

February 15, 2012

Mr. Andrew Fan
US EPA Region III, 3WC23
1650 Arch Street
Philadelphia, PA 19103-2029

Ms. Barbara Brown
Project Coordinator
Maryland Department of the Environment
1800 Washington Blvd
Baltimore, Maryland 21230

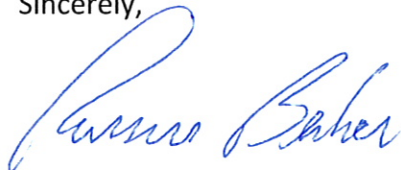
**Subject: Consent Decree, Civil Action JFM-97-558
Multimedia Consent Decree 2011 Annual Report**

Dear Mr. Fan and Ms. Brown;

Enclosed please find the 2011 Annual Report for the referenced Multimedia Consent Decree. This report is submitted in compliance with the annual reporting requirements of the Decree.

If you have any questions, please contact me at (410) 388-6622.

Sincerely,



Russell Becker
Division Manager
Environmental Engineering and Affairs

Enclosures



Multimedia Consent Decree

2011 Annual Report

Prepared for:

U S Environmental Protection Agency

Maryland Department of the Environment

Prepared by:

**RG Steel Sparrows Point , LLC
1430 Sparrows Point Boulevard
Baltimore, MD 21219**

February 2012

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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 2011 that was accomplished by RG Steel Sparrows Point, LLC (RG Steel, formerly Severstal Sparrows Point, LLC).

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 2011 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 RG Steel to implement the Decree.

2.0 Waste Minimization Plan

A summary of waste minimization activities completed during 2011 is presented in the following sections. To satisfy Decree Section XVIII on pollution prevention expenditures, each section also lists the costs incurred in 2011.

Sump/Tank Work Plan

Description of 2011 Activity:

Sumps and tanks underwent routine periodic inspections as necessary in 2011. 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

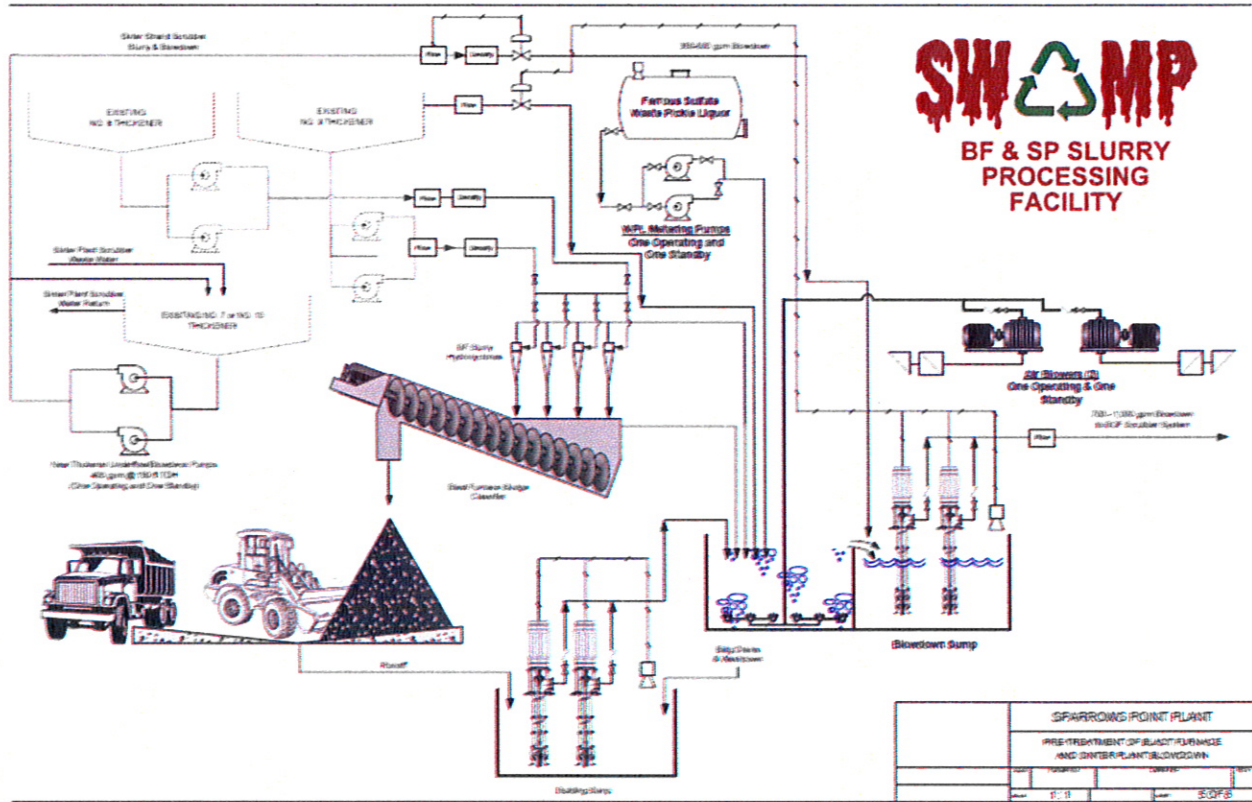
2011 Expenditures: Maintenance completed by in-house personnel

Recycle of Blast Furnace Gas Cleaning Slurry Solids

Description of 2011 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.

A conceptual design for the recycle of blast furnace gas cleaning slurry solids/filter cake was completed in 2011. The design is shown below:



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

- Evaluate cost and feasibility of hydrocyclone facility. Perform pilot scale testing of hydrocyclone units to confirm acceptable operational parameters for current L Blast Furnace gas cleaning system characteristics. (2nd qtr 2012)
- Select preferred hydrocyclone option. Develop capital appropriation request and schedule for selected option (3rd qtr 2012)
- Install hydrocyclone facility - Implementation/Construction of Project – Anticipated to start 2013

