
Multimedia Consent Decree

1997 Annual Report

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

Prepared by
Bethlehem Steel Corporation
Sparrows Point Division



February 1998

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Introduction

This Annual Report is prepared in accordance with a Multimedia Consent Decree (Decree) entered into by Bethlehem Steel Corporation (BSC), the U.S. Environmental Protection Agency Region III (EPA) and Maryland Department of the Environment (MDE). The Decree was signed in February, 1997, entered by the Court and became effective on October 8, 1997. Notification to the parties did not occur until October 22, 1997. Deliverables due 90 days or less from the entry date were extended by 2 weeks, except the Kish Reduction Plan.

There are three locations in the Decree where information is required to be reported annually; Section VI - Paragraph 4, Section XII - Paragraph 5, and Section XVIII - Paragraph 2. This Annual Report complies with the requirements of these three paragraphs. For organization purposes, this Annual Report will present information in the order listed above. Project cost information required in Section XVIII will be presented with each work plan discussion presented in Report Section 1.

Decree Requirements

Section VI, Paragraph 4, Waste Minimization, requires a report on the previous year's status on implementing each Work Plan required under Section VI including sampling data related to hazardous waste regulatory determinations. Text from the Decree specific to this requirement is as follows:

4. *BSC shall submit to EPA and MDE an annual report due February 15 for the previous calendar year which describes the status of implementing each Work Plan under this Section VI, and includes sampling data related to hazardous waste regulatory determinations.*

Section XII, Paragraph 5, Notification and Certification of Documents, requires a progress report on actions completed detailed in Sections V and VII. The complete text from the Decree specific to this report is as follows:

5. *In addition to any other requirement of this Consent Decree, BSC shall submit to EPA and MDE a written annual report on the work undertaken pursuant to Sections V and VII that, with respect to such work:*
 - a) *Describes and assesses the progress and percentage of completion of all actions which have been taken toward achieving compliance with this Consent Decree during the reporting period;*
 - b) *Includes a summary of all results of sampling and tests and all other data and reports received or generated by BSC or their contractors or agents in the reporting period;*

- c) *Includes any modifications to the work plans or other schedules or personnel that BSC has proposed to EPA and MDE that have been approved by EPA and MDE;*
- d) *Summarizes all contacts with representatives of the local community, or public interest groups during the reporting period relevant to the activities in this Consent Decree;*
- e) *Summarizes all problems or potential problems encountered during the reporting period, including but not limited to, unresolved or anticipated delays encountered by BSC that may affect the future schedule for implementation of the requirements of this Consent Decree;*
- f) *Describes actions being taken to rectify problems;*
- g) *Describes changes and additions to pertinent BSC personnel and contractors during the reporting period;*
- h) *Describes all actions, including but not limited to, data collection and implementation of work plans, which are scheduled for the next reporting period; and*
- i) *Describes all releases reportable under any federal and/or state law which took place at the Facility during the reporting period, the status of mitigation of such releases, and the government oversight agency, contact name and telephone number.*

Finally, an annual report is required by Section XVIII, Paragraph 2, Civil Penalties and Pollution Prevention Credits which requires reporting of actual pollution prevention expenditures during the previous calendar year for pollution prevention projects described in Section VI. Text from the Decree specific to this requirement is as follows:

2. *On or before February 15 of each calendar year, BSC shall submit to MDE and EPA a written report, including supporting documentation, which describes actual pollution prevention expenditures during the previous calendar year for the pollution prevention projects described in Section VI of this Consent Decree.*

Section V pollution prevention projects are listed in Paragraph 1b. This expenditure reporting will be included in the progress descriptions for waste minimization projects described in Section VI in the following Section 1. Attachments A and B are included at the end of this report as supporting cost documentation.

Section 1

Waste Minimization Work Plan Progress

The Waste Minimization Section of the Decree requires the following Work Plans or Reports:

- Sump/Tank Work Plan
- Tin Mill Canal Discharge Report
- Strong Caustic Solution Reuse Work Plan
- Blast Furnace Gas Cleaning Slurry Recycle Work Plan
- Recycling of BOF Fume Sludge Work Plan
- Humphreys Creek Wastewater Treatment Plant Sludge Work Plan
- Dredging of the Tin Mill Canal Work Plan
- Facility Wide Waste Minimization Plan

This section of the annual report will briefly describe the nature of each report or work plan, what the current status of the work activity is and what the planned activity will be in 1998. To satisfy Decree Section XVIII on pollution prevention expenditures, each item will list the costs incurred in 1997. No sampling data related to hazardous waste regulatory determinations was gathered in 1997.

BSC agreed to pay a penalty of \$350,000 to MDE no later than thirty days after the effective date of the Decree. On October 28, 1997, a payment of \$350,000 was made in compliance with Section XVIII, Paragraph 1.

