
WEAVER

BOOS

CONSULTANTS

October 1, 2014

Ms. Barbara Brown
Environmental Restoration and Redevelopment Program
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, MD 21230

**Re: Phase I Environmental Site Assessment Letter
Development Area A**

Dear Ms. Brown:

In accordance with the Administrative Consent Order (ACO) executed by and between The State of Maryland, Department of the Environment (MDE) and Sparrows Point Terminal, LLC (SPT) on September 12, 2014, SPT has designated a certain area of the property identified as the Former RG Steel Facility located at 1430 Sparrows Point Boulevard and 5111 North Point Boulevard in Sparrows Point, Maryland (the "Site") for investigation, remediation and/or development on a priority basis. This area has been designated as "Area A" as transmitted within the Voluntary Action Program (VCP) Application submitted on September 12, 2014. Area A totals approximately 789 acres and has been depicted within a Geographic Information System (GIS) compatible figure that has been attached to this correspondence as **Figure 1**. Per your request, Weaver Boos has prepared the following summary of the Findings and Recognized Environmental Conditions identified within Area A as part of the Phase I Environmental Site Assessment (ESA) completed at the Site on behalf of SPT.

As part of due diligence activities implemented by SPT, Weaver Boos Consultants, LLC (Weaver Boos) completed a Phase I ESA for the Sparrows Point Property dated May 19, 2014 in accordance with ASTM E 1527-13 (the newly updated ASTM Standard). The Phase I ESA was completed for the entire Site inclusive of Area A. In general, given the size of the Site, the findings identified during the Phase I ESA were grouped by area to assist in the review and evaluation process. Then, in accordance with ASTM, these findings were further evaluated to assess whether they represent a recognized environmental condition in connection with the Site. A total of 285 Findings and twenty-eight (28) Recognized Environmental Conditions were identified within the Sparrows Point Property Phase I ESA. However, only fifty-three (53)

Findings and ten (10) Recognized Environmental Conditions were identified to be present as part of Area A.

A summary of the Recognized Environmental Conditions and associated Findings identified within Area A has been provided below. We have also included a reference to the location within the Sparrows Point Property Phase I ESA Report of where to find more information regarding the site history and current conditions of each Recognized Environmental Condition. A summary of the Recognized Environmental Conditions and associated Findings identified within Area A are as follows:

- REC-6: Rod and Wire and Pipe Mill Area (Findings 131-164) – *Section 9.2, page 9-3*
- REC-10: ATEC (Findings 240-241) – *Section 9.7, pages 9-7 through 9-8*
- REC-11: Air Products (Findings 242-243) – *Section 9.8, page 9-8*
- REC-12: Rail Yards (Findings 244-246) – *Section 9.9, page 9-8 through 9-9*
- REC-13: Transformers (Findings 249) – *Section 9.10, pages 9-9 through 9-10*
- Other Property Locations – *Section 9.13:*
 - REC-17: Coke Oven Gas Drip Legs (Finding 257) – *Page 9-12*
 - REC-20: Former Fuel UST at Contractor's Village (Finding 270) – *Pages 9-15 and 9-16*
 - REC-22: Apparent Historical Surface Impoundment ("G" Gate) (Finding 273) – *Page 9-16*
 - REC-23: Miscellaneous Property Underground Storage Tanks (Finding 275) – *Pages 9-17 and 9-18*
 - REC-24: Miscellaneous Property Spills (Finding 276) – *Page 9-18*

Recognized Environmental Conditions associated with off-site adjoining property RECs have not been included as part of the list for Area A. However, as mentioned previously, additional detail regarding the site history and current conditions of each of the above Recognized Environmental Conditions and adjoining properties can be found within the Phase I ESA dated May 19, 2014

Ms. Barbara Brown

October 1, 2014

Page 3 of 3

using the referenced page numbers included within the above list. In addition, tables documenting these Findings and Recognized Environmental Conditions have been included as **Table 1** and **Table 2**, respectively.

