

**ISG Sparrows Point**

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# **Multimedia Consent Decree**

## **2004 Annual Report**

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**FEB 1 2005**

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

Prepared by  
**ISG Sparrows Point**



**February 2005**

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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. ISG Sparrows Point Division is currently operating the Sparrows Point facility in Baltimore County, Maryland (the "Facility" as defined by the Consent Decree) and 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 2004 that complies 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 Inc. 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 2004 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 2004 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 that are required on a tri-annual basis (Section VI 3.c.). The next update will be provided in April of 2005.

2004 Expenditures:     \$0

### Tin Mill Canal Discharge Report

This report was reviewed, finalized, and submitted in July 1998. No further action is required on this item.

## **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 2004 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 2<sup>nd</sup> to 4<sup>th</sup> 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.

Facility engineering is now developing a full-scale design and plans for capital appropriation of the required equipment. It is anticipated that installation of recycle equipment and operation will be initiated in 2006 and completed by 2007.

**2004 Expenditures:**      \$0

## **Recycling of BOF Fume Sludge**

### **Description of 2004 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 sporadically utilized in 2004 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 309 tons of RS were recycled for the year. Current operational practices do not require RS type materials for coolant. The current practice is projected to continue in 2005. At such point when the BOF operational practices require RS coolant, recycling will be reestablished

**2004 Expenditures:**      \$2,500

## **Recycling of Humphreys Creek Wastewater Treatment Plant Sludge**

### **Description of 2004 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. Current plans for 2005 include pilot testing of a recovery unit on-site that will remove oil from the sludge to permit recycling of the solids in the Sinter Plant. The projected program will evaluate performance and cost feasibility of this recycling process.

**2004 Expenditures:** \$0

## **Maintenance Dredging of the Tin Mill Canal**

### **Description of 2004 Activity:**

Maintenance dredging operations were conducted in late 2003 that included the removal of approximately 500 cubic yards of material from a location in Tin Mill Canal near the sewer outlet of the Hot Strip Mill. The Sludge Drainage Pad was used for temporary storage and dewatering of the material. Testing procedures for this material were completed in 2004 prior to disposal to provide waste characterization of the materials. Sampling procedures included the recovery of discrete random and composite samples of the waste materials. Toxicity characteristic leaching procedure analyses were completed for the recovered samples that documented that the waste materials were non-hazardous (included in Appendix A). The waste materials have been disposed of at Greys Landfill.

**2004 Expenditures:** \$7,500

## **Facility Wide Waste Minimization Plan**

ISG will continue to implement the Facility Wide Waste Minimization Plan. The goal of this plan 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.

The Plan submitted in 1999 included both waste minimization projects associated with the Consent Decree as well as numerous voluntary waste minimization programs. Major components of this plan were completed prior to 2001. As required by the Decree, a triannual review and assessment of the effectiveness of this plan was conducted in 2002. The review report was submitted to the agencies on April 10, 2002. A triannual review of the plan will be submitted in April 2005.

Goals and effectiveness of the Waste Minimization Program at Sparrows Point will continued 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.

## 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 2004, ISG Sparrows Point Inc. 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
- Semi-annual sampling and analysis of groundwater.

Specifics of the interim measures tasks completed in 2004 are as follows:

- Institutional controls were maintained at the former sludge bin storage area to minimize and manage activities that could disturb soils at the site. These controls consist of notice sign boundary markers and continuation of an authorization program to conduct work in the area.
- Operation and maintenance of the groundwater recovery wells, transfer pipeline and treatment process equipment located at the existing wastewater treatment facility.
- Evaluation of the groundwater pump and treat system, including documentation of treatment flow, review of semi-annual groundwater elevation data, and review of effectiveness.
- Semi-annual sampling, analysis and evaluation of the groundwater impacted by former operations at the sludge bin storage area.

A total of 3,134,352 gallons of water were extracted from the two Former Sludge Bin Storage Area groundwater pumping wells (RW15-PZM020 and RW10-PZM020) during 2004. The average pumping rate for the pump and treat system for 2004 was 8,587 gpd, or 6.0 gallons per minute (gpm). A total of 220 pounds (lbs) of cadmium and 10,178 lbs of zinc was removed and treated from groundwater recovered from the Rod & Wire Mill area in 2004.