2011 Expenditures: Engineering completed by in-house personnel

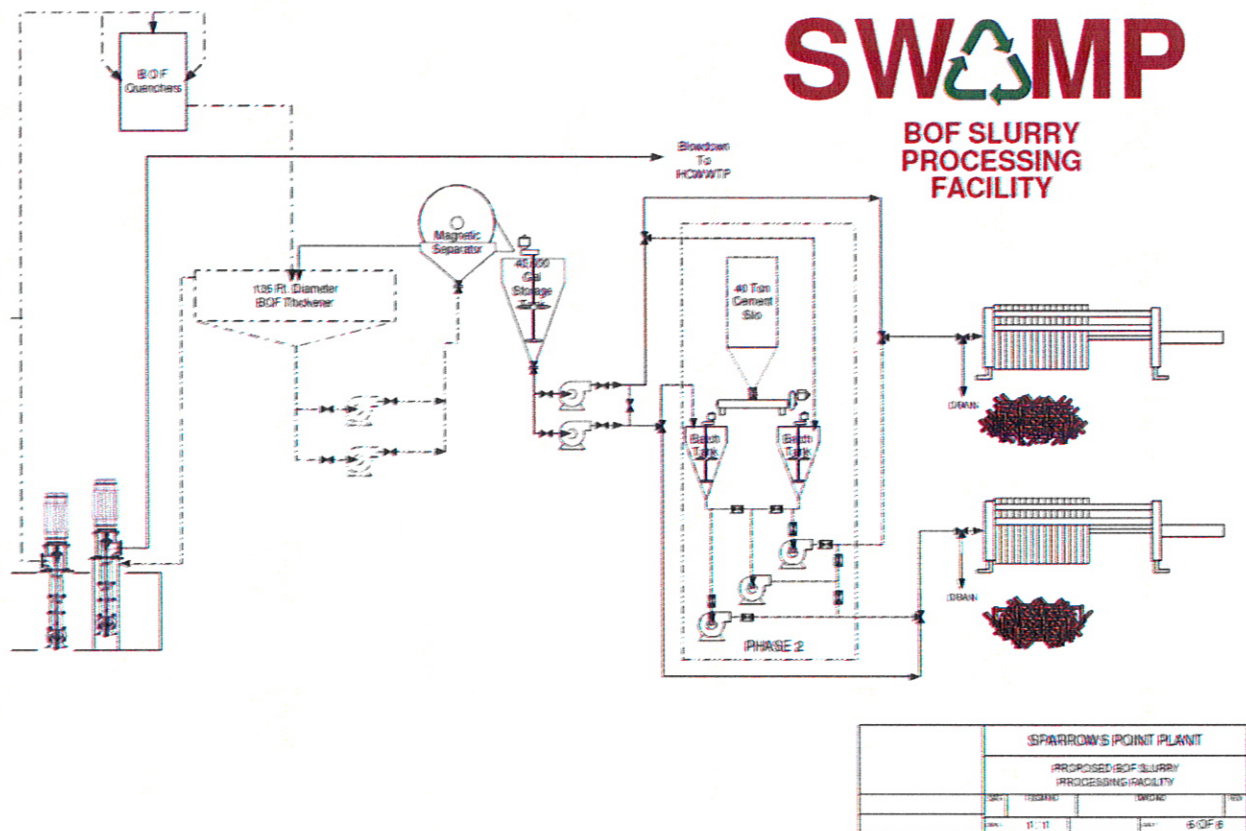
Recycling of BOF Fume Sludge

Description of 2011 Activity:

A pilot scale recycling facility was set up in 2011 and a test program is underway to finalize the design requirements to generate a replacement BOF coolant product from recycled BOF fume sludge. The pilot facility includes feeding, mixing and extrusion equipment to produce an extrusion pellet of recycled BOF fume.

The use of various binders and required mixture percentages to provide the necessary strength characteristics are currently being evaluated. It is anticipated that final design requirements will be defined in 2012 that will support construction and implementation of a recycling facility capable of producing 50 to 100 tons per day of replacement BOF coolant product.

A conceptual design for the recycle of BOF fume sludge was completed in 2011. The design is shown below:



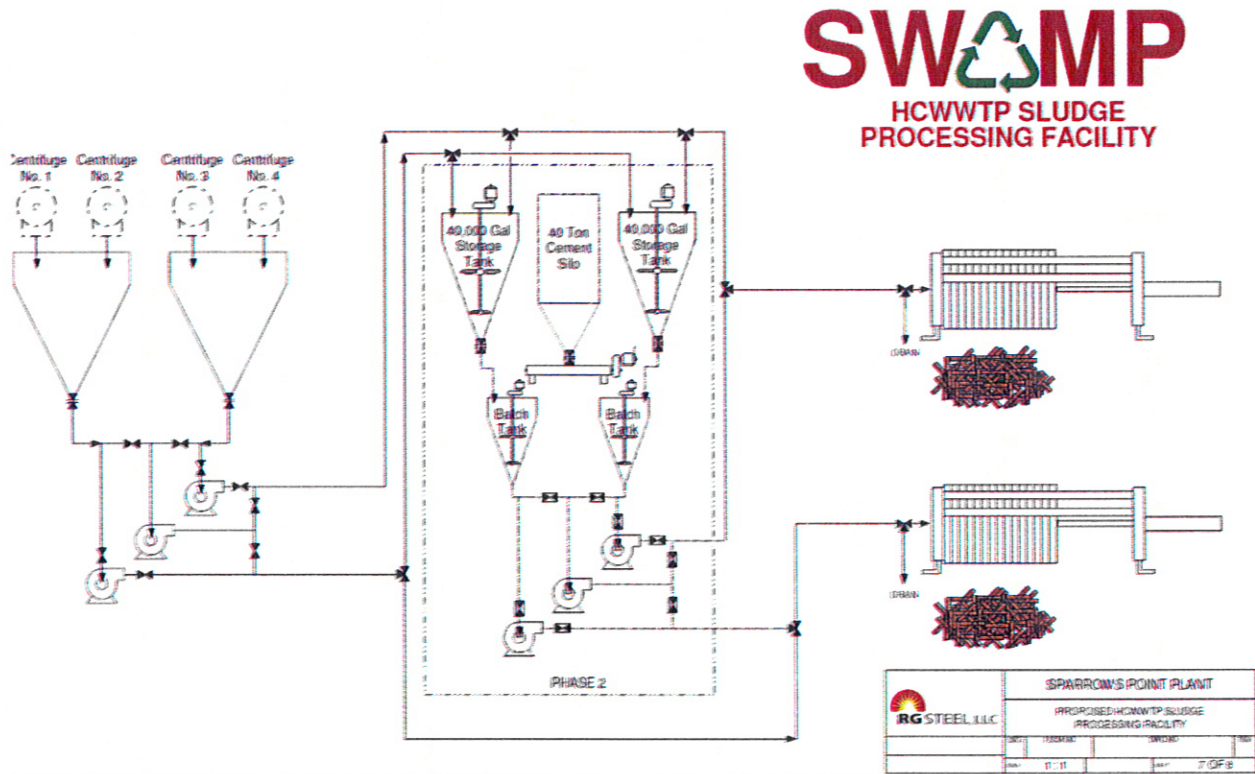
2011 Expenditures: Engineering completed by in-house personnel, pilot study work being conducted on-site by contracted services- \$250,000

Recycling of Humphreys Creek Wastewater Treatment Plant Sludge

Description of 2011 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. A conceptual design for the recycle of Humphreys Creel Wastewater Treatment Plant sludge was completed in 2011. The design is shown below:



This study effort will be continued in 2012 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.

2011 Expenditures: Engineering completed by in-house personnel

Maintenance Dredging of the Tin Mill Canal

Description of 2011 Activity:

No maintenance dredging activities were conducted in 2011.