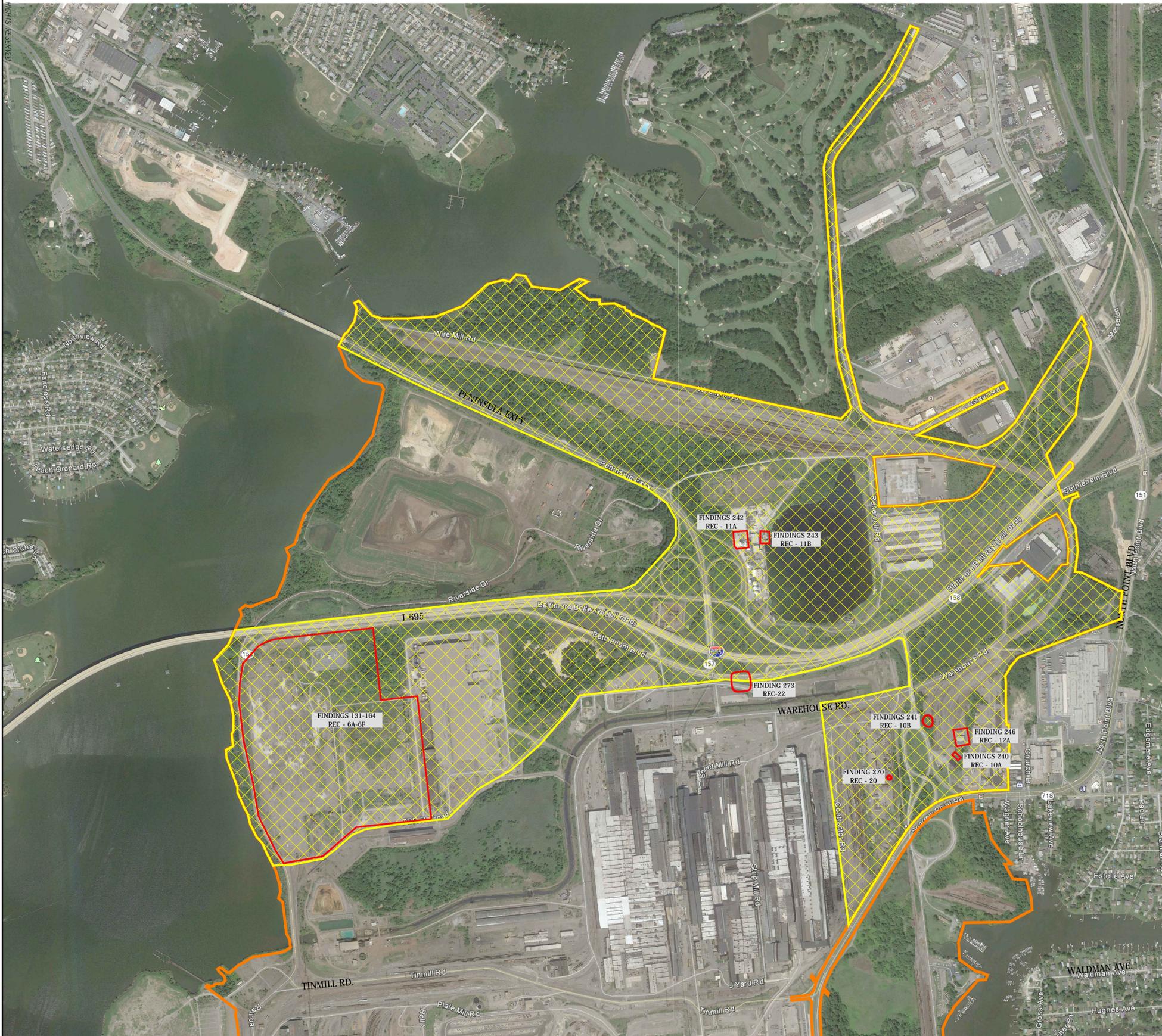
We trust that the above provided information as well as the attached Figures, Tables and complete Phase I ESA for the Sparrows Point Property meets with your expectations. If you should have any questions or comments concerning the enclosed information, please do not hesitate to contact our office.

Sincerely,

Weaver Boos Consultants, LLC

A handwritten signature in dark ink, appearing to read "David W. Weaver", is centered on the page. The signature is written in a cursive style with a large initial "D".

Enclosures: Figure
Tables



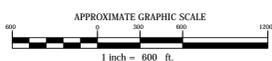
LEGEND

- APPROXIMATE BOUNDARY
- RECOGNIZED ENVIRONMENTAL CONDITIONS (REC)
- FINDING 262
REC - 20
- FINDINGS AND REC IDENTIFICATION
- AREA A

NOTE: RECs NOT DEPICTED ON THIS FIGURE ARE CURRENTLY UNABLE TO BE SPECIFICALLY LOCATED.

SOURCE:
AERIAL IMAGERY ADAPTED FROM GOOGLE EARTH DATED AUGUST 2010.

BOUNDARY INFORMATION ADAPTED FROM BOTH THE SITE OPERATIONAL BOUNDARIES MAP BY ENVIRONALYTICS GROUP DATED DECEMBER 2013, AND THE FORMER BETHLEHEM STEEL SITE MODIFIED CONSENT DECREE REGULATED AREAS FIGURE BY ENVIRONMENTAL OPERATIONS, INC. DATED NOVEMBER 2012.



**RECOGNIZED ENVIRONMENTAL CONDITIONS
FOR AREA A
FORMER RG STEEL
SPARROWS POINT, MARYLAND**

THIS DOCUMENT, AND THE DESIGNS INCORPORATED HEREIN, AS AN INSTRUMENT OF PROFESSIONAL SERVICE, IS THE PROPERTY OF WEAVER BOOS CONSULTANTS, LLC, AND IS NOT TO BE USED IN WHOLE OR IN PART, WITHOUT THE WRITTEN AUTHORIZATION OF WEAVER BOOS CONSULTANTS, LLC.