Groundwater elevation data indicate groundwater drawdown within a radius of influence that effectively 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 3 gallons per minute for each recovery well. The groundwater elevation data for

the shallow zone (groundwater table surface to 15 feet in depth) also document water table drawdown that is effectively controlling contamination 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.

Groundwater monitoring data collected during 2004 did not indicate significant overall changes in groundwater quality as compared to 2003.

The Proposed Operating Plan for 2005 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 2004 included the following activities:

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

Work completed in 2004 for the Nature & Extent Work Plan included the following major events:

2/24/2004	Meeting held with agencies to review status of Nature & Extent work completed prior to ISG purchase of site and proposed steps forward
3/12/2004	Submission of addendum to Nature & Extent Work Plan for agency approval
4/13/2004	Agency approval received for work plan modifications
5-7/2004	Completion of groundwater sampling and analysis program
9/2/2004	Presentation to agencies of preliminary results of the groundwater Nature & Extent program
10-12/2004	Data review and compilation of Nature & Extent Report for submittal to agencies

Work has proceeded to complete the Nature & Extent Work Plan for the Site Wide Investigation. The final report will be submitted to the agencies early in 2005. At that point, it is anticipated that a review meeting will be held to discuss next steps for the Site Wide Investigation.

### Human Health Environmental Indicator Program

As part of a cooperative effort with the agencies, ISG Sparrows Point has undertaken a program to assess current human health exposures at the facility with respect to the requirements outlined in RCRA Corrective Action Environmental Indicator RCRIS Code (CA 725). Work completed in 2004 associated with this program included the following:

- A conference call was held on June 3, 2004 between ISG and the agencies to discuss the CA 725 program requirements. It was agreed that ISG would prepare a draft version of the CA 725 form to be submitted for agency review.



- The draft CA 725 form was submitted on August 17, 2004. This correspondence also included a summary document of the data collection strategy for the CA 725 human health assessment tasks.
- A meeting was held with the agencies on September 2, 2004 that was held to review the draft CA 725 form and associated data collection strategy.
- Based upon input from the September 2 meeting, a Workplan to Evaluate Current Human Exposures was developed and submitted for approval on October 28, 2004.
- Preliminary approval was granted by the agencies in a conference call held December 15, 2004 to review the submitted Workplan. A follow-up letter was provided by the agencies confirming the approval on January 11, 2005.

ISG is now implementing the approved Workplan to Evaluate Current Human Exposures and will work with the agencies in 2005 to finalize data and reporting requirements of the Workplan and the CA 725 process.

## 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 2004 have been attached in Appendix B. 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 2004 for the landfill were as follows:

Greys Landfill

Revised closure plans, project specifications and project engineering drawings for Greys Landfill were submitted by ISG Sparrows Point Inc. to MDE for review and approval on October 10, 2003. Conditional approval with comment was received from MDE for the planned Greys Landfill improvements on March 1, 2004. The improvements at Greys are scheduled to begin in the late March or April of 2005.

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. Upon review and approval, detail engineering plans for continued use of the Coke Point Landfill, included appropriate stormwater and erosion and sediment controls will be finalized.

