



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

January 13, 2011

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Russell Becker
Program Manager
Environmental Engineering & Affairs
Severstal Sparrows Point
1430 Sparrows Point Blvd
Sparrows Point, MD 21219

Subject: Consent Decree, Civil Action Numbers JFM-97-558 and JFM-97-559
EPA's Revised Approval of the June 18, 2010 "Coke Oven Area Interim Measures
Work Plan Supplemental Information"

Dear Mr. Becker:

By this letter, the United States Environmental Protection Agency ("EPA") hereby revises its approval of the Interim Measures Work Plan submitted by Severstal – Sparrows Point LLC ("Severstal") to EPA, as documented in Severstal's June 18, 2010 "Coke Oven Area Interim Measures Work Plan Supplemental Information, June 2010" ("IM Work Plan"). Based on discussions among EPA, the Maryland Department of the Environment ("MDE") and Severstal that took place on several occasions, including June 3, 2010 and October 7, 2010, Severstal shall construct and operate six remediation cells in accordance with the Schedule set forth below. Severstal shall employ technologies at these cells (groundwater pumping, product skimming, groundwater injection, soil vapor extraction, air sparging, and enhanced biodegradation) singly or in combination to reduce the source of the plume and control its movement.

In order to meet the Schedule below, Severstal shall identify, and submit timely and complete applications for, all local, State and Federal permits which are required for each remediation cell. At a minimum, Severstal shall submit a timely and complete application for a groundwater discharge permit from MDE for the groundwater pump and treat systems proposed for Cell 2 and Cell 5, see <http://www.mde.state.md.us/assets/document/permit/MDE-WMA-PER013.pdf>. Severstal shall treat groundwater to meet applicable MDE permit requirements with respect to discharge to the infiltration gallery.

Severstal shall construct and operate the cells in accordance with the IM Work Plan and the Schedule set forth below:

Cell 1 (Vapor Extraction) – Severstal shall continue to operate Cell 1.

Cell 2 (Vapor Extraction and Groundwater Pump and Treat) – EPA understands that the groundwater treatability study currently taking place is expected to be completed in mid January, 2011. Severstal

shall submit a complete groundwater discharge permit application to MDE no later than February 1, 2011. Severstal shall submit its proposed final design for Cell 2 to MDE and EPA within ninety (90) calendar days of receiving all required groundwater discharge permit approvals from MDE. Severstal shall complete construction and begin operation of Cell 2 within one hundred eighty (180) days of receiving necessary permit approvals from MDE;

Cell 3 (Vapor Extraction) - Severstal shall submit its proposed final design for Cell 3 to MDE and EPA by March 1, 2011. Severstal shall complete construction and begin operation of Cell 3 by July 3, 2011;

Cell 4 (Bioremediation) – Severstal shall submit its proposed final design for Cell 4 to MDE and EPA by April 1, 2011. Severstal shall complete construction and begin operation of Cell 4 by July 3, 2011.

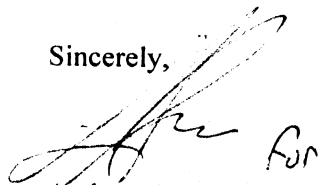
Cell 5 (Groundwater Pump and Treat) – Severstal shall submit a complete groundwater discharge permit application to MDE no later than February 1, 2011. Severstal shall submit its proposed final design for Cell 5 to EPA and MDE within ninety (90) calendar days of receiving necessary permit approvals from MDE. Severstal shall complete construction and begin operation of Cell 5 within one hundred eighty (180) calendar days of receiving necessary permit approvals from MDE.

Cell 6 (Product Skimming) Severstal shall continue to operate Cell 6. By July 3, 2011 Severstal shall, at a minimum, undertake the following enhancements of Cell 6: (1) Construct and operate additional monitoring wells to further delineate the extent of floating product in the Benzol Processing Area; (2) Identify, convert, and operate existing monitoring or other wells, or construct and operate additional wells, as skimmer wells to optimize product recovery; and (3) Evaluate the effectiveness of groundwater depression pumping and dual phase extraction for optimizing product recovery.

Severstal shall submit monthly progress reports by the last day of each month for the previous month describing the performance of each completed cell that is in operation, including efforts taken to optimize performance of such cells. Severstal may request a reduction in the frequency of submission of progress reports in the future after operation of all completed cells is stabilized.

Please call me at (215) 814-3426 if you have technical questions regarding this matter. For legal questions, please have your attorney contact Susan Hodges, Senior Assistant Regional Counsel at (215)814-2643 or Charles Howland, Senior Assistant Regional Counsel, at (215)814-2645.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Fan", is written over a faint, larger signature that is partially obscured.

Andrew Fan, Project Manager
Land and Chemicals Division

cc: Barbara Brown, MDE