WEAVER BOOS CONSULTANTS	DRAWN BY: RD REVIEWED BY: CS DATE: 9/17/2014 FILE: 2570-306-01 CAD: BASE5-15-14.DWG
CHICAGO, ILLINOIS (312) 922-1030 www.weaverboos.com	FIGURE 1

Table 1
Phase I ESA Findings Table (Area A)
Sparrows Point, Maryland

Finding	¹ SWMU AOC #	Description	Status During Phase I ESA Site Reconnaissance	Phase I ESA Conclusion	² Basis for Phase I ESA Conclusion	³ RFA Det. Code	DCC Report Recommended Action	⁴ Basis For DCC Report Recommendation
Rod and Wire and Pipe Mill Area								
131	27	Rod Mill Remediation Area	Present and observed	REC	Continuing interim measures (IM) are in place for cadmium/zinc impacted groundwater as per the Consent Decree. During the site visit the existing IM remediation system was observed. Based on this information, the potential for a material release which may impact the environment is present.	SD	No Further Action	IM groundwater remediation under MDE C-O-85-179
132	28	[Filled] Northwest Pond	No longer present, area observed	REC	Continuing interim measures are in place for cadmium/zinc impacted groundwater as per the Consent Decree. During the site visit the existing IM remediation system was observed. Based on our review of historical source information and experience, the Northwest Pond may have potentially contained hazardous substances and/or petroleum products which may have resulted in a release to the environment.	SD	No Further Action	IM groundwater remediation under MDE C-O-85-179
133	29	[Filled] East Pond	Present and observed	REC	Continuing interim measures are in place for cadmium/zinc impacted groundwater as per the Consent Decree. During the site visit the existing IM remediation system was observed. Based on this information, the potential for a material release which may impact the environment is present.	SD	No Further Action	IM groundwater remediation under MDE C-O-85-179
134	30	[Former] Rod Mill Equalization Tanks	No longer present, area observed	Non-REC	These were identified in the DCC Report as former components of the Rod & Wire Mill IM remediation system and no further action is proposed for this item. Being that the system was not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the system has not been identified as a recognized environmental condition.	SD	No Further Action	Removed
135	31	Cadmium Treatment Reactor A Tank	No longer present, area observed	Non-REC	These were identified in the DCC Report as former components of the Rod & Wire Mill IM remediation system and no further action is proposed for this item. Being that the tank was not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the tank has not been identified as a recognized environmental condition.	TP	---	---
136	32	Cadmium Treatment Alkalinization Tank	No longer present, area observed	Non-REC	These were identified in the DCC Report as former components of the Rod & Wire Mill IM remediation system and no further action is proposed for this item. Being that the tank was not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the tank has not been identified as a recognized environmental condition.	TP	---	---
137	33	Cadmium Treatment Thickener	No longer present, area observed	Non-REC	These were identified in the DCC Report as former components of the Rod & Wire Mill IM remediation system and no further action is proposed for this item. Being that the thickener was not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the thickener has not been identified as a recognized environmental condition.	TP	---	---
138	34	Cadmium Treatment Sand Filter	No longer present, area observed	Non-REC	These were identified in the DCC Report as former components of the Rod & Wire Mill IM remediation system and no further action is proposed for this item. Being that the sand filter was not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the sand filter has not been identified as a recognized environmental condition.	TP	---	---
139	35	Cadmium Treatment Piping	No longer present, area observed	Non-REC	These were identified in the DCC Report as former components of the Rod & Wire Mill IM remediation system and no further action is proposed for this item. Being that the piping was not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the piping has not been identified as a recognized environmental condition.	TP	---	---
140	36	Cadmium Treatment Filter Press	No longer present, area observed	Non-REC	These were identified in the DCC Report as former components of the Rod & Wire Mill IM remediation system and no further action is proposed for this item. Being that the filter press was not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the filter press has not been identified as a recognized environmental condition.	TP	---	---
141	37	Cadmium Treatment Sludge Collection Box	No longer present, area observed	Non-REC	These were identified in the DCC Report as former components of the Rod & Wire Mill IM remediation system and no further action is proposed for this item. Being that the collection box was not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the collection box has not been identified as a recognized environmental condition.	TP	---	---
142	38	Cadmium Treatment Trenches	No longer present, area observed	Non-REC	According to the DCC Report no further action is proposed for this area. Being that the trenches were not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the trenches have not been identified as a recognized environmental condition.	SD	No Further Action	Manages groundwater treatment process overflow, re-enters system
143	39	Rod Mill Scale Pits	No longer present, area observed	Non-REC	According to the DCC Report no further action is proposed for this area. Being that the scale pits were not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the scale pits have not been identified as a recognized environmental condition.	NH	No Further Action	No known releases, managed non-hazardous waste
144	40	Rod Mill Cleaning House Containment	No longer present, area observed	Non-REC	Listed as a DCC Report finding observed without a release. Being that the containment area was not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the containment area has not been identified as a recognized environmental condition.	NR	---	---
145	41	Rod Mill Former Waste TCE Storage	No longer present, area observed	Non-REC	Listed as a DCC Report finding observed without a release. Being that the TCE storage was not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the TCE storage has not been identified as a recognized environmental condition.	NR	---	---
146	42	Rod Mill Former Waste Oil Storage Tank	No longer present, area observed	Non-REC	Listed as a DCC Report finding observed without a release. Being that the storage tank was not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the storage tank has not been identified as a recognized environmental condition.	NR	---	---
147	43	Rod Mill Chloroethane Storage Tank	No longer present, area observed	Non-REC	Listed as a DCC Report finding observed without a release. Being that the storage tank was not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the storage tank has not been identified as a recognized environmental condition.	NR	---	---
148	44	Rod Mill Cooling Tower	No longer present, area observed	Non-REC	According to the DCC Report no further action is proposed for this area. Being that the tower was not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the tower has not been identified as a recognized environmental condition.	NH	No Further Action	No known releases, managed non-hazardous waste