## **5.0 Decree Management Reporting**

### **Project Management**

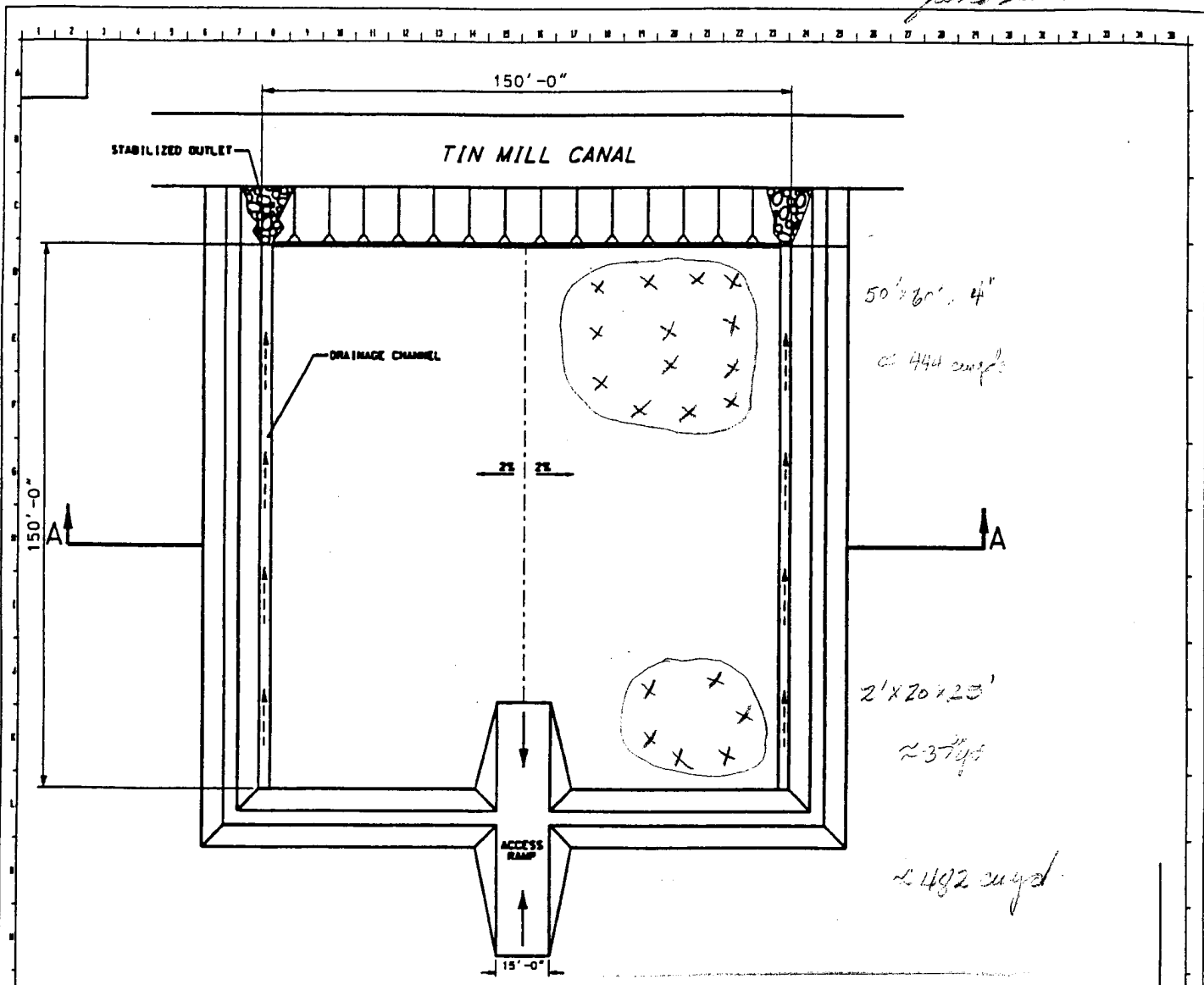
ISG has reorganized the management structure for the Consent Decree to provide project management at the Sparrows Point facility. As of 2003, Mr. Robert Abate is the project coordinator for the Consent Decree. Personnel for Washington Group International have been retained to provide on-site management support of the Consent Decree. URS Corporation has been selected as a subcontractor to support activities associated 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**

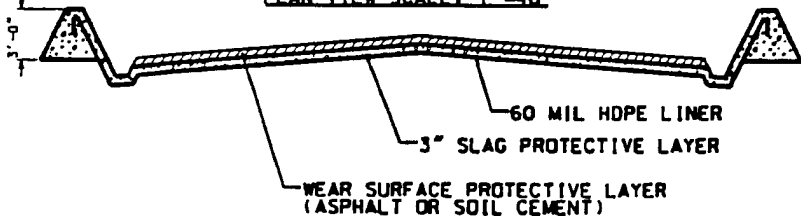
Appendix C contains spill reports for the facility that were reported in 2004. These reports document the status of mitigation of the releases, and the government oversight agency, contact name and telephone number.