2011 Expenditures: \$0

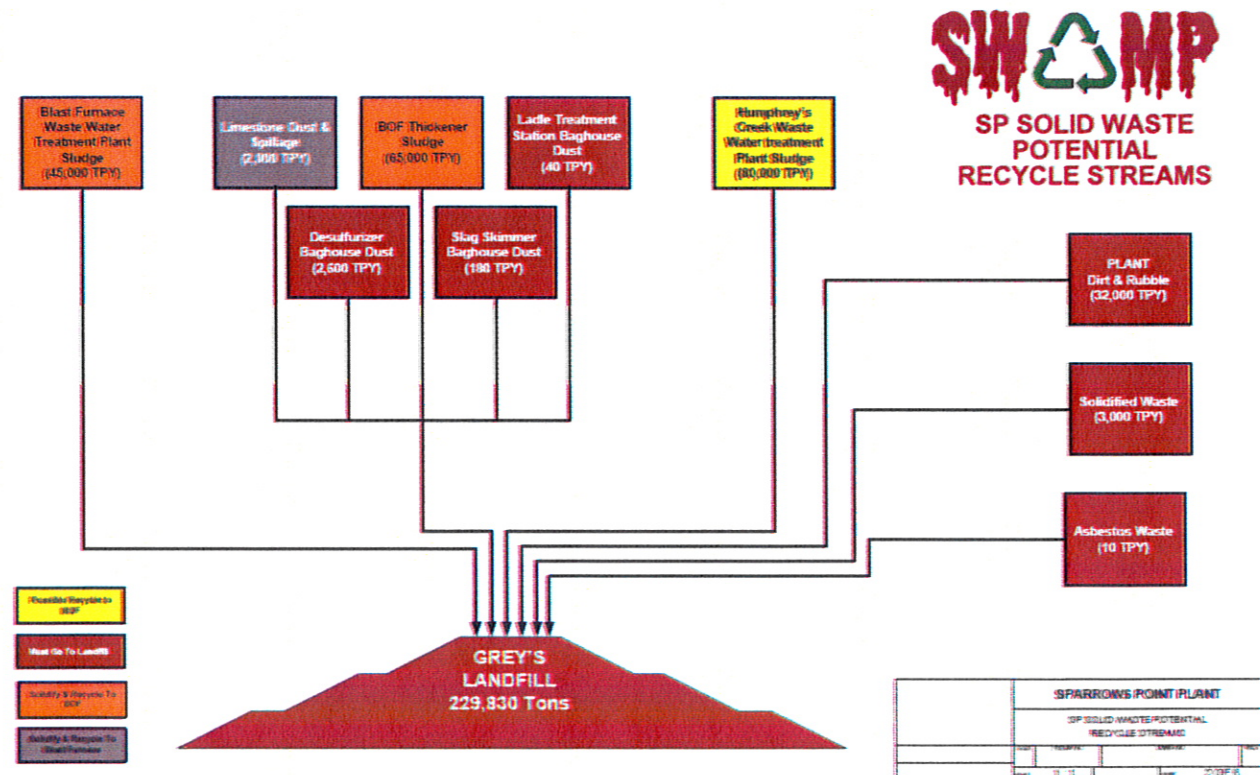
Facility Wide Waste Minimization Plan

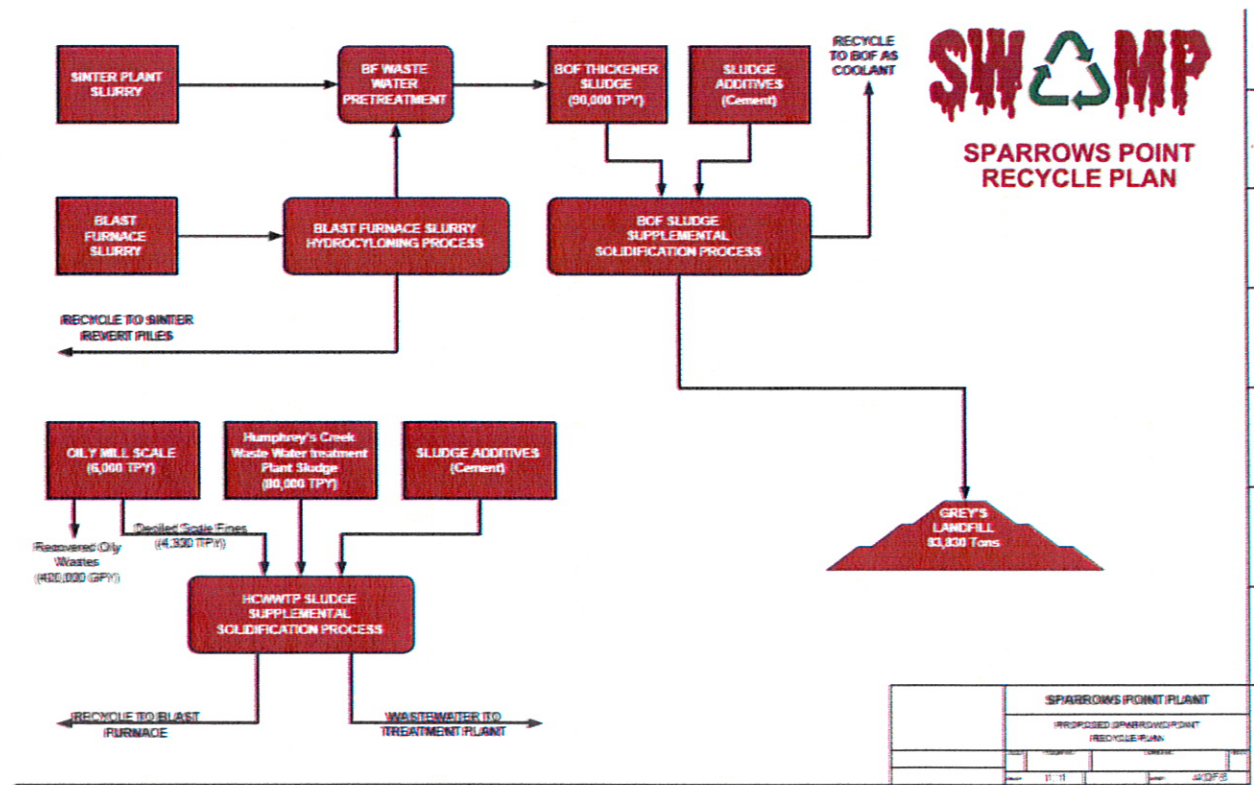
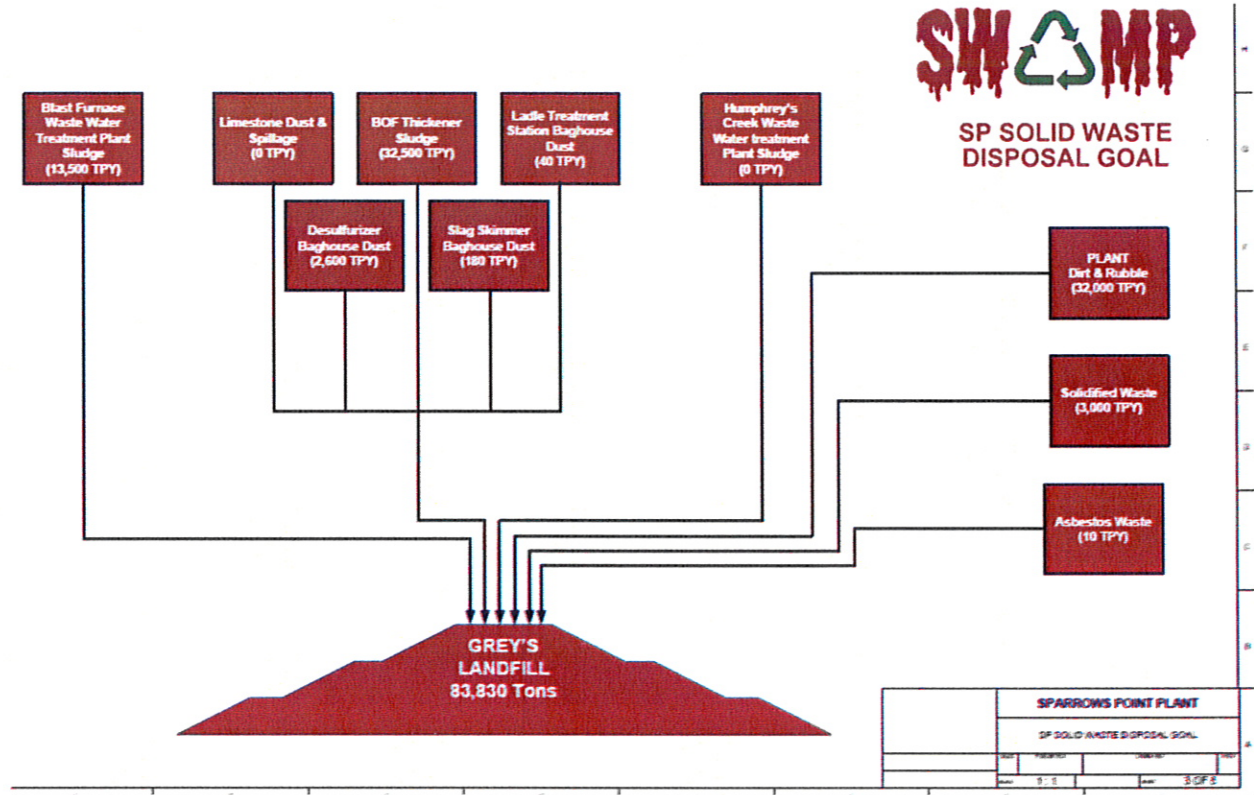
A Facility-wide Waste Minimization Plan (October 2006 Plan Update) was submitted in November 2006 in accordance with requirements of the Decree outlined in Section VI, Paragraph 3.c.