149	45	Rod Mill Trenches/Sumps	No longer present, area observed	REC	The DCC Report recommended further action was needed for this item which were back-filled trenches beneath the Rod Mill equipment that managed contact coating. Based on our review of historical source information and experience, the trenches/sumps may have potentially contained hazardous substances and/or petroleum products which may have resulted in a release to the environment.	SD	Further Action	Potential for environmental release
150	46	Pipe Mill Various 55-gallon Drums	No longer present, area observed	Non-REC	Listed as a DCC Report finding observed indoors and without a release. Being that the drums were not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the drums have not been identified as a recognized environmental condition.	I	---	---
151	47	Pipe Mill Oil/Water Separator	No longer present, area observed	Non-REC	Listed as a DCC Report finding observed without a release. Being that the oil/water separator was not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the oil/water separator has not been identified as a recognized environmental condition.	NR	---	---
152	48	Pipe Mill Former Zinc Ammonium Chloride Sludge Storage Area	No longer present, area observed	Non-REC	According to the DCC Report no further action is proposed for this area. Being that the sludge storage area was not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the sludge storage area has not been identified as a recognized environmental condition.	SD	No Further Action	Inactive unit, one release with subsequent soil remediation
153	49	Pipe Mill Trenches/Sumps	No longer present, area observed	REC	The DCC Report recommended further action was needed for this item which were identified as piping designed to transport process wastewater. Based on our review of historical source information and experience, the trenches/sumps may have potentially contained hazardous substances and/or petroleum products which may have resulted in a release to the environment.	SD	Further Action	Focused closure-oriented project
154	50	Billet Prep Waste Oil Storage Tank	No longer present, area observed	Non-REC	Listed as a DCC Report finding observed without a release. Being that the storage tank was not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the storage tank has not been identified as a recognized environmental condition.	NR	---	---
155	51	Billet Prep Rinsewater Collection Tanks	No longer present, area observed	Non-REC	DCC Report finding (indoors, not releasing). Area observed to be vacant land during the site visit. Being that the collection tanks were not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the collection tanks have not been identified as a recognized environmental condition.	I	---	---
156	52	Billet Prep Baghouse Collectors	No longer present, area observed	Non-REC	Listed as a DCC Report finding observed without a release. Being that the collectors were not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the collectors have not been identified as a recognized environmental condition.	NR	---	---
157	53	Billet Prep Trenches and Bind Sumps	No longer present, area observed	Non-REC	According to the DCC Report no further action is proposed for this area. Being that the trenches and sumps were not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the trenches and sumps have not been identified as a recognized environmental condition.	SD	No Further Action	Managed non-hazardous material
158	189	Nail Mill Drum Storage Area	No longer present, area observed	Non-REC	DCC Report finding (previously removed from facility). Area observed to be vacant land during the site visit. Being that the drum storage area was not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the drum storage area has not been identified as a recognized environmental condition.	NR	---	---
159	O	Hydraulic Oil Storage Area	No longer present, area observed	Non-REC	According to the DCC Report no further action is proposed for this area. Being that the oil storage area was not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the oil storage area has not been identified as a recognized environmental condition.	AD	No Further Action	Unit managed non-hazardous, water-based hydraulic oil
160	X	Unknown Aboveground Tank	No longer present, area observed	REC	The DCC Report recommended further action was needed for this item. Based on our review of historical source information and experience, the tank may have contained hazardous substances and/or petroleum products which may have resulted in a release to the environment.	AD	Further Action	Focused closure-oriented project
161	Y	Pipe Mill Selenium Testing Area	No longer present, area observed	Non-REC	According to the DCC Report no further action is proposed for this area. Being that the testing area was not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the testing area has not been identified as a recognized environmental condition.	AD	No Further Action	Former operations located indoors, low release potential
162	Z	Pipe Mill Acid Tanks	No longer present, area observed	REC	The DCC Report recommended further action was needed for this item. Based on our review of historical source information and experience, the acid tanks may have potentially contained hazardous substances which may have resulted in a release to the environment.	AD	Further Action	Focused closure-oriented project
163	AA	Pipe Mill Process Area	No longer present, area observed	Non-REC	According to the DCC Report no further action is proposed for this area. Being that the process area was not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the process area has not been identified as a recognized environmental condition.	AI	No Further Action	---
164	AB	Rod and Wire Process Area	No longer present, area observed	Non-REC	According to the DCC Report no further action is proposed for this area. Being that the process area was not the subject of an enforcement action when brought to the attention of appropriate governmental agency, the process area has not been identified as a recognized environmental condition.	AI	No Further Action	---
ATEC								
"240	---	Hazardous Materials Storage	Present and observed	REC	During the site visit, the former ATEC building on eastern side of Property observed with a hazardous materials room and ASTs with unknown contents or condition. Based on this information, the potential for a material release which may impact the environment is present.	---	---	---
"241	---	Large Possible Historical AST	No longer present, area not observed	REC	A large circular structure appearing to be an AST surrounded by a circular berm is first visible in the 1957 aerial photograph along the east side of Wharf Road at the Sparrow Point Boulevard interchange in an area identified as the Carrier Express Terminal near the ATEC facility. From the presence of the berm, it is considered reasonably likely that the AST contained oil. This feature remains visible in the 1994 aerial photograph, but is no longer present in the 2002 aerial photograph. Based on our review of historical source information and experience, materials in the tank may contain hazardous substances and/or petroleum products which may have resulted in a release to the environment.	---	---	---
Air Products								