**APPENDIX A      MAINTENANCE DREDGING ANALYTICAL  
RESULTS**


*Gene Land*





PLAN VIEW SCALE: 1"=40'



**SECTION A-A**

AREA CODE:		F.I. NUMBER:	
DISK NO.:	FILE NAME:	SCALE FACTOR:	
REVISION		BETHLEHEM STEEL CORPORATION	
5	DATE	INITIAL	DEPT
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
DRAWN BY:		SPARROWS POINT DIVISION	
CHECKED BY:		SCALE:	DRAWING NUMBER:
APPROVED BY:			

DATE	REVISION	CHK'D	DATE	APP'D
ENGINEER				
STATE REG NO				
				
				

OPER DRG NO.	REFERENCE

DRAINAGE CHANDEL







**APPENDIX B      BOF SHOP ROOF MONITOR RECORDS**

# BOF Roof Monitor Visible Emission Report

Report Time Period Selection

Beginning Date:

January

2004

Ending Date:

December

2004

Date of Observation	Observed 6 Minute Value	Rolling 3-day Average	Observer
01/02/04	4.6	3.2	Campeggi
01/06/04	2.3	2.8	Campeggi
01/07/04	1.9	2.9	Campeggi
01/08/04	1.3	1.8	Campeggi
01/13/04	4.6	2.6	Kolb
01/14/04	4.0	3.3	Kolb
01/15/04	1.7	3.4	Kolb
01/20/04	4.2	3.3	Campeggi
01/21/04	4.8	3.6	Frushour
01/22/04	0.6	3.2	Campeggi
01/27/04	3.1	2.8	Kolb
01/28/04	4.2	2.6	Kolb
01/29/04	3.5	3.6	Kolb
02/03/04	1.5	3.1	Campeggi
02/04/04	1.7	2.2	Campeggi
02/05/04	1.5	1.6	Campeggi
02/10/04	0.2	1.1	Kolb
02/11/04	4.2	2.0	Kolb
02/13/04	0.6	1.7	Kolb
02/17/04	1.9	2.2	Campeggi
02/18/04	3.5	2.0	Campeggi
02/19/04	1.9	2.4	Campeggi
02/24/04	1.9	2.4	Kolb
02/25/04	7.5	3.8	Kolb
02/26/04	1.7	3.7	Kolb
03/02/04	3.1	4.1	Campeggi
03/03/04	6.3	3.7	Campeggi
03/04/04	1.0	3.5	Campeggi
03/09/04	2.9	3.4	Kolb
03/10/04	4.0	2.6	Kolb
03/11/04	7.9	4.9	Kolb
03/16/04	2.9	4.9	Campeggi

03/17/04	0.0	3.6	Campeggi
03/19/04	0.2	1.0	Campeggi
03/23/04	0.8	0.3	Kolb
03/24/04	4.8	1.9	Kolb
03/25/04	5.8	3.8	Kolb
03/30/04	1.9	4.2	Campeggi
03/31/04	0.6	2.8	Campeggi
04/01/04	8.1	3.5	Campeggi
04/06/04	9.0	5.9	Kolb
04/07/04	3.1	6.7	Kolb
04/08/04	0.0	4.0	Kolb
04/13/04	2.7	1.9	Campeggi
04/14/04	2.3	1.7	Campeggi
04/15/04	4.6	3.2	Campeggi
04/20/04	1.7	2.9	Kolb
04/21/04	1.5	2.6	Kolb
04/22/04	1.0	1.4	Kolb
04/27/04	0.6	1.0	Campeggi
04/28/04	0.4	0.7	Campeggi
04/30/04	1.3	0.8	Campeggi
05/04/04	5.8	2.5	Kolb
05/05/04	2.9	3.3	Kolb
05/06/04	3.5	4.1	Kolb
05/11/04	1.9	2.8	Campeggi
05/12/04	0.4	1.9	Campeggi
05/13/04	0.0	0.8	Campeggi
05/18/04	0.4	0.3	Kolb
05/19/04	3.3	1.2	Kolb
05/20/04	2.7	2.1	Kolb
05/25/04	8.8	4.9	Bonanno
05/26/04	11.3	7.6	Bonanno
05/27/04	0.0	6.7	Bonanno
06/01/04	6.9	6.1	Kolb
06/02/04	4.0	3.6	Kolb
06/03/04	5.8	5.6	Kolb
06/08/04	11.5	7.1	Kolb
06/09/04	1.3	6.2	Campeggi
06/10/04	0.8	4.5	Campeggi
06/14/04	3.5	1.9	Kolb
06/15/04	1.0	1.8	Kolb
06/22/04	3.3	2.6	Campeggi

