



# MARYLAND DEPARTMENT OF THE ENVIRONMENT

1800 Washington Boulevard • Baltimore MD 21230

410-537-3000 • 1-800-633-6101 • www.mde.state.md.us

Martin O'Malley  
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Secretary

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Lieutenant Governor

May 22, 2013

## CERTIFIED MAIL

Russell Becker, Vice President, Remediation  
Sparrows Point, LLC  
1650 Des Peres Road, Suite 303  
St. Louis, Missouri 63131

RE: Coke Point Landfill

Dear Mr. Becker:

As stated in the June 25, 2010 letter from Severstal to the Maryland Department of the Environment ("Department"), the Coke Point Landfill has been utilized for industrial waste disposal associated with the Sparrows Point Steel mill operations since the early 1970's and has also been identified as a Special Study Area subject to corrective measures as outlined in the 1997 Consent Decree. The Consent Decree in Article VII(C) also provides specific requirements for landfill operations, monitoring, closure and post-closure in accordance with the appropriate sections of COMAR 26.04.07.

In correspondence dated November 16, 2012, to the Agencies (EPA and MDE), Sparrows Point, LLC stated the following in a proposed modification to the CD:

*The Consent Decree shall not impose on Sparrows Point LLC Compliance Requirements for Coke Point Landfill as set forth in Article VII(C) as the Coke Point Landfill is no longer operational. This paragraph shall not apply to corrective measures work for Coke Point Landfill as set forth in Article V of the Consent Decree, as amended, which will remain in full force and effect.*

The Agencies have subsequently rejected this proposed modification to the CD and the Coke Point Landfill remains subject to the requirements outlined in the Article VII(C) of the CD and COMAR 26.04.07. Of note in this proposed modification is that Sparrows Point, LLC considers Coke Point Landfill non-operational. The current status of the Coke Point Landfill was also discussed during a conference call with the Agencies on May 1, 2013, during which Sparrows Point, LLC stated that the Coke Point Landfill was no longer receiving waste but was still conducting recycling activities. A description of the previous recycling activities conducted to recover iron bearing material was provided to MDE by Severstal in correspondence dated September 11, 2009.



Since the August 13 2009 letter to Severstal, the Department has directed previous owners to address the issue of slope stabilization around the Coke Point Landfill. On November 16, 2011, the subsequent owner after Severstal, RG Steel submitted the Coke Point Landfill Erosion and Sediment Control Plan dated October 14, 2011 to the Department. This plan was received by the Baltimore County Soil Conservation District ("BCSCD") on November 7, 2011 and returned to RG Steel with comments on November 18, 2011. This plan was intended to provide an intermediate step to be implemented prior to development of the final Coke Point Landfill closure plan which would address the most pressing issues of slope stabilization. RG Steel did not respond to the BCSCD's comments and did not complete the required slope stabilization at the Coke Point Landfill.

Sparrows Point, LLC has continued with the ground water monitoring requirements for the Coke Point Landfill and has collected the first semi-annual round of samples from the monitoring wells in 2013. This data will be submitted in a report to the Department. Previous sampling conducted in April 2011 by prior owner RG Steel has identified elevated levels of benzene (15,000 ppb) in a shallow well located on the eastern portion of the Landfill (CP08-PZM008).

Based on a review of the site status and outstanding unmet requirements given to previous owners to achieve environmental compliance at the Coke Point Landfill, the Department is requiring Sparrows Point, LLC, as the current property owner, to submit the following to the Department within 60 days of receipt of this letter:

1. Provide a written statement regarding the status of the Coke Point Landfill, including documenting any on-going activities such as slag storage, tenants, scrap storage etc. located within the Coke Point Landfill footprint on a scaled site map. If the Coke Point Landfill is no longer accepting wastes, provide the date this decision was enacted, provide an updated operations manual for the Landfill and the current configuration of the access control berms and gate access structures previously proposed and installed at the facility. Describe specific measures that Sparrows Point LLC employs to prevent unauthorized waste disposal at Coke Point. The Department will conduct an inspection of the current conditions at the Coke Point Landfill in the near term and will contact you to arrange a date.
2. If Sparrows Point, LLC is continuing to conduct iron bearing material recovery and concrete recycling at the facility, a complete update, similar to the document submitted on September 9, 2009, must be submitted which includes a specific description of the recovery/recycling activities, how they are being conducted, what specifically is being recovered/recycled, who is receiving the recovered/recycled material, areas where recovery/recycling activities previously occurred, are currently occurring and any other areas within the Coke Point Landfill footprint that are planned for future recovery/recycling activities including areas where material is being segregated and stored. These historic, current and proposed areas must be detailed on a current topographic map. The plan must include a defined end date to the recycling. The Department may or may not authorize recycling activities to continue beyond a specific date.