Sump/Tank Work Plan

Required Due Date: October 8, 1998 (12 months from entry date)

This work plan will address an inventory and visual inspection of sumps, associated trenches located in the Cold Sheet Mill and the Tin Mill that contain significant amounts of acid, caustic, plating, or coating solutions. Also included are all above ground storage tanks with capacity greater than 500 gallons that store hazardous substances.

No activities occurred in 1997 on this work plan. It is anticipated that the work plan team will be formed and hold the first organizational meeting in April, 1998 to start the preparation of the Work Plan. The Plan submittal is expected to be on schedule.

Tin Mill Canal Discharge Report

Required Due Date: July 8, 1998 (9 months from entry date)

1997 Expenditures: \$8,000

This report identifies and quantifies all discharges to Tin Mill Canal. The data generated by a study conducted in 1994 that identifies the discharges to Tin Mill Canal may be used for this report to the extent the data satisfy this requirement.

CH2M HILL was retained in 1994 to study discharges to Tin Mill Canal and prepare a report. Sampling and flow monitoring activities occurred in 1994 to characterize the flow, measure total suspended solids, total oil and grease and metals being discharged to Tin Mill Canal. This report was reviewed and finalized in July, 1997 and is expected to be released ahead of the Decree schedule in the first quarter of 1998. No sampling activities associated with this report took place in 1997. Once this report has been submitted, no further action is required on this item.

Strong Caustic Solution Reuse Work Plan

Required Due Date: December 19, 1997 (2 months from entry date plus 2 weeks)

1997 Expenditures: \$343,500

This work plan provides for the beneficial reuse of strong caustic solutions at Humphreys Creek Wastewater Treatment Plant. The work plan additionally describes the controlled discharge of spent pickle liquor and pickling rinsewater to the Tin Mill Canal.

This work plan was prepared and submitted on December 19, 1997, on schedule. The control of spent pickle liquor is accomplished through the controlled additions at one of two 60,000 gallon storage tanks. Spent strong caustic solutions are reused at the Humphreys Waste Water Treatment Plant through controlled additions from a new storage tank. This new storage facility was constructed during the summer of 1997 and commissioned for service in December, 1997. Spent pickle liquor and spent caustic solutions are used to replace commercial wastewater treatment chemicals. While the work plan was submitted in December, 1997, all work proposed has been completed. No further activities or follow up to the work plan are planned in 1998.

Blast Furnace Gas Cleaning Slurry Recycle Work Plan

Required Due Date: October 8, 1998 (12 months from entry date)

1997 Expenditures: \$5,644

A work plan must be prepared to recycle slurry from the treatment of gas from the blast furnace by installing a hydrocyclone facility to remove zinc and lead from the solids in the slurry and recycle the solids into either the sinter plant or the iron and steel making processes. The scope of work for this project envisions installing hydrocyclones and ancillary process equipment including thickeners, process tanks and pumps, filters and chemical feed equipment

to be located near the Blast Furnace/Sinter Plant facilities. The new equipment will be an integral part of the existing NPDES permitted wastewater treatment system at the Blast Furnace.

Preliminary background studies occurred in 1997 including discussions with Sparrows Point Division engineering and Blast Furnace personnel. Some field work took place in an effort to reduce overall project costs. Planning activities and project team formation will begin in June, 1998.

Recycling of BOF Fume Sludge Work Plan

Required Due Date: April 8, 1999 (18 months from entry date)

1997 Expenditures: \$116,500

A work plan must be prepared to recycle into either the sinter plant or the iron or steel making processes oxide fume sludge generated from the treatment of the exhaust gas from the Basic Oxygen Furnace

Limited testing activity occurred in 1997 on this project. Process development and limited field trials began in summer 1997 with good preliminary results. Planning activities and team formation for preparation of the work plan is expected to begin in December 1998.

Humphreys Creek Wastewater Treatment Plant Sludge Work Plan

Required Due Date: October 8, 1999 (24 months from entry date)

1997 Expenditures: \$2,000

A work plan will be prepared to recycle into the sinter plant the sludge generated from the treatment of wastewater at Humphreys Creek Wastewater Treatment Plant.

Preliminary discussions with plant operations to determine recycle options occurred in 1997. No further activity on the work plan is anticipated in 1998.

Dredging of the Tin Mill Canal Work Plan

Required Due Date: October 8, 1998 (12 months from entry date)

1997 Expenditures: \$0

A work plan must be prepared for handling the material generated during maintenance dredging of the Tin Mill Canal consistent with the description of maintenance dredging described in Attachment F of the Decree.

No activity occurred on this work plan in 1997. Planning activities and project team formation is expected to occur by May, 1998.

Facility Wide Waste Minimization Plan

Required Due Date: April 8, 1999 (18 months from entry date)

BSC agreed to develop and implement a Facility Wide Waste Minimization Plan. The goal of this task is to identify, if possible, ways to further reduce the volume, mobility and/or toxicity of solid wastes, hazardous wastes, and hazardous constituents generated at the Facility.

No activities on the preparation of the Facility Wide Minimization Plan occurred in 1997. Team formation and planning activities are expected in the Fall, 1998.