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

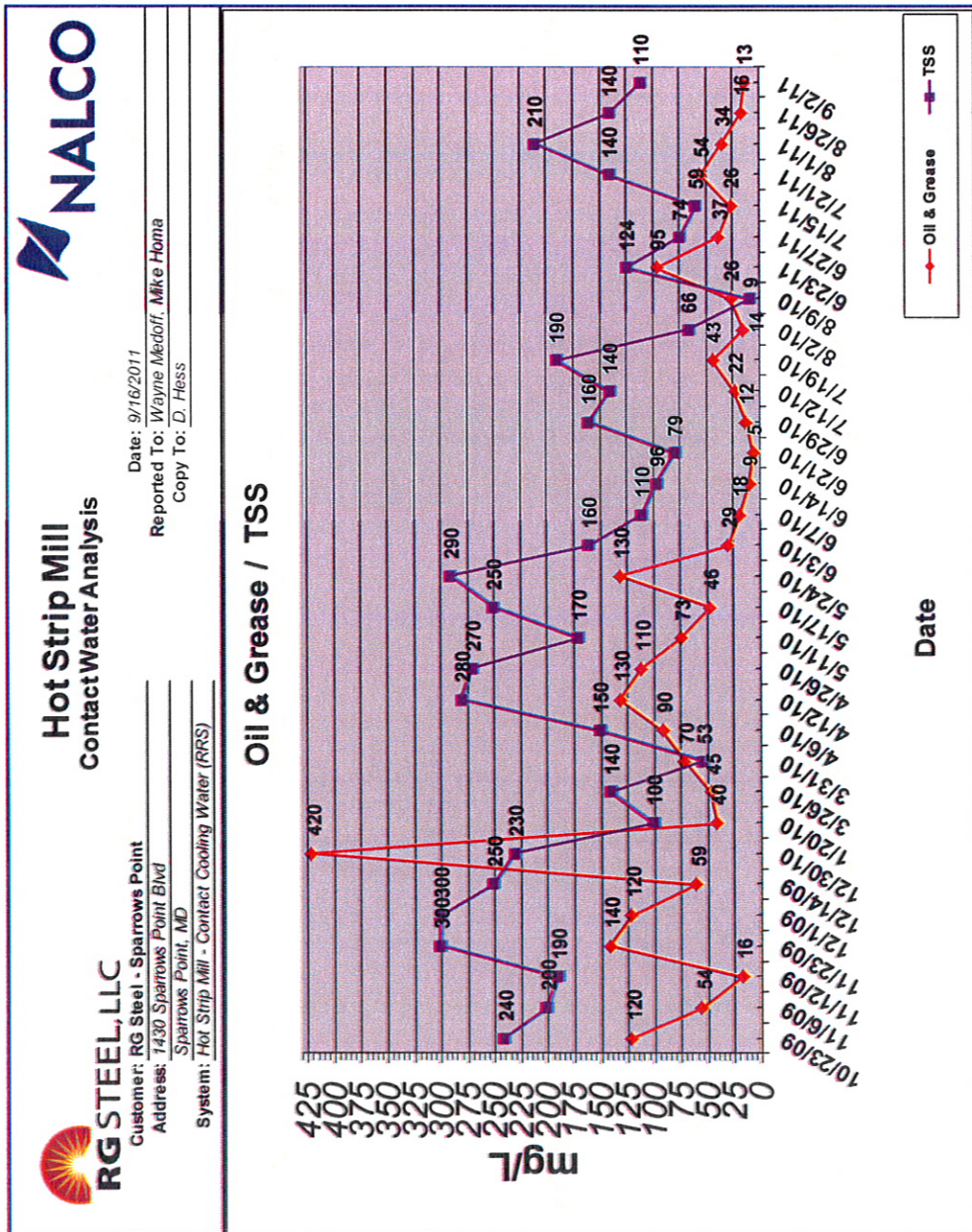
The following schematics illustrate the program that is being developed to recycle and reuse reverts and emission control sludges generated at the facility and minimize emission control sludge disposal requirements. Pilot and field testing of possible recycle options are either underway or will be scheduled with capital projects for the facility.





Reduce lubricating oil use at Hot Mill and Increase Recycling Percentage of Hot Strip Mill Scale

Waste minimization efforts at the Hot Strip Mill were completed in 2011 to reduce oil use and subsequent concentrations of oil and grease and suspended solids in wastewater discharges that require on-site treatment. The following graph presents oil and grease and total suspended solids data for wastewater discharges from the Hot Strip Mill during 2011. Substantial reductions are shown in 2011 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.



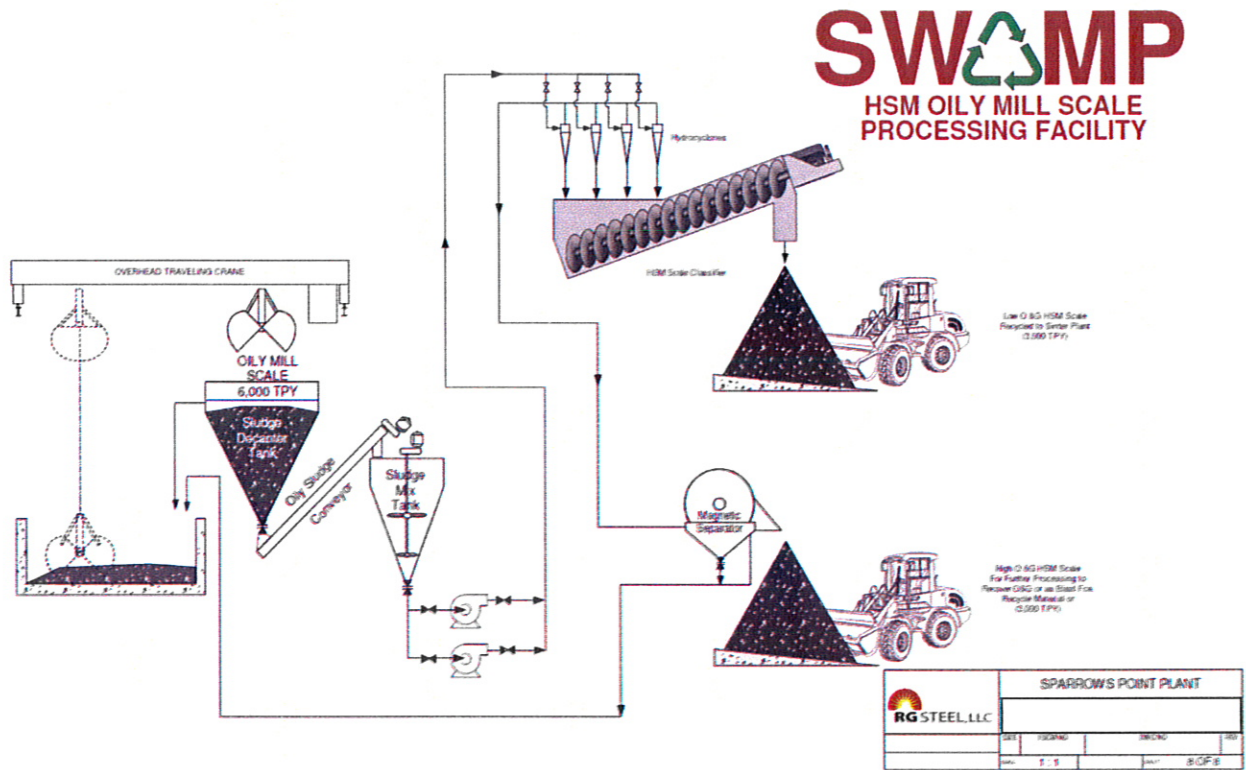
NALCO

Hot Strip Mill
Contact Water Analysis

Date: 9/16/2011
Reported To: Wayne Medoff, Mike Homa
Copy To: D. Hess

RG STEEL, LLC
Customer: RG Steel - Sparrows Point
Address: 1430 Sparrows Point Blvd
Sparrows Point, MD
System: Hot Strip Mill - Contact Cooling Water (RRS)

Several laboratory test projects were also completed in 2011 to evaluate the potential for recycling of hot strip mill scale materials at the Sinter Plant. Conceptual designs are shown below; this work will continue in 2012.