06/23/04	8.8	4.4	Campeggi
06/24/04	2.7	4.9	Campeggi
06/25/04	5.2	5.6	Campeggi
06/29/04	4.0	4.0	Kolb
06/30/04	1.7	3.6	Kolb
07/01/04	6.5	4.1	Kolb
07/06/04	1.9	3.4	Campeggi
07/07/04	17.5	8.6	Thompson
07/08/04	6.0	8.5	Campeggi
07/13/04	3.1	8.9	Kolb
07/15/04	5.0	4.7	Kolb
07/16/04	5.6	4.6	Kolb
07/20/04	1.7	4.1	Campeggi
07/21/04	2.1	3.1	Campeggi
07/22/04	1.0	1.6	Campeggi
07/27/04	0.8	1.3	Kolb
07/28/04	3.8	1.9	Kolb
07/29/04	1.7	2.1	Kolb
08/03/04	2.1	2.5	Campeggi
08/04/04	1.5	1.8	Campeggi
08/05/04	2.3	2.0	Campeggi
08/10/04	0.6	1.5	Kolb
08/11/04	2.1	1.7	Kolb
08/12/04	6.7	3.1	Kolb
08/17/04	2.3	3.7	Campeggi
08/18/04	3.1	4.0	Campeggi
08/19/04	1.5	2.3	Campeggi
08/24/04	9.0	4.5	Kolb
08/25/04	1.9	4.1	Kolb
08/26/04	6.5	5.8	Kolb
08/30/04	0.0	2.8	Campeggi
09/02/04	0.6	2.4	Campeggi
09/03/04	2.7	1.1	Campeggi
09/08/04	1.5	1.6	Kolb
09/09/04	1.9	2.0	Kolb
09/10/04	5.6	3.0	Kolb
09/14/04	2.1	3.2	Campeggi
09/15/04	7.5	5.1	Campeggi
09/16/04	4.0	4.5	Campeggi
09/21/04	1.7	4.4	Kolb
09/22/04	1.5	2.4	Kolb

09/23/04	2.3	1.8	Kolb
09/29/04	2.3	2.0	Campeggi
09/30/04	14.0	6.2	Campeggi
10/01/04	4.4	6.9	Campeggi
10/05/04	6.7	8.4	Kolb
10/06/04	0.8	4.0	Kolb
10/07/04	0.4	2.6	Kolb
10/11/04	2.3	1.2	Campeggi
10/12/04	0.4	1.0	Campeggi
10/19/04	25.8	9.5	Kolb
10/20/04	7.7	11.3	Kolb
10/21/04	0.0	11.2	Kolb
10/22/04	0.8	2.8	Kolb
10/26/04	0.6	0.5	Campeggi
10/27/04	3.3	1.6	Campeggi
10/28/04	0.0	1.3	Campeggi
11/02/04	3.5	2.3	Kolb
11/03/04	0.0	1.2	Kolb
11/04/04	5.2	2.9	Kolb
11/09/04	1.3	2.2	Campeggi
11/10/04	7.7	4.7	Campeggi
11/11/04	4.4	4.5	Campeggi
11/16/04	0.4	4.2	Lang
11/17/04	1.5	2.1	Kolb
11/18/04	3.3	1.7	Kolb
11/22/04	2.9	2.6	Kolb
11/23/04	3.5	3.2	Campeggi
11/24/04	3.1	3.2	Campeggi
11/30/04	5.2	3.9	Kolb
12/02/04	0.0	2.8	Kolb
12/03/04	4.4	3.2	Campeggi
12/07/04	1.3	1.9	Campeggi
12/08/04	5.6	3.8	Campeggi
12/09/04	4.4	3.8	Campeggi
12/14/04	14.0	8.0	Kolb
12/15/04	4.4	7.6	Kolb
12/16/04	5.8	8.1	Kolb
12/21/04	1.3	3.8	Campeggi
12/22/04	0.4	2.5	Campeggi
12/23/04	2.9	1.5	Campeggi
12/27/04	2.3	1.9	Kolb

12/28/04

0.0

1.7

Kolb

**APPENDIX C      RELEASE REPORTING RECORDS**



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

**April 26, 2004**

**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 attachments will serve as the spill report for ISG Sparrows Point LLC. for the First Quarter of 2004.