Section 2

Progress on Actions

Paragraph 5 of Section XII requires a description of the work undertaken in Sections V and VII of the Decree. This section describes the progress on actions undertaken in 1997. Projects described in these two sections are as follows:

Section V - Corrective Measures projects including:

- Rod & Wire Mill Groundwater Treatment Plant
- Site Wide Investigation.

Section VII - Compliance Requirements including:

- Report on BOF Fugitive Emissions Improvements since the last reporting period
- Kish Reduction Work Plan
- Landfill Compliance Plan.

Further, Paragraph 5 provides for discussion requirements in subparagraphs a) through i). This section of the report will respond to each of the subparagraphs in order.

- a) Describe and assess the progress and percentage of completion of all actions which have been taken toward achieving compliance with this Consent Decree during the reporting period;*

Rod & Wire Mill Groundwater Treatment Plant

This remediation project is the only ongoing Interim Measure project identified under the Decree. This groundwater treatment facility was constructed in 1986 in response to a Phase I and Phase II investigation of a cadmium and zinc contaminated area near the Rod and Wire Mill. Groundwater pumping and treatment has continued each year from 1987 to the present. Through 1997, a total of 31.7 million gallons of groundwater have been pumped and treated. Water treatment plant efficiency has been greater than 98 percent with cadmium concentrations in the effluent typically below 0.06 mg/l. Significant remediation has occurred in the highest impacted wells since 1987. Cadmium concentrations in shallow well 88 has been reduced 94 percent from 1,150 mg/l to 67 mg/l. Cadmium concentrations in intermediate well 27 has been reduced by 89 percent from 157 mg/l to 18 mg/l.

An annual report is required for this interim measure, due the end of January for the previous year. Detailed information about sampling and analytical results are found in these reports. The 1997 report was submitted on schedule on January 30, 1998. In order to bring the treatment system into closure focus over the next 2 years, it is expected that a revised closure plan will be drafted in second quarter of 1998.

Site Wide Investigation

The Site Wide Investigation (SWI) is a comprehensive evaluation of the potential for both current and future risk to human health and the environment from current and past releases of

hazardous wastes and hazardous constituents at the Facility. The SWI consists of seven tasks that are detailed in Attachments B and C of the Decree. These tasks are:

- Preparation of the Description of Current Conditions Report
- Pre-investigation Evaluation of Corrective Measures Technologies
- Preparation of the Site Wide Investigation Work Plan
- Site Wide Investigation
- Investigation Analysis
- Laboratory and Bench-Scale Studies
- Reports

The first task under the SWI is the preparation of the Description of Current Conditions Report (CCR). At the end of 1997, the CCR was in process of final review and editing, and was submitted for review and approval on January 20, 1998. The work plan for the Site Wide Investigation will be prepared and submitted 75 days after agency approval of the CCR.

Report on BOF Fugitive Emissions Improvements

This report summarizes the improvements on environmental control equipment installed at the BOF since September, 1993. The report was under preparation at the end of 1997 and was submitted for review and approval on January 20, 1998. No further action is needed for this item.

Kish Reduction Work Plan

The Kish Reduction Work Plan was submitted for review and approval on January 6, 1998. This report summarized the kish reduction actions taken in previous years, those taken and implemented currently and those kish reduction actions planned over the next 3 years. This report is currently being reviewed by EPA and MDE. Implementation of the Work Plan will begin after Plan approval.

Landfill Compliance Plan

The compliance plan requires the preparation of a landfill operations plan and an engineering plan for Greys Landfill and Coke Point Landfill. Both plans provide for improved operations at the two landfills. Both of these reports are currently being prepared and are expected to be delivered July 15, 1998, on time.

- b) Includes a summary of all results of sampling and tests and all other data and reports received or generated by BSC or their contractors or agents in the reporting period;*

Sampling and analytical work occurred in two areas of the Decree; the Interim Measure project at the Rod and Wire Mill groundwater treatment system and the BOF roof monitoring.

All sampling work and subsequent analytical results gathered for the Cadmium and Zinc groundwater treatment plant are discussed in the previous section of this report and reported in the Annual Report submitted January 30, 1998. Generally, the results indicate continued improvement in groundwater quality in the shallow and intermediate water bearing strata.

BOF roof monitoring observations compliant with the Decree began on October 28, 1997. A summary of the observation results are presented in the following table.

Observation Date	Highest six Minutes	Observation Date	Highest six Minutes	Observation Date	Highest six Minutes
10/28/97	5	10/29/97	0	10/30/97	18.5
11/3/97	18.3	11/5/97	1.3	11/11/97	4.8
11/12/97	0	11/15/97	2.9	11/17/97	16.9
11/18/97	21.3	11/19/97	0.8	11/20/97	1.9
11/24/97	4.4	11/25/97	8.1	11/26/97	3.3
12/2/97	10.6	12/3/97	2.9	12/6/97	1.3
12/8/97	2.5	12/9/97	2.3	12/11/97	5.4
12/16/97	4.2	12/17/97	3.8	12/18/97	2.9
12/22/97	3.3	12/23/97	0.2	12/26/97	9.2
12/29/97	0	12/31/97	6.6		

- c) *Includes any modifications to the work plans or other schedules or personnel that BSC has proposed to EPA and MDE that have been approved by EPA and MDE;*

No modifications to work plans or schedules have been proposed at the end of 1997. No personnel changes or additions are proposed for the year 1998.