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 2011, RG Steel, 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 2011 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 3,471,639 gallons of water were extracted from the two Former Sludge Bin Storage Area groundwater pumping wells (RW15-PZM020 and RW10-PZM020) during 2011. This compares to 5,135,229 gallons extracted in 2010. The average total pumping rate for 2011 was 9,511 gallons per day (gpd), or 6.6 gallons per minute (gpm). A total of 179 pounds (lbs) of cadmium and 8,418 lbs of zinc were removed and treated during 2011. This compares to 211 lbs of cadmium and 11,835 lbs of zinc removed in 2010. The decrease in mass removal of cadmium and zinc in 2011 compared to 2010 is due to a reduction in the volume of extracted groundwater, and, for zinc, also due to a reduction in the zinc concentration.

Intermediate zone (approximately 20 to 30 feet below the ground surface) groundwater pumping, at the average annual 2011 pumping rate of 2.8 gallons per minute (gpm) for recovery well RW15-PZM020 and

3.8 gpm for recovery well RW10-PZM020, results in a radius of intermediate zone pumping influence that effectively controls movement the intermediate zone plume. 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 2011 suggests some improvement in groundwater quality as compared to 2010.

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 2011 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. In 2011, cadmium concentrations have returned to levels similar to previous concentrations in RW06-PZM001 (2.3 mg/l and 1.7 mg/l in the 2nd and 4th quarters, respectively).

Zinc—Zinc concentrations in the two pumping wells (RW10-PZM020 and RW15-PZM020) are generally similar to concentrations observed in recent prior years. Exceptions include the 2011 4th quarter zinc concentrations for RW10-PZM004 (460 mg/l), RW20-PZM020 (100 mg/l), and RW10-PZM065 (460 mg/l). Each of these concentrations was unreasonably higher than historically has been 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 and as modified in this report.

Site Wide Investigation

Work completed for the Site Wide Investigation during 2011 included the following activities:

Ecological Risk Assessment Program

Milestones achieved for the Ecological risk Assessment Program in 2011 included completion of the on-site ecological risk assessment requirements outlined in the Consent Decree. The following documents were submitted to the agencies in 2011:

Final Baseline Ecological Risk Assessment for On-Site Areas (BERA) Report (URS, October 7, 2011) **Response to US EPA Comments dated August 10, 2011 and Final Report Submittal**

The *Final Baseline Ecological Risk Assessment for On-Site Areas (BERA) Report* was conducted for the RG Steel Sparrows Point, LLC facility in accordance with the requirements of the referenced Consent Decree. The BERA characterizes risks for valued wildlife receptors from exposure to on-site surface soil, sediment and/or surface water and will support future decisions regarding the need for and potential extent of on-site corrective measures. Specifically, the BERA focused on potential ecological risks associated with the on-site areas of concern identified in the *Ecological Risk Assessment Work Plan for On-Site Areas* approved by USEPA (URS 2007).

The final report incorporated revisions to the draft BERA report submitted in August 2010 (URS) in accordance with a US EPA request dated August 10, 2011. The final report also incorporated responses to the comments received from the agencies in a separate document to fully address on-site ecological assessment requirements of the referenced Consent Decree.

This tier of the ecological risk assessment process followed 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.

Off-Shore Site Wide Investigation

RG Steel Sparrows (formerly Severstal Sparrows Point, LLC) petitioned the US District Court on August 3, 2010, for resolution of a dispute arising under the 1997 Consent Decree related to the off-shore portion of the site wide investigation requirement of the Decree. This petition arose from unsuccessful dispute resolution with the agencies in conjunction with two work plan submittals and subsequent disapprovals in 2009 and 2010. 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.

The Court held two hearings related to the dispute and issued its Opinion and Order on July 5, 2011 which resolved the issues presented in the Petition. The July 5 Order directed the parties to “confer with one another and report back to me . . . as to whether they have been able to reach agreement as to the scope of the site wide investigation to be conducted at Severstal’s expense.” RG Steel Sparrows and the

agencies diligently complied with that Order and submitted a status report to the Court on December 15, 2011. The status report indicated that the parties had reached an agreement on a framework for performance of the off-shore portion of the site wide investigation (SWI Agreement).

The agreement by and between RG Sparrows, EPA, and MDE was submitted to the Court on December 28, 2011 through a stipulation and order entering the agreement for off-shore site wide investigation memorialized in a document titled *Framework for RG Steel Sparrows Point LLC Offshore Ecological and Human Health Investigation Portion of the Site Wide Investigation*. A workplan including a schedule for completion of the SWI Agreement will be developed in accordance with the outlined terms of the order upon approval by the Court. The Court will retain jurisdiction over submittal and approval of the workplan, until the workplan submitted pursuant to the SWI Agreement is approved by EPA and MDE.

Coke Oven Area Interim Measures

Interim measures (IMs) have been developed to address identified environmental conditions at the Coke Oven Area (COA) Special Study Area in accordance with the United States Environmental Protection Agency's (US EPA)'s September 2, 2010 letter. Six IM "Cells" are planned to be constructed 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,
- 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.

As of December 31, 2011, Cells 1, 3, 4 and 6 are operational. The remaining Cells (Cells 2 and 5) are in various stages of evaluation, design, and under permitting considerations by Maryland Department of the Environment (MDE).

Cell 1: Prototype AS/SVE System in the Former Benzol Processing Area

Cell 1 consists of a prototype IM, which includes AS/SVE coupled with vapor destruction via an electric catalytic oxidation (CATOX) unit. Modifications and equipment improvements were completed in 2011 for the Cell 1 prototype system to support continued longer-term operation of the AS/SVE interim measure remedial action in this area. In total, Cell 1 has destroyed approximately 9,103 pounds of recovered hydrocarbons since the startup of the IM system in 2010. Since system startup in August 2010, a decreasing total VOC concentration trend has been documented in the groundwater at well CO18-PZM006 while a generally decreasing trend is observed at wells BP-MW-09 and C002-PZM006. The identified trend for these monitoring wells will continue to be monitored and assessed during system operation in future months.

Cell 3: AS/SVE System in the “Cove” Area

Cell 3 consists of an AS/SVE system coupled with vapor destruction via an electric CATOX unit. The major design components were described in the Cell 3 final design report (*Coke Oven Area Interim Measures Cell 3 “Cove” Area Air Sparge/Soil Vapor Extraction System Design*), submitted to US EPA on March 1, 2011. In total, Cell 3 has destroyed approximately 440.9 pounds of recovered hydrocarbons since system startup on June 24, 2011. Groundwater trends for four monitoring wells were monitored and assessed during system operation.

Cell 4: In-Situ Anaerobic Bio-treatment Area

Cell 4 consists of an in-situ anaerobic bio-treatment system including extraction and mixing of groundwater in an above ground storage tank containing a nutrient amendment solution and reinjection of groundwater. The major design components were described in the Cell 4 final design report (*Coke Oven Area Interim Measures Cell 4 In-Situ Anaerobic Bio-Treatment System Design*), submitted to US EPA on March 31, 2011. Three amendment dosing events occurred in 2011 on a bi-monthly basis in conjunction with system monitoring events to document the potential impacts. Trends for ten monitoring wells were monitored and assessed during system operation.

