

ISG Sparrows Point LLC

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Multimedia Consent Decree

2006 Annual Report

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

Prepared by
ISG Sparrows Point LLC

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1.0 Introduction

This Annual Report is prepared in accordance with a Multimedia Consent Decree (Decree) that was originally 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.

International Steel Group (ISG) purchased Bethlehem Steel Corporation including the Sparrows Point Division on May 8, 2003. In 2005, ISG was acquired by Mittal Steel and the Sparrows Point facility in Baltimore County, Maryland is currently operating as ISG Sparrows Point LLC as a part of Mittal Steel USA (the "Facility" as defined by the Consent Decree). The Facility is complying with the requirements outlined by the Decree.

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 2006 that comply with the requirements of these three paragraphs. 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 ISG Sparrows Point to implement the Decree.

2.0 Waste Minimization Plan

The following Work Plans or Reports are required by the Consent Decree:

- 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

A summary of the current status of these projects as of the year 2006 is presented in the following sections. To satisfy Decree Section XVIII on pollution prevention expenditures, each section also lists the costs incurred in 2004.

Sump/Tank Work Plan

Description of 2006 Activity:

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

ISG will periodically inspect and provide maintenance of the sumps and above ground storage tanks identified in the Work Plan as part of the routine operating protocol for the facility. Records of inspections and maintenance activities will be reported in the Facility Wide Waste Minimization Plan updates.

2006 Expenditures: \$20,000

Tin Mill Canal Discharge Report

A Tin Mill Canal Discharge Report was submitted in July 1998 in accordance with requirements of the Consent Decree. Additional actions to reduce discharges to the Tin

Mill Canal have been implemented or will be implemented as part of ongoing improvements at the Facility. Completed actions since 1998 are summarized as follows:

- Reduction of process wastewater and oily wastewater discharges associated with the shut down and replacement of older cold rolling processing facilities;
- Reduction of process wastewater discharges from the Chrome Recovery Wastewater Treatment Facility associated with the replacement of the use of sulphur dioxide in the wastewater treatment process;
- Reduction of oil discharges from the Hot Strip Mill associated with the lubrication conservation and oil waste minimization program;
- Improved oil recovery efforts from oily wastewater discharges from the Cold Sheet Mill and Tin Mill. The improvements were completed at the on-site oil reprocessing facility and included: modifications to API separators, additional tanks for improved retention time, and use of emulsion breaking chemicals;
- Improved management of waste streams involving mixtures of oils/solids and water. Management processes have been implemented to capture appropriate waste streams prior to entering the canal and removing entrained solids and oils.

Strong Caustic and Spent Pickle Liquor Solution Reuse Work Plan

This plan has been implemented and caustic/ spent pickle liquor solutions are currently being beneficially reused. Spent pickle liquor (SPL) solutions generated at the facility were either beneficially reused on-site in the wastewater treatment process or shipped off-site for beneficial reuse or disposal at other various facilities.

Recycle of Blast Furnace Gas Cleaning Slurry Solids

Description of 2006 Activity:

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

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

- Phase 1 Engineering - Evaluate current status of water treatment system. This engineering was completed by end of October 2006;
- Phase 2 Engineering - Develop modifications for the water treatment system including solids management and recycling systems. Anticipated to be complete by end of 2nd Qtr 2007.

- Capital Project Appropriation Submittal - Develop and provide cost-benefit basis for corporate approval - 3rd quarter 2007
- Implementation/Construction of Project - Anticipated to be complete by 2008.

In addition to the hydrocyclone facility, preliminary plant trials showed that the blast furnace filter cake (and possibly the hydrocyclone overflow filter cake) can also be used to condition the molten BOF slag during the steel making operation. The slag conditioning step is done to provide effective slag splashing and coating of the BOF vessel. Limestone and other similar materials are commonly used for this purpose. If successful, the hydrocyclone overflow filter cake remaining after separation of suitable revert material could be recycled using this technique. This process is seen as an added benefit that will be evaluated once the hydrocyclone facility is operational.