- d) *Summarizes all contacts with representatives of the local community, or public interest groups during the reporting period relevant to the activities in this Consent Decree;*

Several informational meetings have been held in 1997 with representatives from community groups and with the community at large. A chronology of meetings and presentations in 1997 is as follows:

February 25, 1997 A press conference was held with the media and general public announcing the Decree. The first public meeting conducted by MDE, EPA and BSC to present the Multimedia Consent Decree was held at the Sparrows Point High School that evening.

April 22, 1997 A general Multimedia Consent Decree presentation was given to the Community Commitment Initiative (CCI) Group, a group consisting of community leaders.

April 29, 1997 A general plant tour of the Sparrows Point Division was provided for the CCI group.

August 14, 1997 Met with the Chesapeake Bay Foundation, Messrs. Thomas Grasso and George Chamel II, to provide an overview of the Decree requirements and current status and to develop a mechanism to keep them informed.

October 7, 1997 Met with the CCI group to discuss the October 30 general public meeting. A steering committee was elected from the CCI group for the purpose of administering a grant provided by BSC. Conditions of the grant were discussed, specifically the qualifications of the technical advisor to be hired by the Committee.

October 30, 1997 Conducted a general public meeting to provide detailed information on Decree requirements, projects and schedules. MDE and EPA were present and participated in the presentation.

November 20, 1997 As a follow up to the October 30 public meeting, a meeting was held at Sparrows Point Plant with Christine Gangi, Guido Guarnaccia, Frank Greeves, and Robert Konder, members of the general community. Information was provided regarding questions asked at the public meeting, additional information about the Decree was also provided.

- e) *Summarizes all problems or potential problems encountered during the reporting period, including but not limited to, unresolved or anticipated delays encountered by BSC that may affect the future schedule for implementation of the requirements of this Consent Decree;*

No problems with schedules occurred in 1997 on any planned deliverables. No delays are expected on any deliverable due in 1998. The CCR report was submitted on the due date of January 20, 1998. The next deliverable in the Site Wide Investigation series is the Site Wide Investigation Work Plan due 75 days after agency approval and acceptance of the CCR.

- f) *Describes actions being taken to rectify problems;*

No problems occurred in 1997 where corrective actions were necessary.

- g) *Describes changes and additions to pertinent BSC personnel and contractors during the reporting period;*

No changes to BSC personnel or to contractors being utilized for Decree deliverables occurred in 1997 or are anticipated in 1998.

- h) *Describes all actions, including but not limited to, data collection and implementation of work plans, which are scheduled for the next reporting period; and*

The following work plans are expected to be submitted in 1998

- Site Wide Investigation Work Plan
- Tanks/Sumps Trenches Inventory Work Plan
- Blast Furnace Gas Cleaning Slurry Recycle Work Plan
- Dredging of the Tin Mill Canal Work Plan
- Kish Reduction Work Plan
- Landfills Compliance Work Plan

In accordance with the planned actions described in each of the work plans, BSC intends to carry out the schedules submitted.

- i) *Describes all releases reportable under any federal and/or state law which took place at the Facility during the reporting period, the status of mitigation of such releases, and the government oversight agency, contact name and telephone number.*

The following is a list of spills occurring in 1997 at Sparrows Point Division reported to MDE.

April 26, 1997 Approximately 10 gallons of mineral oil was released at the Penwood Power Station as a transformer being refilled overflowed. The spill was contained, excess oil absorbed, and impacted soil removed to an approved off site facility. All work was completed within 24 hours. No further action is necessary. This release was reported to Mr. Wilkenson of MDE.

May 21, 1997 Approximately 10 gallons of diesel fuel spilled due to an overturned tractor trailer on Canal Road near Maryland Slag Plant. Absorbent was used to capture all free diesel fuel and as soon as it was possible, impacted soil was excavated. The absorbent and impacted soil was transported to an approved disposal facility. All work was completed within 24 hours. No further action is necessary. This release was reported to Mr. Meyers at MDE.

June 25, 1997 Approximately 400 gallons of No. 6 Fuel Oil was discovered under a trestle near Truck Dock 434. A valve on the relief valve manifold was mistakenly left open causing oil to discharge into a relief valve catch box. Oil overflowed this catch box causing the spill. All oil was contained and removed with appropriate removal equipment and transported to a recycle facility. All impacted soil was excavated and transported to an approved disposal facility. All work was completed within 48 hours. No further action is necessary. This release was reported to Mr. Meyers at MDE.