Cell 6: LNAPL Extraction at the Former Benzol Processing Area

The Cell 6 LNAPL monitoring and recovery system was monitored approximately weekly during 2011. During December 2011, approximately 216 gallons (1,581 pounds) of LNAPL was recovered, bringing the total recovered LNAPL to 6,723 gallons (49,259 pounds) as of December 28, 2011. The LNAPL was recovered from the following wells:

Well	LNAPL Recovery (gal / lbs)		Notes
	During December 2011	Total thru Dec. 28, 2011	
BP-MW-05	80.8 / 592	5,499 / 40,294	
RW-04	113.2 / 829	908 / 6,652	
BP-MW-08	21.9 / 160	302 / 2,211	
BP-MW-11	0 / 0	7.8 / 57	(a)
RW-03	0 / 0	4.0 / 29	(b)
RW-01	0 / 0	1.3 / 10	(b)
RW-02	0 / 0	0.8 / 5.5	(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 2011, the thicknesses are as summarized below (wells are not listed if LNAPL was not present):

- RW-04 (0.13 to 1.60 feet),
- BP-MW-05 (0.15 to 0.79 feet),
- BP-MW-08 (0.15 to 2.09 feet),
- BP-MW-11 (0.40 to 0.58 feet)
- BP-MW-10 (0.15 to 0.13 feet),
- RW-02 (0.11 to 0.15 feet),

- RW-03 (0.12 to 0.23 feet),
- RW-01 (0.11 to 0.14 feet), and
- BP-MW-07 (0.00 to 0.02 feet).

No LNAPL was observed in wells RW-05, BP-MW-06, BP-MW-09, or CO19-PZM004.

The existing LNAPL recovery systems will be operated in 2012 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 2011 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 2011. 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 2011 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. 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 summarized groundwater monitoring results for the 1st half of 2010 and provided 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.

A groundwater sampling and analysis plan was developed for Greys Landfill for 2011 and submitted to MDE on December 15, 2010 for approval. MDE approved the plan on March 9th, 2011.

Groundwater monitoring results were submitted in June 2011 (*Greys Landfill Groundwater Monitoring Report for the 1st half of 2011*, KCI 2011). This monitoring report summarizes groundwater-monitoring results at Greys Landfill during the first half of 2011 (and also presents results collected for the initial four-quarter monitoring event that occurred from July 2009 to June 2010) and fulfilled the applicable environmental monitoring requirements for Greys Landfill outlined in the approved Coke Point and Greys Landfills 2011 Groundwater Sampling and Analysis Plan.

The following data collection activities occurred during 2011:

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

Results of the above investigations were presented in the report including:

- 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;
- Includes a groundwater contour map for the shallow zone; and
- Includes other tables and figures developed to present the monitoring information.

The report provides recommendations for continued monitoring at Greys Landfill that are consistent with normal practices of the Department for landfill groundwater compliance monitoring programs.

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, RG Steel 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.

Design work is currently underway for erosion and sediment control, slope stabilization and waste covering requirements. A revised erosion and sediment control plan and associated report were submitted to Baltimore County Soil Conservation District (BCSCD) for approval in October 2011. Comments were received from BCSCD in November 2011. Work is underway to address the comments.

Groundwater Monitoring Program

A groundwater sampling and analysis plan was developed for Coke Point Landfill for 2011 and submitted to MDE on December 15, 2010 for approval. MDE approved the plan on March 9th, 2011.

Groundwater monitoring results were submitted in December 2011 (*Coke Point Landfill Groundwater Monitoring Report 2nd and 3rd Quarters 2011*, KCI 2011). This monitoring report summarized groundwater-monitoring results at Greys Landfill during the 2nd and 3rd quarters of 2011 and fulfilled the applicable environmental monitoring requirements for Coke Point Landfill outlined in the approved Coke Point and Greys Landfills 2011 Groundwater Sampling and Analysis Plan.

The following data collection activities occurred during 2011:

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

Results of the above investigations were presented in the report including:

- 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;
- Includes a groundwater contour map for the shallow zone; and
- Includes other tables and figures developed to present the monitoring information.

The report provides recommendations for continued monitoring at Coke Point Landfill that are consistent with normal practices of the Department for landfill groundwater compliance monitoring programs.

5.0 Decree Management Reporting

Project Management

The US EPA and MDE were informed of a name change for the facility from Severstal Sparrows Point, LLC to RG Steel Sparrows Point, LLC on April 21, 2011. Notification to the U. S. Environmental Protection Agency and the Maryland Department of the Environment was also provided on April 21, 2011 that the Project Coordinator responsible for the referenced Consent Decree for RG Steel Sparrows Point, LLC is:

Mr. Russell Becker, Division Manager, Environmental Engineering and Affairs
RG Steel Sparrows Point, LLC
1430 Sparrows Point Blvd.
Sparrows Point, Maryland 21219
Phone: (410) 388-6622
Fax: (410) 388-6529

e-mail: russ.becker@rg-steel.com

Communications between or among the parties, and documents, reports, approvals and other correspondence concerning the activities performed pursuant to the terms and conditions of the Consent Decree shall be directed to Mr. Becker. Copies of all documents to be submitted to RG Steel Sparrows Point, LLC shall be sent to the Project Coordinator.

URS Corporation and Integral Consulting Inc. have been selected as subcontractors to support activities associated with Section V of the Consent Decree.

Community Relations

There were several community relation activities during the year in support of communication efforts and the community outreach plan 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.

Community Leader Meetings

A community leader meeting was held in January 2011 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 RG Steel 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 2012.

Release Reporting

Appendix A contains spill reports for the facility that were reported in 2011. 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 4, 2011

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 January, 2011. 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, appearing to read "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) 388-6529
E: russ.becker@severstalna.com



March 14, 2011

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 February, 2011. 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, appearing to read "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) 388-6529
E: russ.becker@severstalna.com



1430 Sparrows Point Boulevard • Sparrows Point, MD 21219

April 25, 2011

CERTIFIED RETURN RECEIPT REQUESTED

Mr. Greg Sonberg
Maryland Department of the Environment
Oil Control Division
1800 Washington Boulevard Suite 620
Baltimore, Maryland 21030-1708

Dear Mr. Sonberg:

This letter, and its attachment, will serve as the spill report for Severstal Sparrows Point, LLC for the month of March, 2011. 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

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

Russell Becker
Division Manager, Environmental Engineering and Affairs
E-mail Address: Russ.Becker@rg-steel.com

Phone: 410-388-6622
Fax: 410-388-6529
www.rg-steel.com

Mr. Greg Sonberg – April 25, 2011

Date and Time – 3/28/11 at approximately 1327 hours

Amount Spilled – Approximately 5 to 10 gallons

Spilled To – Ground

Material Spilled – Paradene 46AW Hydraulic Oil

Location – Just east of No. 10 Locker Room

MDE Contacted – Jeff Donahue at 1400 hours on 3/28/11

On 3/28/11 at approximately 1327 hours, a spill of approximately five to ten gallons of Paradene 46AW hydraulic oil was reported to Environmental Engineering and Affairs. The report indicated that a hydraulic hose had burst on Electrical Construction Bucket Truck 6216. The truck was immediately removed from service and a bucket was placed beneath the ruptured hose to catch the leaking oil and absorbent pads were placed atop the spilled oil in an effort to contain and trap it.

Environmental personnel responded to the area, at approximately 1345 hours, and verified that a spill had occurred from the bucket truck as was reported and observed Mobile Equipment mechanics examining the truck. The spill was contained on the ground beneath the truck and no sewers or waterways were involved. Mobile Dredging and Pumping was called to the site to begin the cleanup operation.

When Mobile Dredging arrived, at about 1420 hours, they drained the hydraulic reservoir on the truck and the leak ceased. Following that they vacuumed up the contaminated soil beneath the vehicle as best as they could. The job could not be finished because they could not reach all of the areas beneath the truck. The job had to wait until the mechanics were able to raise the truck outriggers and move the truck from its location and transport it to the repair facility. An empty bucket was left under the hose to capture any residual that may have leaked out.

The following day Mobile Dredging returned to the site and finished the cleanup. All of the collected oil and contaminated soil was taken to RTT, our onsite used oil and materials processor for treatment and/or recycling.