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

Attachments

cc: M. S. Vogler  
SPCC Book  
EPA OPA Book





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

February 23, 2004

**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:

On February 11, 2004 at approximately 1145 hours a spill of 20 to 25 gallons of hydraulic oil was observed at our Sinter Plant. None of the material entered any plant sewers or waterways.

Our investigation revealed that at the time of the spill mechanics were operating an oil cleaning machine to separate water from the hydraulic oil system that services the north windbox fan motor at our Sinter Plant. This machine was bought specifically for this job and this was the first time it was used. The mechanics believed that only clean water would exit the machine and did not make an effort to contain the material exiting the cleaning machine. However, when the machine was started they observed that an emulsion was leaving the machine and quickly shut the machine down.

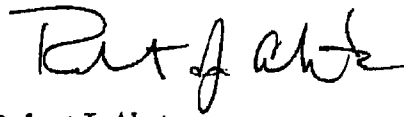
The spilled oil was diked with speedi-dry to prevent it from flowing further and Onyx Precision Services was called to do the clean up. Onyx used a vacuum truck and sorbent material to remove the standing oil and contaminated soil. The soiled pads and contaminated soil were placed into a dumpster box and were disposed of at an approved offsite landfill.

To prevent a recurrence this incident was discussed with the mechanics who did the work and with others who might do the work in the future. Procedures have been put into place that will require the material exiting the machine to be placed into a suitable container, such as a drum or portable tank, so that at the completion of the job the emulsion can be properly recycled.

Mr. Greg Sonberg - February 23, 2004

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

Sincerely,

A handwritten signature in black ink, appearing to read "R. J. Abate". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Robert J. Abate  
Manager Safety, Health, and Environment

cc: M. S. Vogler  
SPCC Book  
EPA OPA Book



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

**February 23, 2004**

**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:

On February 14, 2004 at approximately 0900 hours a spill of approximately 20 gallons of hydraulic oil was observed at our Sinter Plant. None of the material entered any plant sewers or waterways.

Our investigation revealed that at the time of the spill mechanics were replacing bearings on the north windbox fan at our Sinter Plant. The job had been completed and the hydraulic oil pump was started to test the repair. Immediately it was noticed that the bearing cap was leaking oil and the hydraulic pump was promptly shut down. The bearing cap was examined and it was found that an oil drain plug had not been installed prior to installation of the cap. This bearing cap was of a newer design than the one it replaced. The old bearing cap did not have a drain plug.

The oil was contained using speedi-dry and Onyx Precision Services was called to do the cleanup. Onyx used sorbent pads and a vacuum truck to remove the standing oil and contaminated soil. The cleanup materials were deposited into a dumpster box and were ultimately disposed of at an approved offsite landfill.

To prevent a recurrence all mechanics that do this type of work were apprised of the spill and of the proper way to install the new bearing caps.

Mr. Greg Sonberg - February 23, 2004

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

Sincerely,

A handwritten signature in black ink, appearing to read "Robert J. Abate". The signature is fluid and cursive, with a prominent initial "R" and a long, sweeping underline.

Robert J. Abate  
Manager Safety, Health, and Environment

cc: M. S. Vogler  
SPCC Book  
EPA OPA Book

**ISG**

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

**July 26, 2004**

**CERTIFIED RETURN RECEIPT REQUESTED**

Mr. Horacio Tablada  
Maryland Department of the Environment  
Waste Management Administration  
1800 Washington Boulevard Suite 610  
Baltimore, Maryland 21230-1708

Dear Mr. Tablada:

This letter and its attachments will serve as the spill report for ISG Sparrows Point LLC. for the Second Quarter of 2004. There were three spill reported during the quarter.

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

cc: M. S. Vogler  
SPCC Book  
EPA OPA Book

Attachment 1

**Date/Time – 6/1/04 approximately 1130 hours**

**Amount - Unknown**

**Spilled To - Ground**

**Material Spilled – Diesel Fuel**

**Location – Plant Garage**

On June 1, 2004, after an underground line test, a leaking underground diesel fuel supply line was verified at our Plant Garage. The test was made in response to indications we received from the Red Jacket leak detector installed on the supply tanks.