2006 Expenditures: \$40,000

Recycling of BOF Fume Sludge

Description of 2006 Activity:

Recycling of BOF fume sludge is currently being conducted at Sparrows Point. The use of processed BOF fume sludge referred to as RS was utilized in 2006 in amounts depending on the need of the BOF steelmaking operation. RS is a blend of sludge filter cake and slag; the recipe of the RS is adjusted according to the need for coolant for steelmaking.

Overall, approximately 16,000 tons of RS were recycled for the year. The current practice is projected to continue in 2007.

2006 Expenditures: \$173,500

Recycling of Humphreys Creek Wastewater Treatment Plant Sludge

Description of 2006 Activity:

Technology review is ongoing to provide an evaluation of various processes to recycle the wastewater treatment plant sludge. An important milestone was achieved in 2004 when the new treatment plant was completed at the Humphreys Creek Wastewater Treatment Plant. Sludge characteristics from this new plant are now being evaluated to determine their potential for recycling.

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. The first project was unsuccessful and the other two proved to be cost-prohibitive. Additionally, reuse of this material in the sinter plant has been further restricted due to emerging 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. As a result of this reduction of oil and grease content in the sludge, direct recycling to the Sinter Plant may be a viable recycling option for these materials. Humphreys Creek sludge and Hot Strip Mill scale materials are currently being investigated to determine if they can be pelletized to provide a feedstock to the sinter plant. A small sample of Humphreys Creek sludge and Hot Mill scale has been sent out to be pelletized and, when complete, the resultant material will be evaluated for acceptance at the Sinter Plant.

Off-site pilot testing was conducted in 2006 to determine the applicability of oil-removal processes for various site materials including mill scale. With removal of the oil content, specifications could be achieved for recycling of materials in the sinter making process at Sparrows Point. Thermal removal processes were evaluated with a successful removal of oil content from the mill scale. Current plans include pilot testing of a recovery unit on-site that will remove oil from the mill scale and potentially the wastewater treatment plant sludge to permit recycling of the solids in the Sinter Plant. The projected program will evaluate performance and cost feasibility of this recycling process.

2006 Expenditures: \$20,000

Maintenance Dredging of the Tin Mill Canal

Description of 2006 Activity:

Maintenance dredging of the Tin Mill Canal was not conducted in 2006

2006 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 . The Plan presents ongoing waste minimization activities that are currently conducted by the Sparrows Point facility under the directive of Mittal Steel USA. In addition, the document reviews and assesses waste minimization activities that have been completed or are underway at the facility.

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 recent ISO 14001 certification received by the facility. A comprehensive review of management of waste and by-product materials was completed in 2006. A summary of this program was included as part of the requirements for the Facility Wide Waste Minimization Plan that was submitted in November 2006.

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

Rod & Wire Mill Sludge Bin Remediation Area

During 2006, ISG Sparrows Point 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 2006 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 6,297,005 gallons of water was extracted from the two Former Sludge Bin Storage Area groundwater pumping wells (RW15-PZM020 and RW10-PZM020) during 2006. The average pumping rate for the pump and treat system for 2005 was 17,252 gallons per day (gpd), or 12 gallons per minute (gpm). A total of 415 pounds (lbs) of cadmium and 18,143 lbs of zinc was removed and treated from groundwater recovered from the Rod & Wire Mill area in 2006.

Groundwater elevation data indicate groundwater drawdown within a radius of influence that captures the contamination plume in the intermediate groundwater zone (approximately 20 to 30 feet below the ground surface) at the established pumping rates of approximately 5.7 and 5.0 gallons per minute (gpm), respectively, for recovery wells RW15-PZM020 and RW10-PZM020. Some attenuation of the radius of influence in the intermediate groundwater zone is evident proximate to TS04-PZM023, RW20-PZM020 and RW21-PZM023, possibly reducing contaminant capture here. The groundwater elevation data for the shallow zone (groundwater table surface to 15 feet in depth), combined with the chemistry data (further discussed below) for the shallow zone, also 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) continues to be inconclusive with regard to influence from the pump and treat system, however the chemistry data (further discussed below) document that contaminant migration in this zone is effectively controlled.