**Table 1
Phase I ESA Findings Table (Area A)
Sparrows Point, Maryland**

Finding	¹ SWMU AOC #	Description	Status During Phase I ESA Site Reconnaissance	Phase I ESA Conclusion	² Basis for Phase I ESA Conclusion	³ RFA Det. Code	DCC Report Recommended Action	⁴ Basis For DCC Report Recommendation
*242	---	Exposed Cold Box Insulation	Present and observed	REC	During the site visit, friable insulation of cryogenic cold boxes was observed exposed and released to the ground after their partial demolition. If the insulation is asbestos containing, the materials could enter water and soil in the area. Based on this information, the potential for a material release which may impact the environment is present. Weaver Boos understands that the Air Products facility is to be demolished and removed in the future.	---	---	---
*243	---	Oily Surface Water Discharges to High Head Reservoir	Present and observed	REC	During the site visit, oily water was observed on the surface of the adjoining High Head Reservoir and booms were placed around a discharge pipe coming from Air Products facility. The source and nature of the appearing surface water is unknown. Based on this information, the potential for a material release which may impact the environment is present.	---	---	---
Rail Yards								
*244	---	Greys Rail Yard	Present and observed	Non-REC	Greys Yard is located north of Greys Landfill. During the site visit, no buildings were observed and based on our review of historical records no buildings aside from an office had been present. Therefore, it is unlikely that a material threat of release to the environment is present in association with this yard.	---	---	---
*245	---	Eastern Rail Yard	Present and observed	Non-REC	The Eastern Rail Yard is located on eastern part of the Property. During the site visit, no buildings were observed and based on our review of historical records no buildings had been present. Therefore, it is unlikely that a material threat of release to the environment is present in association with this yard.	---	---	---
*246	---	Maintenance of Way Yard UST	Present and observed	REC	During the site visit, the Maintenance of Way Yard was observed north of the AT&T facility on the Property. Three fuel dispensers were observed during the site visit, one dispenser was marked as gasoline. The area itself has an unknown condition. According to the radius report, this yard is listed in the UST database with a 12,000-gallon gasoline tank listed as permanently out of service. No further information is available. Based on this information, the potential for a material release which may impact the environment is present.	---	---	---
Transformers								
*249	---	Former PCB Containing Transformers	Generally present and observed	REC	According to historical documents, 28 larger transformers were formerly on the Property and based on testing were determined to contain PCBs. Two of these transformers are still in service. Based on this information, the potential for a material release which may impact the environment is present.	---	---	---
Other Property Locations								
255	196	Storm Water Sewer System	Present and observed (several locations)	Non-REC	The DCC Report recommended No Further Action was needed for this system. During the site visit, the area was observed to be in good condition with no obvious stains or spills near storm water receptors. Therefore, it is unlikely that a material threat of release to the environment is present in association with this system.	SD	No Further Action	Storm water and industrial wastewater combined as NPDES permitted discharge
257	---	Coke Oven Gas Drip Legs	Potentially present, areas not observed	REC	The DCC Report recommended further action was needed for this item. No obviously apparent drip legs were observed during the site visit, but comments provided by site contacts indicated their former presence and use. Based on this information, the potential for a material release which may impact the environment is present.	---	Further Action	Per DCC Report, added as an AOC for evaluation
*258	---	Asbestos in Warehouse Buildings to Remain	Present and observed	Non-Scope	SACM such as suspect transite panels observed in warehouses to remain on the Property post-demolition. Materials should be managed accordingly should damage or demolition activities occur.	---	---	---
*259	---	BGE Substations	Present and observed	Non-REC	At least two large electrical substations owned and operated by BGE are present on the Property. The substations appeared to be in good condition during the site visit, but visibility was limited. However as the owner BGE is required to maintain the facilities as per all applicable regulations. Therefore, it is unlikely that a material threat of release to the environment is present in association with these substations.	---	---	---
*260	---	Fly Dumping	Present and observed	Non-REC	Fly dumping was observed on the side of Property roads outside of the main facility and in vacant unmonitored areas during the site visit. While any historical fly dumping is unknown current fly dumping appears to be comprised of general refuse, household equipment and boats. According to site contacts historical fly dumping large consisted of similar items. Therefore, it is unlikely that a material threat of release to the environment is present in association with fly dumping.	---	---	---