The bucket truck was subsequently repaired, inspected, and tested before being returned to service



1430 Sparrows Point Boulevard • Sparrows Point, MD 21219

May 25, 2011

CERTIFIED RETURN RECEIPT REQUESTED

Mr. Greg Sonberg
Maryland Department of the Environment
Oil Control Division
1800 Washington Boulevard Suite 620
Baltimore, Maryland 21030-1708

Dear Mr. Sonberg:

This letter will serve as the spill report for RG Steel Sparrows Point, LLC for the month of April, 2011. 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

Russell Becker
Division Manager, Environmental Engineering and Affairs
E-mail Address: Russ.Becker@rg-steel.com

Phone: 410-388-6622
Fax: 410-388-6529
www.rg-steel.com

June 30, 2011

CERTIFIED RETURN RECEIPT REQUESTED

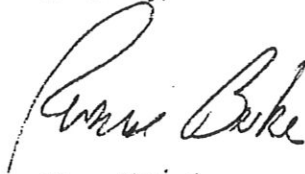
Mr. Greg Sonberg
Maryland Department of the Environment
Oil Control Division
1800 Washington Boulevard Suite 620
Baltimore, Maryland 21030-1708

Dear Mr. Sonberg:

This letter, and its attachment, will serve as the spill report for RG Steel Sparrows Point, LLC for the month of May, 2011. 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



RG STEEL, LLC

1430 Sparrows Point Boulevard • Sparrows Point, MD 21219

May 24, 2011

CERTIFIED RETURN RECEIPT REQUESTED

Mr. Greg Sonberg
Maryland Department of the Environment
Oil Control Division
1800 Washington Boulevard Suite 620
Baltimore, Maryland 21030-1708

Dear Mr. Sonberg:

This letter, and its attachment, will serve as the spill report for the spill that occurred at Outfall 001 and the Pennwood Boiler House on May 5, 2011.

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

Russell Becker
Division Manager, Environmental Engineering and Affairs
E-mail Address: Russ.Becker@rg-steel.com

Phone: 410-388-6622
Fax: 410-388-6529
www.rg-steel.com

Mr. Greg Sonberg – May 24, 2011

Date and Time – 5/5/11 at approximately 1900 hours

Amount Spilled – Approximately 1240 gallons

Spilled To – Ground and Water

Material Spilled – No. 6 Fuel Oil

Location – Pennwood Power Plant and Outfall 001

MDE Contacted – Valerie Green on 5/5/11 at 2000 hours

NRC/Coast Guard Contacted – PO Arsenault on 5/5/11 at 2006 Hours Report No. 975004

On 5/5/11 at approximately 1900 hours a No. 6 Oil spill was discovered at the Pennwood Boiler House. Oil had escaped from the boiler house fuel oil system, exited the building and entered several drains on the south side of the boiler house. These drains flowed to plant Outfall 001.

Upon discovery of the spill, the building was inspected to locate the source and, when found, it was secured. Simultaneously the drains outside of the building were diked to prevent further entry of oil. Outfall 001 was inspected as well and only a small amount of oil was found collected behind the oil retention boom which is permanently installed at the end of the Outfall. However, as the night wore on oil that was already in the drains entered the outfall and was contained by the boom. We also found oil in the cooling water inlet canal to the power plant.

In response we used two vacuum trucks, from Mobile Dredging, to begin cleanup at the building drains on the south side of the facility. An additional two Mobile Dredging vacuum trucks were used to collect oil from an intermediate containment boom located about midway down the Outfall 001 canal. At the final containment boom we stationed three vacuum trucks from A2Z Environmental. In addition we used a boat, also from A2Z, to deploy several additional layers of harbor boom to supplement the permanently installed boom. The boat was also used to deploy sorbent boom and sweeps as further containment and to corral the oil, from behind the containment boom within the Pennwood Canal and bring it to shore within reach of the vacuum trucks.

The following morning, as the cleanup continued, we deployed two additional vacuum trucks, one from FCC Environmental and one from ACE Environmental, to begin capturing the oil found in the inlet canal at the power plant. Another boat, from A2Z, was used to scout the surrounding waters for oil. No recoverable oil was identified beyond the containment boom.

After day one FCC and ACE were released and were replaced by additional equipment from A2Z. A2Z deployed sweeps and was able to recover the bulk of the oil after several days of work. Additional sorbent material was installed in an effort to collect the sheen remaining in the inlet canal. A2Z also installed an additional set of sorbent booms approximately three quarters of

Mr. Greg Sonberg - May 24, 2011

the way down the Outfall 001 Canal to capture oil that had escaped from the first permanently installed boom.

After the first several days the cleanup gradually ramped down into a mop up action of chasing isolated pockets of contamination and sheen. Several layers of additional harbor boom and sorbent remained in place as a precaution to guard against any oil that might have entered the power plant through the inlet canal and remained trapped inside.

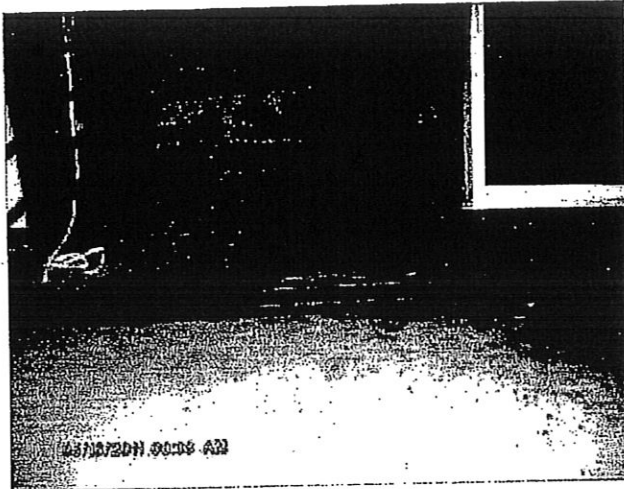
As of 5/23/11 the last of the additional harbor boom was removed. At present no active cleanup is being done. Various layers of sorbent remain as a precaution in addition to the permanently installed harbor booms. The outfall is checked several times per day and no additional accumulations have been observed. The United States Coast Guard maintained an onsite presence during the major portion of the cleanup.

Our investigation revealed that the cause of the spill was a one half inch diameter bleed line on the No. 6 Fuel Oil system on No. 2 Boiler that was left open during a restart of the oil system. When the fuel oil system was returned to service oil was released through the open bleed line and continued to flow until the spill was discovered. To prevent a recurrence of this type of incident the following is being done or has been done.

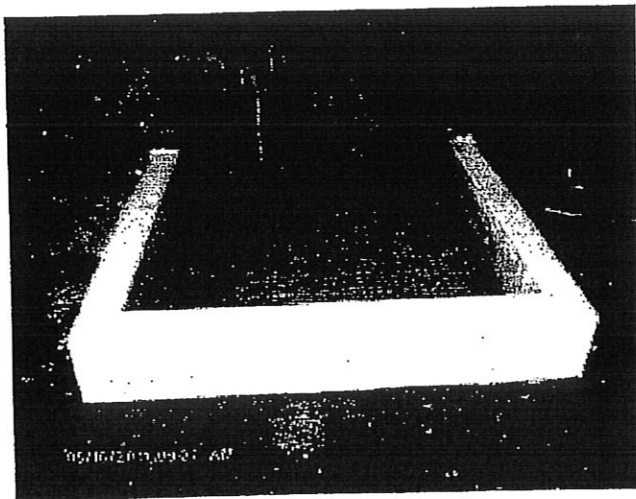
- All operators at the power plant have been made aware of the incident
- Startup checklists have been reviewed and modified where necessary
- Retraining where necessary will be done
- All procedures will have a sign off area where the person who is assigned the task will sign and affirm that the task was done
- An operator will be assigned to be at the fuel oil burner level prior to resetting the fuel oil system for a particular boiler
- Valve labeling will be reviewed and amended as necessary
- An engineering project has been initiated to determine the feasibility of automating the fuel oil system with interlocks and alarms
- The sewer drains, involved in the spill are being blocked off with concrete curbing
- All other sources of oil from the power plant are being identified to determine what other preventative measures are practicable

Mr. Greg Sonberg – May 24, 2011

- All plant sources that report to Outfall 001 are being identified to determine what other preventative measures are practicable