3. Provide a summary of material removed since the September 2009 update. For all future recycling activities conducted at the Coke Point Landfill provide quarterly updates on material recovered, including in the initial report a summary of any recycling activities that occurred after September 14, 2012, when Sparrows Point LLC acquired the property.
4. If recycling activities at the Coke Point Landfill will be completed within six months of this letter, Sparrows Point, LLC must provide a schedule for submitting a grading plan that complies with 26.04.07.19 E (5) regarding the final cover placement. The grading plan must be submitted to the appropriate regulatory authorities including BCSCD and address any storm water management requirements and/or permitting requirements. Sparrows Point, LLC must notify the Department of the final completion date of any recycling activities which will be considered the final landfill closure date and require implementation of the final cover plan. Within six months of the final closure date, Sparrows Point, LLC must submit a final closure plan as outlined in Article VII(C) of the Consent Decree and COMAR 26.04.07.19, .21 and .22.
5. If recycling activities are approved to continue at Coke Point for an extended period, Sparrows Point LLC must submit a firm schedule to the Department to complete the review and approval process for the Coke Point Landfill Erosion and Sediment Control Plan dated October 14, 2011 and begin implementing the intermediate slope stabilization.
6. To determine whether the source of the benzene at CP08-PZM008 originates from within the Coke Point Landfill or from other sources, such as the Coke Oven area, Sparrows Point, LLC must submit a detailed investigation work plan including appropriate well/sample locations on a scaled site plan to the Department for approval.

Copies of the correspondence referenced in this letter have been provided as attachments. If you have any questions regarding these requirements, please contact me at 410-537-3493.

Sincerely,



Barbara H. Brown, Project Coordinator  
Land Management Administration

Enclosures

cc: Andrew Fan, EPA Region III, Project Coordinator  
Matthew Zimmerman, Esq., Assistant Attorney General  
Horacio Tablada, Director Land Management Administration  
Edward Dexter, Program Administrator, Solid Waste Program



# MARYLAND DEPARTMENT OF THE ENVIRONMENT

**MDE**

1800 Washington Boulevard • Baltimore MD 21230

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Martin O'Malley  
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Shari T. Wilson  
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Anthony G. Brown  
Lieutenant Governor

Robert M. Summers, Ph.D.  
Deputy Secretary

## CERTIFIED MAIL

August 13, 2009

Mr. Russell Becker  
Environmental Program Manager  
Severstal Sparrows Point  
1430 Sparrows Point Boulevard  
Sparrows Point, Maryland 21219

Dear Mr. Becker:

The Maryland Department of the Environment continues to evaluate the work conducted to date under the Consent Decree (Docket No. JFM-97-558 & JFM-97-559 effective date October 8, 1997). Although Severstal and prior owners of the steel mill have made significant progress addressing specific items in the Consent Decree, including conducting a site wide environmental site assessment, stabilizing Greys Landfill, and operating a remediation system at the Rod & Wire Mill Sludge Bin Storage Area, there is a great deal of assessment and remedial work yet to be accomplished and required by the Consent Decree. The Department has identified the following items that require a detailed and timely response from Severstal.

### **Community Outreach Plan**

In an October 22, 2008 letter to Mr. Thomas Russo, MDE offered several suggestions for enhanced community outreach. It is essential to craft and implement an effective community outreach plan including periodic meetings, a website with appropriately updated content and citizen group involvement in order to inform the community of the work already completed and ongoing efforts, to address misinformation that may be circulated, and to receive citizen input. To date, it is my understanding that Severstal has held one community meeting and has plans to hold meetings in the future and develop a website. The Department is not aware of a specific schedule for these activities. The Department requests that the company develop and submit to MDE a complete community outreach plan by December 31, 2009.

Mr. Russell Becker  
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### **Off-site Sediment Sampling Plan**

As detailed in the August 6, 2009 letter from the Maryland Office of the Attorney General to counsel for Mittal and Severstal, MDE fully intends to require Mittal and Severstal to perform sediment evaluation under the consent decree. A work plan for evaluating the impacts to off-site sediment must be submitted to MDE and EPA within sixty (60) days of receipt of this letter. The work plan must include a detailed schedule for completing the work upon approval of the plan. The plan may utilize the results of sediment sampling already completed by AES Sparrows Point LNG and the Maryland Port Administration.

### **Coke Oven Area**

As noted in the February 19, 2009 letter from EPA, the site wide investigation completed between 2005 and 2007 has identified significant levels of groundwater contamination in the Coke Oven area with measurable levels of Benzene in surface water samples. The Department is concerned that the groundwater remediation is not being adequately and aggressively approached to prevent further offsite release of benzene and other contaminants. The Department is also concerned that the movement of the groundwater plume may be affected by the periodic operation of the Graving Dock at the adjacent Shipyard property.