Groundwater monitoring data collected during 2006 suggest improvements in groundwater quality as compared to 2005. For cadmium, the 2nd quarter 2006 concentrations are generally lower compared to the 2nd quarter 2005 results; 16 wells had lower cadmium concentrations. Similarly for the 4th quarter, 14 wells had lower cadmium concentrations. Some of the bigger 4th quarter (most recent) cadmium concentration decreases were:

Shallow Zone (4th Quarter):

RW03-PZM003; from 6.2 ppm down to 0.94 ppm

RW06-PZM001; from 7.3 ppm down to 1.1 ppm

RW08-PZM003; from 23 ppm down to 16 ppm

RW12-PZM004; from 3 ppm down to 0.12 ppm

Intermediate Zone (4th Quarter):

RW16-PZM020; from 5.2 ppm down to 3.2 ppm

RW17-PZM019; from 16 ppm down to 9.8 ppm

For zinc, the 2nd quarter 2006 concentrations are generally lower compared to the 2nd quarter 2005 results; 20 wells had lower zinc concentrations. Similarly for the 4th quarter, 17 wells had lower zinc concentrations. Some of the bigger 4th quarter (most recent) zinc concentration decreases were:

Shallow Zone (4th Quarter):

RW02-PZM000; from 17 ppm down to 0.97 ppm

RW03-PZM003; from 150 ppm down to 37 ppm

RW06-PZM001; from 47 ppm down to 15 ppm

RW12-PZM004; from 130 ppm down to 5.9 ppm

Intermediate Zone (4th Quarter):

RW15-PZM020; from 52 ppm down to 47 ppm

RW17-PZM019; from 170 ppm down to 76 ppm

TS04-PZM023; from 35 ppm down to 27 ppm

Deep Zone (4th Quarter):

RW18-PZM047; from 12 ppm down to 4.9 ppm

The Proposed Operating Plan for 2007 is to: maintain institutional controls at the former storage area, continue operation, maintenance, and monitoring of the groundwater pump and treat system and complete semi-annual monitoring of groundwater consistent with procedures outlined in the approved July 2000 Work Plan.

Site Wide Investigation

Work completed for the Site Wide Investigation during 2006 included the following activities:

Work Plan to Evaluate the Nature and Extent of Releases to Groundwater from the Special Study Areas

The *Site Wide Investigation, Report of Nature and Extent of Releases to Groundwater from the Special Study Areas (Nature & Extent Report)* was completed and submitted to the Agencies on January 24, 2005. The report included a review of existing site characterization data, an update of the hydrogeologic conceptual model for the facility, and presentation of groundwater analytical results. Comments were received from the US EPA for the Nature and Extent Report on December 15, 2005.

Responses to the comments were prepared and submitted in 2006. Some of the specific comments were addressed in an initial document submitted in June 2006 with the remainder addressed in a summary report submitted in December 2006. Additional tasks were completed to provide the summary response report that included the following:

- Collection of a site-wide round of groundwater levels from the existing groundwater monitoring network;
- Review of existing hydrogeological data, field chemistry data, laboratory data to define trends; including a review of existing tidal study data;
- Preparation of perimeter cross-sectional diagrams for the Coke Oven and Coke Point areas;
- Development of updated cross-sections and iso-contour maps for selected analytes and water chemistry parameters for the Coke Oven and Coke Point areas;
- Preparation of an updated site conceptual model for site,

Based on the review of the existing information and the updated Site Conceptual Model, potential groundwater discharge areas of the Coke Oven and Coke Point areas of the facility were identified and include:

- Discharge of shallow groundwater into surface water of the Patapsco River near monitoring wells CO27 and CO30;
- Discharge of shallow groundwater into surface water of the turning basin along the eastern shoreline of this area;

- Limited vertical discharge of shallow groundwater into the intermediate zone in the source areas.
- Off-site groundwater movement from the intermediate zone at the northwest portion of the Coke Plant area that appears to be influenced by the pumping operation at the neighboring shipyard operation.