Typical drain on south side of power plant with cover removed



Typical drain on south side of power plant with new containment curb and grating

July 20, 2011

CERTIFIED RETURN RECEIPT REQUESTED

Mr. Greg Sonberg
Maryland Department of the Environment
Oil Control Division
1800 Washington Boulevard Suite 620
Baltimore, Maryland 21030-1708

Dear Mr. Sonberg:

This letter will serve as the spill report for RG Steel Sparrows Point, LLC for the month of June, 2011. 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

September 27, 2011

CERTIFIED RETURN RECEIPT REQUESTED

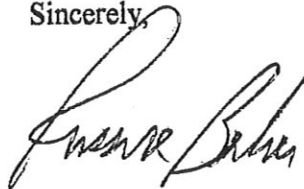
Mr. Greg Sonberg
Maryland Department of the Environment
Oil Control Division
1800 Washington Boulevard Suite 620
Baltimore, Maryland 21030-1708

Dear Mr. Sonberg:

This letter will serve as the spill report for RG Steel Sparrows Point, LLC for the month of August, 2011. 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

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

Mr. Greg Sonberg – September 27 2011

Date and Time – August 8, 2011 at approximately 1606 hours

Amount Spilled – Approximately 25 gallons

Spilled To – Soil and asphalt

Material Spilled – Renolin RO 46

Location – Central Warehouse Building

MDE Contacted – Larry Cohen 8/9/11 at 1739 hours

Art Mayfield 8/10/11 at 1414

On 8/9/11, at approximately 1606 hours a spill of approximately 25 gallons of Renolin RO 46 was reported to Environmental by Central Warehouse supervision. A fifty five gallon drum of the oil had been punctured and some of the oil had escaped from the building and flowed into the parking lot. The bulk of the oil was contained either on asphalt or inside of the building but some came in contact with bare soil just outside of the bay door. No sewers or waterways were involved.

When the spill was discovered, by warehouse supervision, facility personnel were directed to use oil absorbent to contain the oil. That material was subsequently placed into drums pending removal. Additionally, Mobile Dredging and Pumping was called to the scene to remove the contaminated soil, by the bay doors, and to pressure wash the contaminated area of the parking lot.

Contaminated wash water was taken to our onsite wastewater treatment plant for treatment. Contaminated soil was taken to Recycling and Treatment Technologies of Baltimore (RTT) our onsite processor of used oil and contaminated materials. The material was solidified and ultimately taken to our onsite landfill for disposal.

After cleaning of the parking lot, the impacted area was sealed with commercial driveway sealer. Additionally, the bare soil area on both sides of the bay door was paved over with asphalt.

Warehouse supervision, during the course of their investigation of the incident, found that the drum was observed by warehouse personnel to be leaking during the afternoon of August 8, 2011. They also found efforts were made to contain the oil. However, no report of the spill was made to supervision. The new date of the spill was reported to Art Mayfield, of your office, on 8/10/11.

All warehouse employees were made aware of the events surrounding the spill and the proper procedures for handling drums and reporting of spills was also reviewed. Also, as a result of this incident one individual was transferred out of the warehouse.



1430 Sparrows Point Boulevard • Sparrows Point, MD 21219

November 16, 2011

CERTIFIED RETURN RECEIPT REQUESTED

Mr. Greg Sonberg
Maryland Department of the Environment
Oil Control Division
1800 Washington Boulevard Suite 620
Baltimore, Maryland 21030-1708

Dear Mr. Sonberg:

This letter will serve as the spill report for RG Steel Sparrows Point, LLC for the month of October, 2011. 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

Russell Becker
Division Manager, Environmental Engineering and Affairs
E-mail Address: Russ.Becker@rg-steel.com

Phone: 410-388-6622
Fax: 410-388-6529
www.rg-steel.com



1430 Sparrows Point Boulevard • Sparrows Point, MD 21219

December 8, 2011

CERTIFIED RETURN RECEIPT REQUESTED

Mr. Greg Sonberg
Maryland Department of the Environment
Oil Control Division
1800 Washington Boulevard Suite 620
Baltimore, Maryland 21030-1708

Dear Mr. Sonberg:

This letter and its attachment will serve as the spill report for RG Steel Sparrows Point, LLC for the month of November, 2011. 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

Russell Becker
Division Manager, Environmental Engineering and Affairs
E-mail Address: Russ.Becker@rg-steel.com

Phone: 410-388-6622
Fax: 410-388-6529
www.rg-steel.com

Mr. Greg Sonberg – December 9, 2011

Date and Time – November 22, 2011

Amount Spilled – Approximately 30 gallons

Spilled To – Soil and asphalt

Material Spilled – Hydraulic fluid

Location – West of Truck Dock 67

MDE Contacted – Mary Blanton at 1122 hours

On 11/22/11, at approximately 2249 hours a spill of approximately 30 gallons of hydraulic fluid occurred near Truck Dock 67. Investigation revealed that Coil Hauler 202 experienced a burst hydraulic hose near the vehicle's transmission. The fluid spilled onto an asphalt roadway and some flowed onto the unpaved road shoulder. None entered any sewer or water body.

When the spill was discovered, by the vehicle operator, he parked the vehicle, shut it down and called for assistance. Plant security was first on the scene and blocked off the road to prevent traffic from contacting the oil on the roadway. Plant environmental personnel were notified and arranged for Mobile Dredging and Pumping to dispatch cleanup personnel and equipment to the scene. Additionally, mechanics were sent to the location to assess the situation and determine the steps necessary to repair the vehicle.

The mechanics determined that a hydraulic hose, that serviced the vehicle's transmission, had leaked. A replacement hose was found and installed. The repair was tested and found to be sufficient and the vehicle was returned to service.

Mobile Dredging dispatched a vactor, pressure washer and a crew. They first removed the standing oil and contaminated soil. Following that, they pressure washed the roadway to remove any remaining hydraulic fluid with the vactor collecting the wash water. The cleanup materials were taken to RTT for solidification and eventual disposal at our onsite landfill.

January 23, 2012

CERTIFIED RETURN RECEIPT REQUESTED

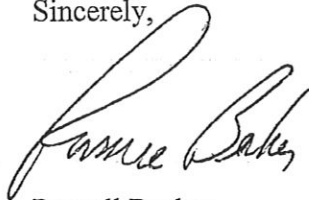
Mr. Greg Sonberg
Maryland Department of the Environment
Oil Control Division
1800 Washington Boulevard Suite 620
Baltimore, Maryland 21030-1708

Dear Mr. Sonberg:

This letter, and its attachment, will serve as the spill report for RG Steel Sparrows Point, LLC for the month of December, 2011. 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

Mr. Greg Sonberg – January 23, 2012

Date– December 21, 2011

Amount Spilled – Approximately 20 gallons

Spilled To – Soil

Material Spilled – Hydraulic fluid

Location – No. 1 BOF Scrubber

MDE Contacted – Art Mayfield 1240 Hours on 12/22/12

On 12/22/12, at approximately 1000 hours, Environmental Engineering and Affairs was notified of a spill of hydraulic fluid from No. 1 BOF Scrubber. Approximately twenty gallons of fluid was contained on the ground around the base of the scrubber. None entered any plant sewer or water body.

Investigation revealed that the spill occurred the previous evening and had just recently been discovered. At the time of the spill the BOF was down but the scrubber was running. The source of the spill was a broken nipple that was part of the pressure side of the hydraulic system.

The scrubber was shut down and the hydraulic system was inspected. The broken nipple was replaced and the scrubber was restarted and tested for leaks. No leaks were found and the scrubber was returned to service.

Mobile Dredging and Pumping Inc., our onsite industrial cleaning company, was tasked with the cleanup. Mobile Dredging used a pressure washer to clean the spilled fluid from the surface of the scrubber and a vactor to recover the wash water and spilled fluid from the ground. The cleanup materials were taken to RTT, our onsite materials process firm, for processing.