June 29, 1997 Approximately 300 gallons of diesel fuel was spilled at a refueling area at the Hub when an equipment fuel tank being filled overflowed. The area was contained with an absorbent, excess fuel was removed, and impacted soil excavated. All absorbent and impacted soil was transported to an approved disposal facility. All work was completed within 48 hours. No further action is necessary. This release was reported to Mr. Jarenko at MDE.

August 24, 1997 Approximately 25 gallons of oil skimmed from Tin Mill Canal was spilled when a brill skimmer boom was not discharging into a holding tank as designed. Once discovered, the equipment was secured into its appropriate position. The spilled oil was collected and impacted soil excavated. The oil and impacted soil was transported to an approved disposal facility. All work was completed within 24 hours. This release was reported to Ms. James at MDE.

ATTACHMENT A

LOCATION -0104- 9431 01

SPARROWS POINT DIVISION
APPROPRIATION MANAGEMENT AND REPORTING SYSTEM
SUMMARY BY CAPITAL ORDER SUBORDER

REPORT 1
DATE OF RUN - 01/07/98
FOR DAY OF MONTH - Jan 7, 98
PAGE 001

CAPITAL ORDER NO: 9431 ELIM DISCHARGE TO T.M. CANAL/PRE E

TEAM MEMBERS: MSS GHA

SUB S ORD T	DESCRIPTION	ROLL-UP APPROP	EST FINAL COST	COMMITMENT TOTAL	EFC MINUS COMMIT	ACTUAL CURRENT MONTH	EXPENDITURES CURRENT YEAR	TO DATE	COMMIT MINUS EXPEND	SCH OPER DATE	FIN COMP DATE
001	PRELIMINARY ENGINE ERING	842,000	665,000	658,789	6,211	11,700	343,505	665,000	-6,211	1297	4Q97
999 C	SPARES (6838,6840, 6869,6871,6874-207	50,000	0	0	0	0	0	0	0	1197	4Q97
TOTAL - ALL OPEN SUBS		842,000	665,000	658,789	6,211	11,700	343,505	665,000	-6,211		
TOTAL - ALL CLOSED SUBS		50,000	0	0	0	0	0	0	0		
9431 CAPITAL ORDER TOTAL		892,000	665,000	658,789	6,211	11,700	343,505	665,000	-6,211	0198	1Q98

ERROR: CURRENT APPROP. 846,000 DOES NOT EQUAL ROLL-UP APPROP. 822,000

ATTACHMENT B

Estimated Spending in 1997 for
Selected Waste Recycling Projects
Sparrows Point Division

		BOF Fume Recycle Studies		BF Hydrocyclone Recycle Studies		HCWWTP Sludge Recycle Studies		Kish Recycling Studies	
		hrs	\$	hrs	\$	hrs	\$	hrs	\$
1	Background Studies								
	J. D. Lynn			68	\$ 5,644	24	\$ 1,992		
2	Laboratory and Field Testing								
	J. D. Lynn	522	\$ 43,326					74	\$ 6,142
	R. L. Greenawalt	6	\$ 498					0	
	G. Keyser(contract personnel)	497	\$ 13,800					124	\$3,400
	J. Bartosh (contract personnel)	217	\$ 4,340	0		0			
	R. T. Sewald (contract personnel)	0		0		0		0	
	Colvin Smith - Sp.Pt. BOF (20% of time)	400	\$ 20,000						
	A. Brown - Sp.Pt. Mat'l Hndlng \$1/ton		\$ 3,000						
	Langenfelter Field Testing		\$ 15,000						
	Chemical Analysis		\$ 6,000						
3	Facility Modifications								
	BOF Shop Modifications- silo repairs		\$ 10,000						
	No. 3 Open Hearth Shop		\$ 0						
4	Betz - water treatment testing		\$ 500						
									4900
5.	Testing Equipment		\$ 0						
6.									
	TOTAL		\$ 116,464		\$ 5,644		\$ 1,992		\$ 14,442

Estimated Spending in 1997 for
Selected Waste Recycling Projects
Sparrows Point Division

		BOF Fume Recycle Studies		BF Hydrocyclone Recycle Studies		HCWWTP Sludge Recycle Studies		Kish Recycling Studies	
		hrs	\$	hrs	\$	hrs	\$	hrs	\$
1	Background Studies								
	J. D. Lynn			68	\$ 5,644	24	\$ 1,992		
2	Laboratory and Field Testing							74	\$ 6,142
	J. D. Lynn	522	\$ 43,326					0	
	R. L. Greenawalt	6	\$ 498					124	\$3,400
	G. Keyser(contract personnel)	497	\$ 13,800						
	J. Bartosh (contract personnel)	217	\$ 4,340	0		0			
	R. T. Sewald (contract personnel)	0		0		0		0	
	Colvin Smith - Sp.Pt. BOF (20% of time)	400	\$ 20,000						
	A. Brown - Sp.Pt. Mar'l Hndlng \$1/ton		\$ 3,000						
	Langenfelter Field Testing		\$ 15,000						
	Chemical Analysis		\$ 6,000						
3	Facility Modifications								
	BOF Shop Modifications- silo repairs		\$ 10,000						
	No. 3 Open Hearth Shop		\$ 0						
4	Betz - water treatment testing		\$ 500						4900
5	Testing Equipment		\$ 0						
6									
	TOTAL		\$ 116,464		\$ 5,644		\$ 1,992		\$ 14,442