At this point, it has been requested that a review meeting be held to discuss the comments and response documents and present further details regarding a subsequent phase of the Site Wide Investigation.

Human Health Environmental Indicator Program

As part of a cooperative effort with the agencies, an assessment of current human health exposures at the facility was completed in 2005 with respect to the requirements outlined in RCRA Corrective Action Environmental Indicator RCRIS Code (CA 725). Confirmation was received from the agencies on September 1, 2005 that the evaluation of current human exposures at the facility was complete. The facility obtained a "yes" status or determination which indicates that there are no unacceptable human exposures to contamination that can be reasonably expected under current land- and groundwater-use conditions.

As part of the CA 725 Facility Investigation and Human Health Risk Evaluation, ISG Sparrows Point agreed to the following actions:

- Workers/Surface Soil section--Remove impacted materials exposed at the surface and cover the work area with slag as outlined in the approved CA725 document (Revision 5, August 30, 2005);
- Indoor air sampling from the occupied buildings of concern in the Coke Oven Area.

These actions were completed in 2005. The materials exposed at the surface identified in the CA725 Report located at the former Coal Tar Area have been removed and the area has been covered with slag or other inert material. Indoor air sampling activities were conducted in accordance with the request from the US EPA to address the concern for occupied buildings of concern in the Coke Oven Area at the facility. The sampling program documented that indoor air samples had benzene concentrations significantly below the Occupational Safety and Health Administration (OSHA) 8-hour time-weighted average. Confirmation of completion of these activities and an Air Sampling Report was sent to the agencies on January 24, 2006.

Ecological Risk Assessment Program

An ecological risk assessment program for the facility was developed and presented to the agencies on November 21, 2005. Various tasks were completed to develop the approach including an ecological reconnaissance that was completed by risk assessment

personnel in May 2005. The purpose of the reconnaissance was to collect observational data on ecological resources, native habitats, and potential contaminant migration and exposure pathways.

A path forward for ecological assessment tasks was agreed to on November 21, 2005. The proposed steps were as follows:

- Gain approval of strategy for evaluating ecological risks at the site from the USEPA and the Maryland Department of the Environment (MDE);
- Participate in a coordinated site visit with the USEPA to facilitate their understanding of the potential ecological issues at the Site;
- Conduct qualitative ecological surveys of on-site and off-site areas. The on-site and off-site surveys may be conducted at different times;
- Develop ERA Work Plan. Components to be factored into the Work Plan include:
 - Tiered approach consisting of completion of the SLERA, followed by the BERA, if necessary. It is assumed that the SLERA will include, in addition to a quantification of on-site screening-level risks, a comparison of groundwater concentrations to ecological surface water benchmarks. The results and conclusions of the SLERA will determine the need for a BERA.
 - Development of on-site Work Plan. Plan will identify areas of overlap between suitable ecological habitat and areas potentially impacted by SWMUs and AOCs, and identification of potential receptors in these areas of overlap;

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

The *Ecological Risk Assessment Work Plan for On Site Areas* was developed and submitted for agency review in June 2006. Review comments were received from the US EPA in September 2006. A response to the comments was prepared by ISG Sparrows Point and submitted to the agencies in October 2006. An acknowledgement was received from the US EPA with respect to the comment responses in November 2006. Based on the agreed upon approach for the facility, the *Ecological Risk Assessment Work Plan for On Site Areas* was finalized and submitted to the agencies in January 2007.

Work is scheduled to begin in accordance with the *Ecological Risk Assessment Work Plan for On Site Areas* in 2007. Site visits will be coordinated with the agencies in accordance with proper seasons for completion of required activities.

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 records for the compliance requirements for visible emissions from the Basic Oxygen Furnace (BOF) Shop roof monitor during 2006 have been attached in Appendix A. Monitoring 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

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. The project development included access to the structure by extension of slab hauler road. The south side of the building was altered to provide direct access to the facility. Additional wall sheeting, lighting, fire protection, internal grading and ramps for dumping were required for the process at a cost in excess of \$125,000. Additional improvements to the No. 2 Soaking Pit Building were completed in 2004 including the installation of a fabricated wall sheet to close in the east side of the building and further minimize fugitive emissions from the building. The cost of this project was approximately \$80,000.