*264	---	Radioactive Materials	Present, not observed	Non-REC	A radioactive materials area was marked in the Hot Mill building during site visit. Radioactive materials have been reportedly removed and are stored on Property in a sealed vault in the Dietrich Building. Therefore, it is unlikely that a material threat of release to the environment is present in association with these materials.	---	---	---
*270	---	Former Fuel UST at Contractor's Village	Present and observed	REC	This UST was formerly used by subcontractors for the Property. During the site visit, it was observed as material storage. It is a reported former diesel UST location. The area was historically used for equipment repairs and storage. Based on this information, the potential for a material release which may impact the environment is present.	---	---	---
*273	---	Apparent Historical Surface Impoundment ("G" Gate)	No longer present, area observed	REC	According to historic documents, a small, dark, irregularly shaped impoundment to be a pond is visible immediately north of the Tin Mill Canal, in the area that is now a vehicle parking lot just east of the "G" Gate along the south side of Route 158. This pond appears to be discharging a dark plume to the adjoining surface water of the remnant Humphrey Creek. This historic feature is located north of the TMC/Finishing Mills Special Study Area boundary. Based on our review of historical source information and experience, this area may have contained potentially hazardous substances and/or petroleum products which may have resulted in a release to the environment.	---	---	---
*275	---	Miscellaneous Property Underground Storage Tanks	Potentially present, locations generally unknown	REC	Based on Weaver Boos' review of regulatory records and historical reports, twelve (12) to 34 USTs may have been or currently are present on the Property. These USTs contained materials such as fuel oil, gasoline, diesel fuel, waste oil, mixtures and other materials. Samples collected during the removal of select USTs indicate concentrations of TPH above MDE cleanup standards. The exact locations of these USTs is unknown as well as if each UST is unique or duplicative. Some of these USTs may also be referencing USTs known to have been present, such as at the Mason's Garage or Contractor's Village. Therefore, based on our review of historical source information and experience, the known or potential releases from these USTs needs the definition of a recognized environmental condition.	---	---	---
*276	---	Miscellaneous Property Spills	Locations unknown	REC	The Property was listed numerous times in various spills related databases associated with spills of materials including, but not limited to, wash oil, waste oil, PCBs, oils, chemicals, spent pickle liquor and other materials ranging in size from 1-gallon to 5,000-gallons. Many of these spills were of a quantity larger than 100-gallons, had no cleanup performed, or otherwise had no information. The exact locations of these spills is currently unknown. These releases may have resulted in impact to the environment.	---	---	---
*280	---	Mud Reservoir	Present, area not observed	Non-REC	The Mud Reservoir is a diamond-shaped area of mixed open/wooded land located in the County Lands 2 (CL2) Parcel in the northwestern portion of the Site. Much of the CL2 is developed and includes the former Pipe Mill and Cold Mill complexes. The Mud Reservoir received mud and clays from the former Humphrey Impoundment. Based on Weaver Boos' review of the organic data for VOCs, SVOCs, PAHs, and PCBs, concentrations were non-detect to minimal ppb levels. Sufficient data exists to conclude that no further assessment or action is warranted.	---	---	---

Notes:
 --- Not Applicable
 DCC Report: Description of Current Conditions Report (January 1998)
 Non-REC: A Finding which has been determined to not represent a recognized environmental condition for the Property
 *Finding Number: Items which were identified over the course of the Phase I ESA which had not been previously identified as a Finding in other historical environmental reports such as the RFA and DCC Report.
¹ The source of this information was taken from the RFA (1993) and/or the DCC Report (January 1998).
² A recognized environmental condition (REC) is defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at the Property due to any release to the environment, under conditions indicative of a release to the environment, or under conditions that pose a material threat of a future release to the environment. Therefore, Weaver Boos identified the presence of a REC in instances when one of the following was present: an obviously apparent indication of a release was observed during the site visit, a previously detected release was identified as represented within the historical documentation reviewed, and/or the material threat of a release is or was possible based on the current and/or historical uses, operations, and facilities present based upon Weaver Boos' experience and knowledge of sites of a similar nature.