BETHLEHEM STEEL CORPORATION - SPARROWS POINT DIVISION
 BOF ROOF MONITOR OBSERVATIONS (MULTI-MEDIA)

DATE OF OBSERVATION	HIGHEST SIX MINUTES
10/28/97	5
10/29/97	0
10/30/97	18.5
11/3/97	18.3
11/5/97	1.3
11/11/97	4.8
11/12/97	0
11/15/97	2.9
11/17/97	18.9
11/18/97	21.3
11/19/97	0.8
11/20/97	1.9
11/24/97	4.4
11/25/97	8.1
11/26/97	3.3
12/2/97	10.6
12/3/97	2.9
12/6/97	1.3
12/8/97	2.5
12/9/97	2.3
12/11/97	5.4
12/16/97	4.2
12/17/97	3.8
12/18/97	2.9
12/22/97	3.3
12/23/97	0.2
12/26/97	9.2
12/29/97	0
12/31/97	6.6

OBSERVATIONS FOR THREE DAY ROLLING AVERAGE STARTED DURING WEEK OF OCTOBER 25, 1997
 PER DIRECTION OF RALPH HALL (MDE)



**Bethlehem Steel Corporation
Sparrows Point Division**

Environmental Control Office

To: Bdb Abate

From: Joe Dolan

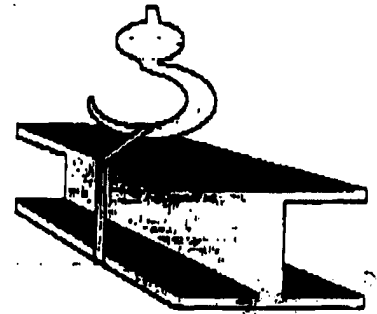
Date: 2/4/58

Number Of Pages: 2

Bdb,

Let me know if
this suits your needs.

Joe



Privilege and Confidentiality Notice

This message is intended only for the use of the individual(s) to whom it is addressed and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that an dissemination, distribution, or copying of this communication is strictly prohibited. If you have received the communication in error, please notify us immediately at 410-388-6549 and return the original message to us at the above address via the U.S. Postal Service. Thank You!



BETHLEHEM STEEL CORPORATION**SPARROWS POINT DIVISION
SPARROWS POINT, MD 21219****CERTIFIED RETURN
RECEIPT REQUESTED**

January 20, 1998

Mr. Richard Collins
Hazardous and Solid Waste Administration
Maryland Department of the Environment
2500 Broening Highway
Baltimore, Maryland 21224

Dear Mr. Collins:

This letter will serve as the required spill report for the Sparrows Point Division for the Fourth Quarter of 1997. There were no spills which occurred during this quarter.

There was, however, an error in the spill report which was submitted for the Third Quarter of 1997. The spill which was reported as occurring on July 9, 1997 should not have been reported on the Third Quarter report. The spill actually occurred on June 29, 1997 and was reported in the spill report for the Second Quarter of 1997.

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

Sincerely,

A handwritten signature in black ink that reads "Erroll B. Hay" with a stylized flourish at the end.

Erroll B. Hay, Supt.
Environmental Health,
Control, and Safety

JJD/prf

cc: J. T. Mendelson
J. J. Dolan (3 copies)
File

SPARROWS POINT DIVISION

Bethlehem Steel Corporation
Sparrows Point, Maryland 21219



April 22, 1997

CERTIFIED RETURN RECEIPT REQUESTED

Mr. Richard Collins
Hazardous and Solid Waste Administration
Maryland Department of the Environment
2500 Broening Highway
Baltimore, Maryland 21224

Dear Mr. Collins:

This letter will serve as the required spill report for the Sparrows Point Division for the ^{Final} Second Quarter of 1997. There were no spills which occurred during this quarter.

If there are any questions, please refer them to Joe Dolan at 388-5991 and discuss them with him.

Sincerely,

Erroll B. Hay
Superintendent, Environmental
Health, Control, and Safety

JJD:kam

cc: J. T. Mendelson
J. J. Dolan (3 copies)
File

BETHLEHEM STEEL CORPORATION

SPARROWS POINT DIVISION
SPARROWS POINT, MD 21219



CERTIFIED RETURN RECEIPT REQUESTED

July 25, 1997

Mr. Richard Collins
Hazardous and Solid Waste Administration
Maryland Department of the Environment
2500 Broening Highway
Baltimore, Maryland 21224

Dear Mr. Collins:

This letter will serve as the required spill report for the Sparrows Point Division for the Second Quarter of 1997. Reports for spills which occurred during the Second Quarter of 1997 are attached.