Completion of this project satisfies the kish reduction requirements outlined in the Consent Decree.

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 2006 for the landfills were as follows:

Greys Landfill

The approved engineering compliance Improvements at Greys Landfill were initiated in 2005. Field activities began subsequent to notice on June 30, 2005. Erosion and sediment control and landfill stabilization activities began on January 3, 2006. A summary of progress during 2006 is as follows:

Items Completed:

- Sediment/stormwater storage basin and outlet controls
- Cement Deep Soil Mixing Stabilization Program
- Clearing and Grubbing
- 3-ft diversion swale excavated and riprap lined
- Landfill Counter Berms

Items in Progress:

- Cut and fill to subgrade
- Cap System
- Final Stormwater Controls and stormwater swales
- Remaining Counter Berms
- Seeding

Progress meetings for the project will be scheduled to be held with representatives of MDE as appropriate.

Coke Point Landfill

An engineering analysis of the Coke Point Landfill area was completed in 2004. The analysis included a geotechnical report summarizing the results of a specific subsurface investigation and slope stability evaluation of the landfill site. Grading recommendations and a Concept Plan for future uses of the landfill were also completed. The engineering analysis was submitted to MDE on January 3, 2005 for review and comment.

Comments and recommendations on the engineering analysis and conceptual design of the Coke Point Landfill were received from MDE on September 26, 2005. The recommendations were incorporated into the conceptual design and development of the landfill during 2006. An engineering services contractor was selected to provide detailed design and development of the landfill in 2006. It is planned in 2007 to proceed with the development and detailed design of a sediment and erosion control plan for the landfill to be submitted to the Baltimore County Soil Conservation district for approval.

5.0 Decree Management Reporting

Project Management

Project management at the Sparrows Point facility for the Consent Decree includes Mr. Robert Abate, project coordinator for the Consent Decree, and on-site personnel from Washington Group International retained to provide management support of the Consent Decree. URS Corporation has been selected as a subcontractor to support activities associated with Section V of the Consent Decree. Notification of the change in contractor and supporting documentation was provided in accordance with Section X on November 13, 2003.

Release Reporting

Appendix B contains spill reports for the facility that were reported in 2006. These reports document the status of mitigation of the releases, and the government oversight agency, contact name and telephone number.

APPENDIX A BOF SHOP ROOF MONITOR RECORDS

BOF Roof Monitor Visible Emission Report

Report Time Period Selection

 Beginning Date: Ending Date:

Date of Observation	Observed 6 Minute Value	Rolling 3-day Average	Observer
01/03/06	2.1	2.8	Kolb
01/04/06	0.0	2.5	Kolb
01/05/06	1.0	1.0	Kolb
01/10/06	7.9	3.0	Campeggi
01/11/06	1.7	3.5	Campeggi
01/13/06	1.9	3.8	Campeggi
01/17/06	4.8	2.8	Kolb
01/19/06	0.0	2.2	Kolb
01/20/06	2.5	2.4	Kolb
01/24/06	1.9	1.5	Campeggi
01/25/06	5.8	3.4	Campeggi
01/26/06	1.0	2.9	Campeggi
01/31/06	0.0	2.3	Kolb
02/01/06	2.5	1.2	Kolb
02/02/06	0.2	0.9	Kolb
02/07/06	0.0	0.9	Campeggi
02/08/06	0.0	0.1	Campeggi
02/09/06	0.0	0.0	Campeggi
02/14/06	1.7	0.6	Kolb
02/15/06	1.3	1.0	Kolb
02/16/06	4.0	2.3	Kolb
02/21/06	2.9	2.7	Kolb
02/22/06	5.8	4.2	Kolb
02/23/06	1.7	3.5	Kolb
02/27/06	8.1	5.2	Kolb
02/28/06	0.6	3.5	Campeggi
03/01/06	0.0	2.9	Kolb
03/06/06	0.4	0.3	Campeggi
03/07/06	1.7	0.7	Campeggi
03/08/06	0.0	0.7	Campeggi
03/14/06	3.8	1.8	Kolb
03/15/06	3.3	2.4	Kolb
03/16/06	7.3	4.8	Kolb