RCRA Facility Report (RFA) Codes
 SD = SWMU Description included in Section 4 of the RFA document
 AD = AOC Description provided in RFA Report
 I = Units located indoors and not observed to be releasing
 TR = Treatment process units managing waste not observed to be releasing
 NR = Units located outdoors but not observed to be releasing
 NH = Unit managing non-hazardous waste
 RS = Unit that no longer exists and was removed from site
 AI = Additional information needed to assess potential for release
 CV = Units of concern, inability to assess which unit was releasing

**Table 2
Phase I ESA
REC Table (Area A)**

Sparrows Point, Maryland

Finding	RECs	1 SWMU/ AOC #	Description	Status During Phase I ESA Site Reconnaissance	Phase I ESA Conclusion	2 Basis for Phase I ESA Conclusion	RFA Det. Code	DCC Report Recommended Action	3 Basis For DCC Report Recommendation
6 Rod and Wire and Pipe Mill Area									
131	6A	27	Rod Mill Remediation Area	Present and observed	REC	Continuing interim measures (IM) are in place for cadmium/zinc impacted groundwater as per the Consent Decree. During the site visit the existing IM remediation system was observed. Based on this information, the potential for a material release which may impact the environment is present.	SD	No Further Action	IM groundwater remediation under MDE C-O-85-179
132	6B	28	[Filed] Northwest Pond	No longer present, area observed	REC	Continuing interim measures are in place for cadmium/zinc impacted groundwater as per the Consent Decree. During the site visit the existing IM remediation system was observed. Based on our review of historical source information and experience, the Northwest Pond may have potentially contained hazardous substances and/or petroleum products which may have resulted in a release to the environment.	SD	No Further Action	IM groundwater remediation under MDE C-O-85-179
133	6C	29	[Filed] East Pond	Present and observed	REC	Continuing interim measures are in place for cadmium/zinc impacted groundwater as per the Consent Decree. During the site visit the existing IM remediation system was observed. Based on this information, the potential for a material release which may impact the environment is present.	SD	No Further Action	IM groundwater remediation under MDE C-O-85-179
153	6D	49	Pipe Mill Trenches/Sumps	No longer present, area observed	REC	The DCC Report recommended further action was needed for this item which were identified as piping designed to transport process wastewater. Based on our review of historical source information and experience, the trenches/sumps may have potentially contained hazardous substances and/or petroleum products which may have resulted in a release to the environment.	SD	Further Action	Focused closure-oriented project
160	6E	X	Unknown Aboveground Tank	No longer present, area observed	REC	The DCC Report recommended further action was needed for this item. Based on our review of historical source information and experience, the tank may have contained hazardous substances and/or petroleum products which may have resulted in a release to the environment.	AD	Further Action	Focused closure-oriented project
162	6F	Z	Pipe Mill Acid Tanks	No longer present, area observed	REC	The DCC Report recommended further action was needed for this item. Based on our review of historical source information and experience, the acid tanks may have potentially contained hazardous substances which may have resulted in a release to the environment.	AD	Further Action	Focused closure-oriented project
10 ATEC									
240	10A	---	Hazardous Materials Storage	Present and observed	REC	During the site visit, the former ATEC building on eastern side of Property observed with a hazardous materials room and ASTs with unknown contents or condition. Based on this information, the potential for a material release which may impact the environment is present.	---	---	---
241	10B	---	Large Historical Possible AST	No longer present, area not observed	REC	A large circular structure appearing to be an AST surrounded by a circular berm is first visible in the 1957 aerial photograph along the east side of Vinland Road at the Sparrows Point Boulevard interchange in an area identified as the Carrier Express Terminal near the ATEC facility. From the presence of the berm, it is considered reasonably likely that the AST contained oil. This feature remains visible in the 1994 aerial photograph, but is no longer present in the 2002 aerial photograph. Based on our review of historical source information and experience, materials in the tank may contain hazardous substances and/or petroleum products which may have resulted in a release to the environment.	---	---	---
11 Air Products									
242	11A	---	Exposed Cold Box Insulation	Present and observed	REC	During the site visit, insulative insulation of cryogenic cold boxes was observed exposed and released to the ground after their partial demolition. If the insulation is asbestos containing, the materials could enter water and soil in the area. Based on this information, the potential for a material release which may impact the environment is present. Weaver Boos understands that the Air Products facility is to be demolished and removed in the future.	---	---	---
243	11B	---	City Surface Water Discharges to High Head Reservoir	Present and observed	REC	During the site visit, city water was observed on the surface of the adjoining High Head Reservoir and booms were placed around a discharge pipe coming from Air Products facility. The source and nature of the city-appearing surface water is unknown. Based on this information, the potential for a material release which may impact the environment is present.	---	---	---
12 Rail Yards									
246	12A	---	Maintenance of Way Yard UST	Present and observed	REC	During the site visit, the Maintenance of Way Yard was observed north of the ATEC facility on the Property. Three fuel dispensers were observed during the site visit, one dispenser was marked as gasoline. The area itself has an unknown condition. According to the radon report, this yard is listed in the UST database with a 12,000-gallon gasoline tank listed as permanently out of service. No further information is available. Based on this information, the potential for a material release which may impact the environment is present.	---	---	---
13 Transformers									
249	13A	---	Former PCB Containing Transformers	Generally present and observed	REC	According to historical documents, 28 larger transformers were formerly on the Property and based on testing were determined to contain PCBs. Two of these transformers are still in service. Based on this information, the potential for a material release which may impact the environment is present.	---	---	---
Other Property Locations									
257	17	---	Coke Oven Gas Drip Legs	Potentially present, areas not observed	REC	The DCC Report recommended further action was needed for this item. No obviously apparent drip legs were observed during the site visit, but comments provided by site contacts indicated their former presence and use. Based on this information, the potential for a material release which may impact the environment is present.	---	Further Action	Per DCC Report, added as an AOC for evaluation
270	20	---	Former Fuel UST at Contractor's Village	Present and observed	REC	The UST was formerly used by subcontractors for the Property. During the site visit, it was observed as material storage. It is a reported former diesel UST location. The area was historically used for equipment repairs and storage. Based on this information, the potential for a material release which may impact the environment is present.	---	---	---
273	22	---	Apparent Historical Surface Impoundment ("O" Gate)	No longer present, area observed	REC	According to historic documents, a small, dark, irregularly shaped image appearing to be a pond is visible immediately north of the Tin Mill Canal, in the area that is now a vehicle parking lot just east of the "O" Gate along the south side of Route 158. This pond appears to be discharging a dark plume to the adjoining surface water of the remnant Humphrey Creek. This historic feature is located north of the TAC/Pinning Mills Special Study Area boundary. Based on our review of historical source information and experience, this area may have contained potentially hazardous substances and/or petroleum products which may have resulted in a release to the environment.	---	---	---
275	23	---	Miscellaneous Property Underground Storage Tanks	Potentially present, locations generally unknown	REC	Based on Weaver Boos' review of regulatory records and historical reports, twelve (12) to 34 USTs may have been or currently are present on the Property. These USTs contained materials such as fuel oil, gasoline, diesel fuel, waste oil, molasses and other materials. Samples collected during the removal of select USTs indicate concentrations of TPH above MDE cleanup standards. The exact locations of these USTs is unknown as well as if each UST is unique or duplicate. Some of these USTs may also be referencing USTs known to have been present, such as at the Mason's Garage or Contractor's Village. Therefore, based on our review of historical source information and experience, the known or potential releases from these USTs meets the definition of a recognized environmental condition.	---	---	---
276	24	---	Miscellaneous Property Spills	Locations unknown	REC	The Property was tested numerous times in various spills related databases associated with spills of materials including, but not limited to, wash oil, waste oil, PCBs, oils, chemicals, spent pickle liquor and other materials ranging in size from 1-gallon to 5,000-gallons. Many of these spills were of a quantity larger than 100-gallons, had no cleanup performed, or otherwise had no information. The exact locations of these spills is currently unknown. These releases may have resulted in impact to the environment.	---	---	---