If there are any questions, please refer them to Joe Dolan at 388-5991 and discuss them with him.

Sincerely,

Erroll B. Hay
Superintendent, Environmental
Health, Control, and Safety

JJD:

cc: J. T. Mendelson
I. J. Dolan (3 copies)
File

Encl.

DATE/TIME: 4/26/97 AT APPROXIMATELY 2200 HOURS
AMOUNT: APPROXIMATELY TEN GALLONS
SPILLED TO: GROUND
MATERIAL SPILLED: MINERAL OIL
LOCATION: PENNWOOD POWER PLANT SUBSTATION

At approximately 2200 hours on April 26, 1997 a spill of 10 gallons of mineral oil occurred at the Pennwood Power Plant substation. All of the oil was contained on the ground and none entered any plant sewer or waterway.

Our investigation revealed that the spill occurred while a transformer was being refilled with mineral oil after having maintenance performed. The cause of the spill was that the maintenance personnel miscalculated the amount of oil left in the transformer and overfilled it.

The overfill was immediately noticed and the refilling operation was shut down. Speedi-dri was then spread on the oil to immobilize and absorb it. The contaminated soil beneath the oil was also subsequently removed and disposed of at an approved off site facility.

To prevent a recurrence maintenance personnel were re-instructed in the proper way to refill transformers.

DATE/TIME: 5/21/97 AT APPROXIMATELY 1230 HOURS
AMOUNT: APPROXIMATELY TEN GALLONS
SPILLED TO: GROUND
MATERIAL SPILLED: DIESEL FUEL
LOCATION: CANAL ROAD

On May 21, 1997 at approximately 1230 hours a spill of about 10 gallons of diesel fuel occurred on Canal Road in the vicinity of the Maryland Slag Plant. All of the diesel fuel was contained on the ground and none entered any plant sewer or waterway.

Our investigation revealed that the cause of the spill was an overturned tractor trailer. The truck was hauling steel and as it negotiated the curve in the road the steel load shifted and caused the truck to overturn. The tank cap came off of the fuel tank and approximately ten gallons of diesel fuel escaped from the tank.

As soon as it was safe to do so absorbent was placed beneath the tractor to immobilize the diesel fuel until the tractor could be righted and cleanup could begin. The tractor was removed at approximately 1500 hours and the contaminated soil and sorbent material were removed shortly thereafter. Both were sent to an approved outside facility for disposal. An accident investigation was undertaken and the cause of the accident has been undetermined. This job has been done in the same manner for years without incident.

DATE/TIME: 6/25/97 AT APPROXIMATELY 1230 HOURS
AMOUNT: APPROXIMATELY 400 GALLONS
SPILLED TO: GROUND
MATERIAL SPILLED: NO. 6 FUEL OIL
LOCATION: TRESTLE NEAR TRUCK DOCK 434

On June 25, 1997, at approximately 12340 hours, a spill of about 400 gallons of No. 6 Fuel Oil was discovered beneath the trestle near Truck Dock 434. All of the oil was contained on the ground and none entered any plant sewer or waterway.

Our investigation revealed that at the time of the spill the sixteen inch oil transfer pipeline from our oil reception facility to our tank farm was being pressure tested. A valve on the relief valve manifold was mistakenly left open and this allowed the oil to flow into the relief valve catch box. The catch box filled up and overflowed until the time that the spill was discovered and the pressure test was shut down. All of the escaped oil was contained either in the catch box or on the ground around the catch box. None entered any sewer or body of water.

Mobile Dredging and Pumping, our onsite cleanup contractor, was immediately summoned to the site. They used vacuum trucks to remove the standing oil and the oil from the catch box. This oil was then recycled through U.S. Filter, formerly known as PORI. Plant cleanup forces followed Mobile Dredging and pressure washed the outside of the catch box and any contaminated structures near the spill. This oil water mixture was collected by vacuum truck and was also recycled through U.S. Filter. Lastly, the contaminated soil was removed and transported to an approved offsite disposal facility.

To prevent a recurrence the pressure testing procedure has been modified and all personnel who participate in this job have been retrained in the use of the revised procedure.

DATE/TIME: 6/29/97 AT APPROXIMATELY 1100 HOURS
AMOUNT: APPROXIMATELY 300 GALLONS
SPILLED TO: SOIL
MATERIAL SPILLED: DIESEL FUEL
LOCATION: REFUELING AREA AT THE HUB

On June 29, 1997, at approximately 1100 hours, a spill of about 300 gallons of diesel fuel occurred. All of the material was contained on the ground and none entered any plant sewer or waterway.

Our investigation revealed that the spill resulted from a refueling operation on a piece of heavy equipment. The operator began the filling operation and left the area of the pump to tend to other duties. When he returned he noticed that the fuel tank had overflowed onto the ground. He immediately shut down the pump and began containment operations.

The contaminated speedi-dri and soil were subsequently removed from the area and sent to an approved outside facility for disposal. To prevent a recurrence all personnel were reinstructed in the proper practices for refueling vehicles, the pump nozzle has been replaced, and signs detailing proper refueling practices were ordered and will be posted at the fueling facility when received.

