Severstal
International

September 11, 2009

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

Subject: **Update on Recovery and Recycling of Iron Bearing and Concrete Materials**
Coke Point Landfill
Consent Decree, Civil Action JFM-97-558

Dear Ms Brown:

Information is provided with respect to the ongoing waste minimization and recycling efforts at Coke Point Landfill as requested by correspondence from the Maryland Department of the Environment dated August 13, 2009. This information is submitted in accordance with the specified 30 day response timeline outlined in the letter.

Removal Process Description

Material Separation Procedures

Iron bearing materials are being reclaimed using typical construction equipment including; dozers, excavators and a specialty designed salvage machine. The salvage machine is used to magnetically separate iron bearing materials. Magnetically separated materials are either processed further at the Fritz hammer mill facility to provide a feed product for the ironmaking operation or are utilized as part of recycled scrap metal at the Basic Oxygen Furnace at the Sparrows Point facility.

Oversize concrete debris is identified and segregated from the feed to the salvage machine. These materials will be transported to the on-site concrete recycling area where further processing (removal of rebar and crushing) will occur to provide a marketable product.

Separated materials that will remain as waste are replaced within the horizontal limit within the existing footprint of the landfill. Waste placement will not occur in locations with existing topographic elevations less than 11 (NAVD, 1988).

Dust Control

The Contractor controls dust from the material recovery operations and subsequent transport to the on-site processing equipment. Dust abatement includes the use of road watering equipment and truck mounted water cannons to be used as necessary at the working face and during the material separation process at Coke Point Landfill. Fugitive emissions from the on-site processing equipment including the hammer mill are being controlled in accordance with the air permits that have been issued for the equipment.

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Odor Control

The Contractor will control odors, if present, from waste materials recovered from the landfill and from the working face of operations. Odor is not anticipated to be an issue based on the inert nature of waste materials typically disposed at Coke Point Landfill. If required, odor control will be accomplished via sprayers on wheeled equipment with a movable spray arm mounted on a rotating platform.

Stormwater Control

The Contractor will conduct operations at Coke Point Landfill to ensure that stormwater is retained on-site. Gravel filter berms will be placed around the working areas to retain runoff and aid in stormwater control.

Recovered Material Quantities

Summary reports are attached that detail by month quantities and types of materials recovered for reuse from Coke Point Landfill. Materials recovered from August 2008 (effort approved by MDE in July 2008) through July 2009 are summarized as follows:

Date Materials Recovered	Metallic Material (tons)	Concrete Brick (tons)
August – October 2008	25,232	3,380
March – July 2009	20,509	

Note that the period from November 2008 through February 2009 was an extended outage of the steelmaking operations at the facility and no recovery efforts were in progress.

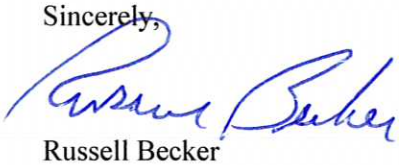
Status

Waste minimization and material recovery efforts at Coke Point Landfill are anticipated to continue for several years. The future use of Coke Point Landfill, including the schedule for slope regrading actions to support the stable placement of additional waste materials, is currently contingent upon the ongoing assessment by the Maryland Port Administration for the potential use of this area for dredge spoil management. Timely communication will be provided to the Department should key decisions be made concerning the future use of this area either by the MPA or Severstal.

Inspections of the stormwater and sediment controls at the shoreline perimeter of Coke Point Landfill were recently conducted by the Department on June 24, 2009 and follow-up on July 28, 2009. Additional required controls identified in the follow-up inspection report will be addressed by September 11, 2009.

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

Sincerely,



Russell Becker
Environmental Program Manager

Attachment

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FRITZ ENTERPRISES, INC.

Sparrows Point Division

August 2008

Units: NET TONS

Date	Truck Loads	Metallic Material Iron/Steel	Concrete Brick, etc.	Miscellaneous	Total Net Tons
1	12	265	100		**365**
2					
3					
4	2		40		**40**
5	8	200	20		**220**
6	3		100		**100**
7	8	182	60		**242**
8	2		50		**50**
9					
10					
11	2		60		**60**
12	7	110	90		**200**
13					
14	8	70	170		**240**
15	11	100	210		**310**
16					
17					
18					
19	13	372			**372**
20	8		240		**240**
21	25	280	480		**760**
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					
Total	**109**	**1,579**	**1,620**		**3,199**

Sparrows Point Divisi

FRITZ ENTERPRISES, INC.

September 2008

Units: NET TONS

Date	Truck Loads	Metallic Material Iron/Steel	Concrete Brick, etc.	Miscellaneous	Total Net Tons
1					
2	26	1,182			1,182
3	20	856			856
4	12	506			506
5	10	375			375
6					
7					
8	14	651			651
9	15	606			606
10	17	622			622
11	17	699			699
12	13	219			219
13					
14					
15	13	568			568
16	16	711			711
17	10	466			466
18	20	519	140		659
19	6	256			256
20					
21					
22	18	719			719
23	30	635	280		915
24	15	595			595
25	14	570			570
26					
27					
28					
29	22	867			867
30	24	1,095			1,095
31					
Total	**332**	**12,717**	**420**		**13,137**

Sparrows Point Divisio

FRITZ ENTERPRISES, INC.