Notes:
 --- Not Applicable
 DCC Report: Description of Current Conditions Report (January 1998)
 Non-REC: A Finding which has been determined to not represent a recognized environmental condition for the Property
 Finding Number: Items which were identified over the course of the Phase I ESA which had not been previously identified as a Finding in other historical environmental reports such as the RFA and DCC Report.
 1 The source of this information was taken from the RFA (1993) and/or the DCC Report (January 1998).
 2 A recognized environmental condition (REC) is defined as the presence or likely presence of any hazardous substance or petroleum product in, on, or at the Property due to any release to the environment, under conditions indicative of a release to the environment, or under conditions that pose a material threat of a future release to the environment. Therefore, Weaver Boos identified the presence of a REC in instances when one of the following was present: an obviously apparent indication of a release was observed during the site visit, a previously detected release was identified as represented within the historical documentation reviewed, and/or the material threat of a release is or was possible based on the current and/or historical uses, operations, and facilities present based upon Weaver Boos' experience and knowledge of sites of a similar nature.
RFA Facility Report (RFA) Codes
 AD = AOC Description included in Section 4 of the RFA document
 SD = AOC Description provided in RFA Report
 I = Units located indoors and not observed to be releasing
 TP = Treatment process units managing waste not observed to be releasing
 NR = Units located outdoors but not observed to be releasing
 NH = Units managing non-hazardous waste
 RS = Unit that no longer exists and was removed from site
 At = Additional information needed to assess potential for release
 CV = Units of concern, inability to assess which unit was releasing