredging arrived at approximately 1335 hours and began cleanup. Using a vector and pressure washer they finished the cleanup later that evening. All recovered liquid and contaminated soil was taken to Kroff Materials Processing for recycling and disposal.

On April 9, 2010 Mobile Dredging returned to the area and, with the assistance of the Blast Furnace Utilities personnel, drained the remaining liquid out of the line and took it to Kroff Materials Processing for recycling.

The No. 6 Fuel Oil line was used to inject fuel oil into the blast furnace. However, that system has not been used in a number of years and the line was mothballed. A check of the plant fuel oil system showed pumps that supply No. 6 Oil to L Furnace to be off and isolation valves closed and tight. It is believed that the oil that leaked was residual oil that remained in the system after it was shut down after its last use. Corrosion of the transfer line was the cause of the spill.

We are in the process of determining if L Furnace will need to use No. 6 Oil in the future. If it does not we will solicit bids for cleaning and demolition of the system.



June 23, 2010

CERTIFIED RETURN RECEIPT REQUESTED

Mr. Greg Sonberg
Maryland Department of the Environment
Oil Control Program
1800 Washington Boulevard Suite 620
Baltimore, Maryland 21230-1708

Dear Mr. Sonberg:

This letter will serve as the spill report for Severstal Sparrows Point, LLC for the Month of May, 2010. There were no spills during the month.

If there are questions please refer them to Joe Dolan, of my staff, at 410-388-5991.

Sincerely,

A handwritten signature in black ink that reads "Russell Becker".

Russell Becker
Division Manager
Environmental Engineering and Affairs

CC: EPA OPA Book
ISO 14000 CFT Members
Plant Maintenance Supervisors

Severstal Sparrows Point
1430 Sparrows Point Blvd.
Sparrows Point, MD 21219 USA

T: (410)388-6622
F: (410) 388-6629
E: russ.becker@severstalna.com



July 23, 2010

CERTIFIED RETURN RECEIPT REQUESTED

Mr. Greg Sonberg
Maryland Department of the Environment
Oil Control Program
1800 Washington Boulevard Suite 620
Baltimore, Maryland 21230-1708

Dear Mr. Sonberg:

This letter will serve as the spill report for Severstal Sparrows Point, LLC for the Month of June, 2010. There were no spills during the month.

If there are questions please refer them to Joe Dolan, of my staff, at 410-388-5991.

Sincerely,

Russell Becker
Division Manager
Environmental Engineering and Affairs

CC: EPA OPA Book
ISO 14000 CFT Members
Plant Maintenance Supervisors

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1430 Sparrows Point Blvd.
Sparrows Point, MD 21219 USA

T: (410)388-6622
F: (410) 388-6529
E: russ.becker@severstalna.com



August 10, 2010

CERTIFIED RETURN RECEIPT REQUESTED

Mr. Greg Sonberg
Maryland Department of the Environment
Oil Control Program
1800 Washington Boulevard Suite 620
Baltimore, Maryland 21230-1708

Dear Mr. Sonberg:

This letter will serve as the spill report for Severstal Sparrows Point, LLC for the Month of July, 2010. There were no spills during the month.

If there are questions please refer them to Joe Dolan, of my staff, at 410-388-5991.

Sincerely,

Russell Becker
Division Manager
Environmental Engineering and Affairs

CC: EPA OPA Book
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1430 Sparrows Point Blvd.
Sparrows Point, MD 21219 USA

T: (410)388-6622
F: (410) 388-6529
E: russ.becker@severstalna.com



September 22, 2010

CERTIFIED RETURN RECEIPT REQUESTED

Mr. Greg Sonberg
Maryland Department of the Environment
Oil Control Program
1800 Washington Boulevard Suite 620
Baltimore, Maryland 21230-1708

Dear Mr. Sonberg:

This letter will serve as the spill report for Severstal Sparrows Point, LLC for the Month of August, 2010. There were no spills during the month.

If there are questions please refer them to Joe Dolan, of my staff, at 410-388-5991.

Sincerely,

Russell Becker
Division Manager
Environmental Engineering and Affairs

CC: EPA OPA Book
ISO 14000 CFT Members
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1430 Sparrows Point Blvd.
Sparrows Point, MD 21219 USA

T: (410)388-6622
F: (410) 388-6629
E: russ.becker@severstalna.com



October 6, 2010

CERTIFIED RETURN RECEIPT REQUESTED

Mr. Greg Sonberg
Maryland Department of the Environment
Oil Control Program
1800 Washington Boulevard Suite 620
Baltimore, Maryland 21230-1708

Dear Mr. Sonberg:

This letter will serve as the spill report for Severstal Sparrows Point, LLC for the Month of September, 2010. There were no spills during the month.

If there are questions please refer them to Joe Dolan, of my staff, at 410-388-5991

Sincerely,

Russell Becker
Division Manager
Environmental Engineering and Affairs

CC: EPA OPA Book
ISO 14000 CFT Members
Plant Maintenance Supervisors

Severstal Sparrows Point
1430 Sparrows Point Blvd.
Sparrows Point, MD 21219 USA

T: (410)388-6622
F: (410) 388-6529
E: russ.becker@severstalna.com



November 22, 2010

CERTIFIED RETURN RECEIPT REQUESTED

Mr. Greg Sonberg
Maryland Department of the Environment
Oil Control Program
1800 Washington Boulevard Suite 620
Baltimore, Maryland 21230-1708

Dear Mr. Sonberg:

This letter will serve as the spill report for Severstal Sparrows Point, LLC for the Month of October, 2010. There were no spills during the month.

If there are questions please refer them to Joe Dolan, of my staff, at 410-388-5991.

Sincerely,

Russell Becker
Division Manager
Environmental Engineering and Affairs

CC: EPA OPA Book
ISO 14000 CFT Members
Plant Maintenance Supervisors

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1430 Sparrows Point Blvd.
Sparrows Point, MD 21219 USA

T: (410)388-6622
F: (410) 388-6529
E: russ.becker@severstalna.com



December 13, 2010

CERTIFIED RETURN RECEIPT REQUESTED

Mr. Greg Sonberg
Maryland Department of the Environment
Oil Control Program
1800 Washington Boulevard Suite 620
Baltimore, Maryland 21230-1708

Dear Mr. Sonberg:

This letter will serve as the spill report for Severstal Sparrows Point, LLC for the Month of November, 2010. There were no spills during the month.

If there are questions please refer them to Joe Dolan, of my staff, at 410-388-5991.

Sincerely,

Russell Becker
Division Manager
Environmental Engineering and Affairs

CC: EPA OPA Book
ISO 14000 CFT Members
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1430 Sparrows Point Blvd.
Sparrows Point, MD 21219 USA

T: (410)388-6622
F: (410) 388-6529
E: russ.becker@severstalna.com



January 10, 2010

CERTIFIED RETURN RECEIPT REQUESTED

Mr. Greg Sonberg
Maryland Department of the Environment
Oil Control Program
1800 Washington Boulevard Suite 620
Baltimore, Maryland 21230-1708

Dear Mr. Sonberg:

This letter will serve as the spill report for Severstal Sparrows Point, LLC for the Month of December, 2010. There were no spills during the month.

If there are questions please refer them to Joe Dolan, of my staff, at 410-388-5991.

Sincerely,

Russell Becker
Division Manager
Environmental Engineering and Affairs

CC: EPA OPA Book
ISO 14000 CFT Members
Plant Maintenance Supervisors

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