03/21/06	2.9	4.5	Campeggi
03/22/06	4.2	4.8	Campeggi
03/23/06	1.5	2.9	Campeggi
03/28/06	2.7	2.8	Kolb
03/29/06	0.8	1.7	Kolb
03/30/06	6.3	3.3	Kolb
04/04/06	1.7	2.9	Campeggi
04/05/06	1.5	3.2	Campeggi
04/07/06	1.5	1.6	Campeggi
04/11/06	1.7	1.6	Kolb
04/12/06	3.5	2.2	Kolb
04/13/06	2.9	2.7	Kolb
04/18/06	7.9	4.8	Campeggi
04/19/06	0.6	3.8	Campeggi
04/20/06	29.4	12.6	Janssen
04/26/06	1.3	10.4	Kolb
04/27/06	0.0	10.2	Kolb
04/28/06	4.2	1.8	Kolb
05/02/06	4.2	2.8	Campeggi
05/03/06	1.7	3.4	Campeggi
05/04/06	0.0	2.0	Campeggi
05/09/06	4.0	1.9	Kolb
05/10/06	1.9	2.0	Kolb
05/11/06	0.0	2.0	Kolb
05/16/06	2.7	1.5	Campeggi
05/17/06	1.5	1.4	Campeggi
05/18/06	1.9	2.0	Campeggi
05/23/06	6.7	3.4	Kolb
05/25/06	0.8	3.1	Kolb
05/26/06	0.6	2.7	Kolb
05/30/06	1.9	1.1	Campeggi
05/31/06	2.7	1.7	Campeggi
06/01/06	1.9	2.2	Campeggi
06/06/06	3.5	2.7	Kolb
06/07/06	0.0	1.8	Kolb
06/08/06	1.3	1.6	Kolb
06/13/06	0.0	0.4	Campeggi
06/14/06	3.3	1.5	Campeggi
06/15/06	1.9	1.7	Campeggi
06/20/06	0.0	1.7	Kolb
06/21/06	1.7	1.2	Kolb

06/22/06	1.5	1.1	Kolb
08/01/06	1.5	1.6	Kolb
08/02/06	0.0	1.0	Kolb
08/03/06	3.1	1.5	Kolb
08/08/06	1.0	1.4	Campeggi
08/09/06	5.8	3.3	Campeggi
08/10/06	6.5	4.4	Campeggi
08/15/06	0.0	4.1	Kolb
08/16/06	0.0	2.2	Kolb
08/17/06	8.8	2.9	Kolb
08/22/06	0.0	2.9	Kolb
08/23/06	17.5	8.8	Kolb
08/24/06	5.2	7.6	Campeggi
08/29/06	2.5	8.4	Kolb
08/30/06	0.6	2.8	Kolb
08/31/06	1.9	1.7	Kolb
09/05/06	2.1	1.5	Campeggi
09/06/06	0.0	1.3	Campeggi
09/07/06	0.0	0.7	Campeggi
09/11/06	3.1	1.0	Kolb
09/12/06	2.5	1.9	Kolb
09/15/06	0.0	1.9	Kolb
09/19/06	3.3	1.9	Campeggi
09/20/06	2.5	1.9	Campeggi
09/21/06	2.7	2.8	Campeggi
09/26/06	1.5	2.2	Kolb
09/27/06	3.5	2.6	Kolb
09/28/06	0.0	1.7	Kolb
10/03/06	0.8	1.4	Campeggi
10/04/06	1.3	0.7	Campeggi
10/05/06	4.6	2.2	Campeggi
10/10/06	3.5	3.1	Kolb
10/11/06	2.5	3.5	Kolb
10/12/06	3.5	3.2	Kolb
10/17/06	2.9	3.0	Campeggi
10/18/06	0.0	2.1	Campeggi
10/19/06	1.3	1.4	Campeggi
10/23/06	1.9	1.1	Kolb
10/27/06	0.6	1.3	Kolb
10/31/06	0.0	0.8	Campeggi
11/01/06	0.4	0.3	Campeggi