Upon confirmation of the leak the two tanks supplying the underground line were removed from service and the Department was notified of the leak. To ensure that the system was not used we shut off electrical power to the pumps and dispenser, closed the ball valves on the tanks, tagged out the dispenser, and locked the nozzle.

The firm of Petroleum Management and Recovery was hired to dig up the leaking line and remove it entirely from the ground, along with the dispenser, and remediate the contamination. Petroleum Services was also hired to install a new dispenser, pump island, and above ground piping to connect to the existing two diesel fuel storage tanks. We are currently awaiting delivery of the dispenser and its appurtenances.

Mr. Mike Frank, of the Department inspected the site on 6/24/04 to observe the remediation work. Mr. Frank required that soil sampling be done before the excavation was closed and a closure report be submitted to him containing the sampling results and soil disposal manifests. Petroleum Management and Remediation is compiling that report and we expect to send it to you shortly.



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

June 28, 2004

**CERTIFIED RETURN RECEIPT REQUESTED**

Mr. Jonas Jacobson  
Maryland Department of the Environment  
Hazardous and Solid Waste Administration  
1800 Washington Boulevard Suite 610  
Baltimore, Maryland 21230-1708

Dear Mr. Jacobson:

On June 4, 2004, at approximately 1200 hours oil was discovered in Outfall 017 containment basin during a routine outfall inspection. The majority of the oil was contained behind the many oil capture devices installed in the outfall containment basin; however, a small amount of sheen was observed escaping into Jones Creek.

Plant environmental personnel were notified and they called A2Z Environmental and Mobile Dredging and Pumping to begin cleanup. A2Z installed harbor boom at the exit of the containment basin as well as supplying vacuum tanker services and Mobile Dredging also supplied vacuum service. Regulatory agencies were also notified of the incident.

Simultaneously, other plant environmental personnel investigated the source of the oil. It was found that a process sewer line that flowed into our wastewater treatment plant had become partially blocked and had forced process water to overflow a diversion baffle into a storm sewer leading to Outfall 017. Large pumps were brought to the diversion baffle area and pumped the process water to a process water sewer box that was down stream of the blocked section of sewer. Contributors to the blocked sewer line were identified and flow was reduced as much as possible. These two actions stopped the flow of process water to Outfall 017. The pumps remained in operation until the blockage was cleared.

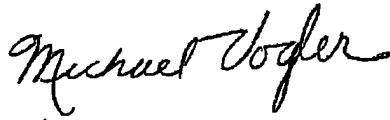
The United States Coast Guard, MSO Baltimore, responded to the Outfall on June 4 and was pleased with the response effort. The cleanup effort continued until the last oil was removed from the containment basin. The Coast Guard conducted a subsequent visit to the area on June 8 and they declared the cleanup complete.

Mr. Jonas Jacobson - June 28, 2004

To prevent a recurrence, the diversion baffle in the sewer box has been raised an additional eighteen inches. Additionally, the affected branch sewer line and the main line into which it feeds have been cleaned and flow has been restored.

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

Sincerely,

  
for  
Robert J. Abate  
Manager Safety, Health, and Environment

cc: M. S. Vogler  
SPCC Book  
EPA OPA Book





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

June 11, 2004

**CERTIFIED RETURN RECEIPT REQUESTED**

Mr. Jonas Jacobson  
Maryland Department of the Environment  
Hazardous and Solid Waste Administration  
1800 Washington Boulevard Suite 610  
Baltimore, Maryland 21230-1708

Dear Mr. Jacobson:

On June 2, 2004, at approximately 1800 hours, an oil spill occurred at Outfall 001. Investigation revealed approximately 150 to 200 gallons of lubricating oil spilled to the outfall.

Our investigation revealed the following. On June 2, 2004 maintenance forces had completed a scheduled outage and started up the No. 1B Induced Draft Fan at Pennwood Power Plant and placed it into service. At approximately 1800 hours operating personnel received a low pressure alarm for the lubricating system at No. 1B Induced Draft Fan. The alarm was investigated and it was found that there was a loss of oil from the lubrication system. The fan was then immediately shut down and secured. Standard procedure is then to check the outfall for evidence of oil contamination. The check of the outfall revealed that there was oil at the outfall and it was contained behind the permanent harbor boom installed there.