October 2008

Units: NET TONS

Date	Truck Loads	Metallic Material Iron/Steel	Concrete Brick, etc.	Miscellaneous	Total Net Tons
1	39	432	380		**812**
2	30	506	340		**846**
3	5		100		**100**
4					
5					
6	28	928	200		**1,128**
7	37	855	320		**1,175**
8	16	758			**758**
9	17	751			**751**
10	16	690			**690**
11					
12					
13	16	747			**747**
14	12	574			**574**
15	15	795			**795**
16					
17	13	593			**593**
18					
19					
20					
21					
22					
23	12	486			**486**
24	19	864			**864**
25					
26					
27					
28	13	544			**544**
29	12	500			**500**
30	16	690			**690**
31	6	223			**223**
Total	**322**	**10,936**	**1,340**		**12,276**

Sparrows Point Division

FRITZ ENTERPRISES, INC.

November 2008

Units: NET TONS

NO ACTIVITY

Date	Truck Loads	Metallic Material Iron/Steel	Concrete Brick, etc.	Miscellaneous	**Total Net Tons**
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					
Total					

Sparrows Point Division

FRITZ ENTERPRISES, INC.

December 2008

Units: NET TONS NO ACTIVITY

Date	Truck Loads	Metallic Material Iron/Steel	Concrete Brick, etc.	Miscellaneous	**Total Net Tons**
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					
Total					

FRITZ ENTERPRISES, INC.

Sparrows Point Division

January 2009

Units: NET TONS NO ACTIVITY

Date	Truck Loads	Metallic Material Iron/Steel	Concrete Brick, etc.	Miscellaneous	**Total Net Tons**
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					
Total					

FRITZ ENTERPRISES, INC.

Sparrows Point Division

February 2009

Units: NET TONS NO ACTIVITY

Date	Truck Loads	Metallic Material Iron/Steel	Concrete Brick, etc.	Miscellaneous	**Total Net Tons**
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					
Total					

FRITZ ENTERPRISES, INC.

Sparrows Point Division

March 2009

Units: NET TONS

Date	Truck Loads	Metallic Material Iron/Steel	Concrete Brick, etc.	Miscellaneous	Total Net Tons
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12	8	346			**346**
13	2	87			**87**
14					
15					
16					
17					
18					
19	8	356			**356**
20	5	232			**232**
21	4	183			**183**
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					
Total	**27**	**1,204**			**1,204**

FRITZ ENTERPRISES, INC.

Sparrows Point Division

April 2009

Units: NET TONS

Date	Truck Loads	Metallic Material Iron/Steel	Concrete Brick, etc.	Miscellaneous	Total Net Tons
1	4	170			**170**
2					
3					
4					
5					
6					
7					
8	6	250			**250**
9	13	572			**572**
10					
11					
12					
13					
14	3	138			**138**
15	3	105			**105**
16	6	258			**258**
17	5	198			**198**
18					
19					
20					
21					
22					
23	3	130			**130**
24	7	281			**281**
25					
26					
27	5	207			**207**
28	5	233			**233**
29	9	392			**392**
30	11	419			**419**
31					
Total	**80**	**3,353**			**3,353**

FRITZ ENTERPRISES, INC.

Sparrows Point Division

May 2009

Units: NET TONS

Date	Truck Loads	Metallic Material Iron/Steel	Concrete Brick, etc.	Miscellaneous	Total Net Tons
1	4	119			**119**
2					
3					
4	2	79			**79**
5	3	130			**130**
6	2	86			**86**
7	3	128			**128**
8	3	120			**120**
9					
10					
11	3	131			**131**
12	6	253			**253**
13	9	411			**411**
14					
15	4	183			**183**
16					
17					
18					
19	6	333			**333**
20	6	254			**254**
21	2	78			**78**
22	2	95			**95**
23					
24					
25					
26	5	248			**248**
27	6	287			**287**
28					
29	2	94			**94**
30					
31					
Total	**68**	**3,029**			**3,029**

FRITZ ENTERPRISES, INC.

Sparrows Point Division

June 2009

Units: NET TONS

Date	Truck Loads	Metallic Material Iron/Steel	Concrete Brick, etc.	Miscellaneous	Total Net Tons
1	16	536			**536**
2	3	133			**133**
3	2	108			**108**
4	5	231			**231**
5	10	446			**446**
6					
7					
8	3	148			**148**
9	2	87			**87**
10	11	515			**515**
11	5	231			**231**
12	1	44			**44**
13	2	92			**92**
14					
15					
16					
17	19	849			**849**
18	2	95			**95**
19					
20					
21					
22	10	431			**431**
23	9	450			**450**
24	2	101			**101**
25	11	517			**517**
26	7	325			**325**
27					
28					
29	3	160			**160**
30	17	699			**699**
31					
Total	**140**	**6,198**			**6,198**

FRITZ ENTERPRISES, INC.

Sparrows Point Division

July 2009

Units: NET TONS

Date	Truck Loads	Metallic Material Iron/Steel	Concrete Brick, etc.	Miscellaneous	Total Net Tons
1					
2	1	47			**47**
3					
4					
5					
6	11	460			**460**
7	2	90			**90**
8	6	268			**268**
9	10	462			**462**
10	12	521			**521**
11					
12					
13					
14					
15					
16	11	503			**503**
17	16	676			**676**
18					
19					
20	3	151			**151**
21	16	738			**738**
22	8	379			**379**
23					
24	9	418			**418**
25					
26					
27	4	218			**218**
28	4	228			**228**
29	15	670			**670**
30	4	180			**180**
31	17	716			**716**
Total	**149**	**6,725**			**6,725**