BETHLEHEM STEEL CORPORATION

SPARROWS POINT DIVISION
SPARROWS POINT, MD 21219



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

October 28, 1997

Mr. Richard Collins
Hazardous and Solid Waste Administration
Maryland Department of the Environment
2500 Broening Highway
Baltimore, Maryland 21224

Dear Mr. Collins:

This letter will serve as the required spill report for the Sparrows Point Division for the Third Quarter of 1997.

If there are any questions, please refer them to Joe Dolan at 388-5991 and discuss them with him.

Sincerely,

Erroll B. Hay, Superintendent
Environmental Health,
Control and Safety

JJD/prf

cc: J. T. Mendelson
J. J. Dolan (3)
File

Attachment

Date/Time - 7/9/97 at approximately 1030 hours

Amount - Approximately 500 gallons

Spilled To - Ground

Material Spilled - Diesel Fuel

Location - Hub Fueling Station

On July 9, 1997, at approximately 1030 hours, a spill of about 500 gallons of diesel fuel was discovered on the ground at the Hub fueling station. All of the oil was contained on the ground and none entered any sewer or body of water.

Our investigation revealed that the spill occurred while an operator was fueling a piece of mobile equipment. While he was filling the unit he was called away from the pump. He did not shut off the pump prior to leaving his equipment and he discovered the spill upon his return to the pump.

The operator immediately shut off the pump and called for help. The spilled diesel fuel was diked and covered with sand. After the oil had been absorbed by the sand the sand and contaminated soil were placed into a dumpster box for shipment to an approved offsite disposal facility.

By leaving his vehicle unattended while fueling the operator failed to follow proper procedure. He and all other operators have been reinstructed in proper fueling practices. Additionally the dispenser nozzle was checked and found to be faulty. It was replaced with a new nozzle.

Date/Time - 8/24/97 at approximately 0600 hours

Amount - Approximately 25 gallons

Spilled To - Ground

Material Spilled - Used Oil

Location - No. 4 Brill Skimmer Holding Tank

At approximately 0600 hours on August 24, 1997 a spill of about 25 gallons of used oil was discovered on the ground around the No. 4 Brill Skimmer Holding Tank. None of the oil entered any plant sewer or waterway.

Our investigation revealed that the skimmer boom was not properly secured above the holding tank opening and was discharging recovered used oil onto the ground instead of into the holding tank.

The spill was discovered during a routine check of the skimmer by operating personnel. Upon discovery of the spill the boom was properly secured and the oil began to flow into the holding tank. The spilled oil and contaminated soil were subsequently recovered, placed into a dumpster box, and transported to an approved offsite disposal facility.

To prevent a recurrence skimmer operators were reinstructed in the proper procedure used to secure the skimmer boom above the holding tank. Additionally, the routine checks of the skimmer will continue.

No. 8 Chrome line developed a leak
 in a valve between the plate tank
 and the slater storage tank. Attempts
 were made to repair the valve - unsuccessfully.
 At approx 0300 hrs (5/11/97) the
 decision was made to send the solution
 to TANK X.

The line to Tank X developed a leak
 which discharged to the clean water
 sump which discharges to THE.
 The clean water sump pump was then
 shut down.

Best est. is that ~ 1500 gallons
 was discharged to THE.

MDE Contact 1000 hrs 5/11/97
 PCO JAMES

Allen Williams, Emergency Response
 for MDE called back at 1015 hrs

Since the Material was discharged to the
 THCA line (as opposed to CR RECOVERY) this
 incident was reported as a Treatment Facility by-pass

5/11/97

BETHLEHEM STEEL CORPORATION - SPARROWS POINT DIVISION
SPILLS

DATE OF SPILL	MATERIAL SPILLED	AMOUNT SPILLED	SPILLED TO	CAUSE OF SPILL	MFC	MFC CONTACT	STATE	STATE CONTACT	ES	ES CONTACT
APR. 26, 1987	INDUSTRIAL OIL	19 GALLONS	PW KIPPER BAY	OVERFILLED TRANSFORMER	NO	POO WILKINSON	NO	NO	NO	NONE
MAY 21, 1987	DIESEL FUEL	18 GALLONS	GROUND	OVERTURNED TRUCK	NO	JOHN MEYERS	NO	NO	NO	NONE
JUN. 25, 1987	NO. 6 OIL	800 GALLONS	GROUND	BLEW PRESSURE RELIEF VALVE	NO	MRL MEYERS	YES	NO	NO	NONE
JUN. 28, 1987	DIESEL FUEL	500 GALLONS	GROUND	OVERFLOWED FUEL TANK WHILE FILLING	NO	DAVE JARENKO	YES	NO	NO	NONE
AUG. 24, 1987	USED OIL	25 GALLONS	GROUND	DRILL BIT/DRILLER NOT ANCHORED PROPERLY	NO	JAMES	YES	NO	NO	NONE

16.