Plant environmental personnel were called to the scene and arranged for cleanup operations to begin. A2Z Environmental forces were called in to begin cleanup. They deployed vacuum equipment, a boat, sorbent material, and personnel to operate the equipment. Environmental personnel also made the necessary calls to regulatory agencies and the Coast Guard responded to the scene. At that time, the Coast Guard was pleased with the response activities and reported that they would return in the morning to monitor progress. A2Z worked into the evening and removed the bulk of the oil behind the boom. Prior to leaving they deployed a sorbent sweep in front of the harbor boom to absorb any remaining oil left in the outfall.

The following morning, June 3, 2004, the Coast Guard returned to the scene. The outfall was clean except for some sheen behind the harbor boom and some sheen that had

Mr. Jonas Jacobson – June 11, 2004

passed under the boom and was lingering in the vicinity of the outfall. The Coast Guard requested that the sorbent material installed the previous night be removed and replaced and that additional sorbent material be placed outside of the boom to aid in recovery of the sheen. A2Z did this shortly thereafter.

The outfall was inspected on June 4, 2004 and some sheen was found eddying in the approach to the outfall. The sorbent material was changed out and A2Z was requested to inspect the outfall on June 5, 2004 and change out the sorbent again if necessary. Fresh sorbent material was kept in the outfall for several more days as a precaution.

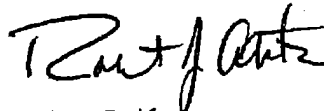
The spill was caused by a failure of the No. 1 B Oil Cooler. Initial inspection of the defective cooler revealed failed tube bundle seal rings and these were replaced. Subsequent testing of the cooler revealed that it still leaked and it was immediately secured. It is suspected that a tube may be cracked. The cooler will remain out of service until it is positively determined what caused the failure and repairs are made.

In an effort to prevent a recurrence the following steps are being taken.

- The Planned Job Procedure (PJP) for the oil coolers is being revised to include the replacement of the seal rings on an annual basis.
- The revised PJP will be reviewed with all maintenance personnel
- The startup procedure for the oil coolers will be reviewed and changes will be made if deemed necessary.

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

Attachments

cc: M. S. Vogler  
R. P. Belbot  
W. O'Hern  
SPCC Book  
EPA OPA Book



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

**October 27, 2004**

**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 will serve as the spill report for ISG Sparrows Point LLC. for the Third Quarter of 2004. There were no spills during the quarter.

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

cc: M. S. Vogler  
SPCC Book  
EPA OPA Book



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

**January 5, 2005**

**CERTIFIED RETURN RECEIPT REQUESTED**

Mr. Horacio Tablada  
Maryland Department of the Environment  
Waste Management Administration  
1800 Washington Boulevard Suite 610  
Baltimore, Maryland 21230-1708

Dear Mr. Tablada:

This letter and will serve as the spill report for ISG Sparrows Point LLC. for the Fourth Quarter of 2004. There was one spill during the quarter and the report is attached.

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

cc: M. S. Vogler  
SPCC Book  
EPA OPA Book



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

December 15, 2004

**CERTIFIED RETURN RECEIPT REQUESTED**

Mr. Horacio Tablada  
Maryland Department of the Environment  
Waste Management Administration  
1800 Washington Boulevard Suite 610  
Baltimore, Maryland 21230-1708

Dear Mr. Tablada:

On December 6, 2004, at approximately 0400 hours a spill of about 50 gallons of hydraulic oil occurred at Truck Dock 193A outside of our New Cold Mill. All of the oil was contained on land and none entered any sewer or waterway.

Our investigation revealed that a hydraulic hose, on a Dino-truck used to haul scrap boxes, had burst. The oil flowed across a paved area and onto the surrounding soil. When the spill was discovered the truck was taken out of service and transported to our repair shop. Environmental personnel were notified of the incident and summoned A&A Environmental to do the cleanup. A&A cleaned the pavement and removed the contaminated soil. The dino truck was inspected, repaired, and tested before it was allowed to return to service.

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

cc: M. S. Vogler  
SPCC Book

EPA OPA Book