11/02/06	0.0	0.1	Campeggi
11/07/06	1.3	0.6	Kolb
11/08/06	1.3	0.9	Kolb
11/09/06	1.5	1.4	Campeggi
11/13/06	0.0	0.9	Campeggi
11/17/06	0.2	0.6	Campeggi
11/21/06	2.1	0.8	Kolb
11/22/06	0.0	0.8	Kolb
11/27/06	0.0	0.7	Campeggi
12/01/06	0.0	0.0	Campeggi
12/05/06	3.8	1.3	Kolb
12/06/06	0.0	1.3	Kolb
12/07/06	0.0	1.3	Kolb
12/12/06	0.4	0.1	Campeggi
12/13/06	1.9	0.8	Campeggi
12/15/06	0.0	0.8	Kolb
12/18/06	0.0	0.6	Kolb
12/22/06	2.5	0.8	Kolb
12/27/06	1.5	1.3	Campeggi
12/28/06	3.8	2.6	Campeggi
12/29/06	5.0	3.4	Campeggi

APPENDIX B RELEASE REPORTING RECORDS



**ISG Sparrows Point LLC.
5111 North Point Boulevard
Baltimore, Maryland 21219**

May 31, 2006

CERTIFIED RETURN RECEIPT REQUESTED

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

Dear Mr. Sonberg:

This letter, and its attachment, will serve as the monthly spill report for ISG Sparrows Point LLC. for the month of April 2006. 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,

Robert J. Abate
Manager Safety, Health, and Environment

Attachment

cc: M. S. Vogler
SPCC Book
EPA OPA Book
ISO14000 CFT Members

Mr. Greg Sonberg - May 31, 2006

Date and Time - April 13, 2006 at approximately 1131 hours

Amount - Approximately 10 gallons

Spilled To - Ground only

Material Spilled - Diesel Fuel

Location - L Blast Furnace South Side

On April 13, 2006, at approximately 1131 hours, a spill of approximately ten gallons of diesel fuel occurred at the south side of L Blast Furnace. The fuel was spilled to the ground and none entered any sewer or waterway. Our investigation revealed that the spill occurred when a Euclid dump truck was struck by a submarine car and the dump truck's fuel tank was ruptured.

At the time of the spill the Euclid was parked near the railroad tracks, which are used to spot submarine cars beneath the furnace, to assist in a grounds cleanup that was underway. While the dump truck was parked, the submarine car was pulled from beneath the furnace by the automatic cable and pulley setup and struck the dump truck breaking open the truck's fuel tank near its top. The truck was then dragged several feet before operators noticed the collision and tuned the automatic pulley off.

Railroad, Mobile Equipment, and Environmental personnel were immediately called to the scene to assess the situation and take corrective measures. It was found that the top of the truck's fuel tank had been cut open by the submarine car and approximately ten gallons of fuel had leaked out and onto the ground. An epoxy putty was placed over the gash in the fuel tank to prevent any further leakage and absorbent pads were placed beneath the truck and on the spilled fuel. The truck and the submarine car were then separated. The submarine car was returned to service and the truck was sent to the repair shop. No additional fuel leaked during this operation.

Cleanup consisted of removing the contaminated soil using a bobcat, a grade all, and hand tools. The contaminated soil and absorbent was stabilized with kiln dust and then disposed.

To prevent a recurrence our Mobile Equipment and Blast Furnace personnel have modified their procedures for cleanup at the bottom of the furnace area.



**ISG Sparrows Point LLC.
5111 North Point Boulevard
Baltimore, Maryland 21219**

November 21, 2006

CERTIFIED RETURN RECEIPT REQUESTED

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

Dear Mr. Sonberg:

This letter and its attachment will serve as the spill report for ISG Sparrows Point LLC. for October 2006. There was only one spill during the month and it occurred on October 28, 2006.

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

Sincerely,

Robert J. Abate
Manager Safety, Health, and Environment

Attachment

cc: EPA OPA Book
ISO14000 CFT Members

Mr. Greg Sonberg – November 21, 2006

Date and Time – October 28, 2006 discovered at approximately 1100 hours
Amount – approximately 500 gallons
Spilled To – Ground
Material Spilled – Mobil 630 Lubrication Oil
Location – Sinter Plant southwest corner

On October 28, 2006, during his rounds, the Sinter Plant Operating Foreman discovered a spill of an estimated 500 gallons of Mobil 630 lubrication oil on the ground in the southwest corner of the Sinter Plant area. None of the material entered any sewer or waterway.

Since the spill was controlled and there was no visible flow observed the foreman called the environmental duty officer, made the initial spill report, and then began the investigation to determine the source and cause of the spill. The duty officer made arrangements for Mobile Dredging and Pumping to send equipment and men to the scene to do the cleanup and Mobile Dredging completed the cleanup that day. The recovered oil and contaminated soil was taken to our on site oil recovery contractor Kroff Material Processing. The oil was to be recycled and the soil was to be stabilized and disposed of at our on site landfill.

Our investigation revealed the following. The oil is stored in a 500 gallon capacity minibulk tank located on the ground level at the southwest corner of the sinter plant. The spilled oil originated from a hose located on the fourth floor of the sinter plant building. Oil from the tank is conveyed to the fourth floor by metal piping which begins at the tank and terminates at a hose equipped with a shut off valve. The oil is conveyed upward by introducing air pressure into the system. A minimum of three valves must be opened to allow oil to flow from the hose and all the necessary valves were found to be in the open position by the shift foreman. The valves were then closed. The system was then tested and all valves were observed to be holding in the closed position and, therefore, we believe that the system was not at fault.

To prevent a recurrence we are installing a lock on the air valve and only those who have a need to operate the system will be given the means to open the lock. Without air pressure the oil will not flow from the tank. Additionally, everyone who uses the system will be made aware of the incident and the actions taken to prevent a recurrence. Further, other mills within the facility will also be contacted to determine if a similar incident could occur there and, if so, further preventative actions will be taken.



**ISG Sparrows Point LLC.
5111 North Point Boulevard
Baltimore, Maryland 21219**

December 18, 2006

CERTIFIED RETURN RECEIPT REQUESTED

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

Dear Mr. Sonberg:

This letter and its attachment will serve as the spill report for ISG Sparrows Point LLC. for November 2006. There was only one spill during the month and it occurred on November 8, 2006.

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

Sincerely,

Robert J. Abate
Manager Safety, Health, and Environment

Attachment

cc: EPA OPA Book
ISO14000 CFT Members

Mr. Greg Sonberg – December 18, 2006

Date and Time – November 8, 2006 discovered at approximately 1250 hours
Amount – approximately 30 gallons
Spilled To – Ground
Material Spilled – Hydraulic oil
Location – Sinter Plant north gas cleaning fan

On November 8, 2006, at approximately 1250 hours, a spill of approximately 30 gallons of hydraulic oil was discovered on the ground at the base of the north gas cleaning fan in the Sinter Plant. All of the oil was contained on the ground and none entered any sewer or waterway.

When the spill was discovered the north gas cleaning fan was shut down to stop the source of the leak and containment actions were initiated. Mobile Dredging was contacted to do the spill cleanup and completed it the same day. Recovered oil was taken to Kroff Materials Processing for recycling. The contaminated soil was removed, stabilized with kiln dust, and placed in our onsite landfill.

When the north gas cleaning fan was inspected we found a ruptured oil hose that was determined to be the cause of the spill. That hose was replaced and the unit the unit was restarted. An inspection revealed that the repair was successful and the fan was returned to service at approximately 1625 hours.

The details of this incident will be shared with all oil handling personnel in the plant.