The Department recently reviewed the Coke Oven Area Special Study Area: Dual Phase Interim Measures: Soil Vapor Extraction (SVE), Air Sparging and Groundwater Pumping Phase I (Pilot Testing) work plan dated July 2009 and while the plan appears technically sufficient to gather information required to design and implement remediation, the Department comments will request that Severstal provide a detailed description of the interim remediation system or systems due to the size of the area affected, the location of each system, the intended area of influence of each system, a testing program to demonstrate that the system(s) achieve hydraulic control of the contamination plume and a detailed aggressive installation schedule for system installation, which we understand may progress from temporary trailer mounted or portable system(s) to a larger more permanent system(s) in the final report as noted on page 11 of the work plan.

### **Coke Point Landfill**

The Department requires a written update within thirty (30) days of receipt of this letter on the status of the recycling efforts at the Coke Point Landfill. The update should include a description of the removal process and amount of material removed. The update should include a description of the schedule for implementing the slope stabilization for the landfill and for addressing any deficiencies in the sediment control noted during previous inspections.

The Department prefers to work in a cooperative manner to achieve the substantive requirements of the Consent Decree in order to protect human health and the environment. Failure to pursue these requirements in a timely manner may subject the company to a claim for stipulated penalties as provided for in the Consent Decree.

Mr. Russell Becker  
Page Three

The Department is also committed to assigning the staff necessary to ensure timely review of current and future submissions, to conduct on-site oversight of field activities, and other activities related to oversight. To carry out this work, a technical team, headed by Ms. Barbara Brown as the new project coordinator, has been assigned to this site. In addition, please be advised that beginning September 1, 2009, MDE will charge for its oversight costs, as is required by Section 7-221 of the Environment Article, *Annotated Code of Maryland*. Detailed invoices will be submitted to the company for costs incurred on a quarterly basis as is customary.

If you would like to discuss these issues further, please contact me or Mr. Mitch McCalmon, Deputy Director, Land Management Administration at 410-537-3304.

Sincerely,



Horacio Tablada, Director *for*  
Land Management Administration

cc: Abraham Ferdas, Director, EPA Region III Land and Chemicals Division  
Shari T. Wilson, Secretary

 **MARYLAND DEPARTMENT OF THE ENVIRONMENT**  
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Martin O'Malley  
Governor

Anthony G. Brown  
Lieutenant Governor

September 9, 2010

Shari T. Wilson  
Secretary

Robert M. Summers, Ph.D.  
Deputy Secretary

**CERTIFIED MAIL**

Mr. Russell Becker  
Environmental Engineering & Affairs  
Severstal Sparrows Point  
1430 Sparrows Point Boulevard  
Sparrows Point, Maryland 21219

Re: Consent Decree, Civil Action Nos. JFM-97-558, JFM-97-559

Dear Mr. Becker:

The Land Management Administration ("LMA") of the Maryland Department of the Environment ("Department") has reviewed your letter and work plan dated June 25, 2010, prepared in response to the Department's January 8, 2010 letter, issues raised in your February 8, 2010 Notice of Dispute and the subsequent dispute resolution meeting held on May 26, 2010. The work plan addressing the compliance action items included in the January 8, 2010 letter is approved by the Department in accordance with the following conditions as summarized below:

- 1. Provide a map that delineates the actual footprint of the Coke Point Landfill.**  
All parties agree that Drawing C-002 referenced in the Facility-Wide Waste Minimization Plan Work Plan for the Recovery and Recycling of Iron Bearing and Concrete Materials from Coke Point Landfill also submitted to Baltimore County Soil Conservation District (BCSCD) as part of the erosion/ sediment control plan in August 2008 will serve as the footprint of Coke Point Landfill for all future waste management activities. This map will also be incorporated into the revised operations manual.
- 2. Clearly and permanently mark the boundaries of the Coke Point Landfill to prevent unauthorized access and unauthorized disposal as stated in Section VII Compliance Requirement for Coke Point and Greys Landfill Operation of the Consent Decree.**  
As noted in the June 25, 2010 work plan, access control berms and gate access structures will be installed to mark the boundaries of the Coke Point Landfill and restrict access to authorized users within three months of receipt of this letter. At least one month prior to initiating construction, the location of the proposed berms and gate access structures must be noted on a copy of Drawing C-002 and submitted to the Department for approval. The installation of the access control berms must comply with all applicable State and local permit requirements.



- 3. Identify areas with unauthorized dumping and characterize the waste material identified.**  
The work plan must also include a evaluation of the material observed during a site visit conducted on June 24, 2009 by an inspector from the Department's Solid Waste Program, that included assorted wastes including plastics, wood, trash and other material described as unauthorized dumping that was observed in the southeast corner of the Coke Point Landfill. Severstal must provide a written evaluation of the material and state whether any material is "unacceptable waste" as described in the Consent Decree, Section VII. Compliance Requirements, Item C 1.c. Any material identified as "unacceptable" must be removed.
- 4. Characterize refractory brick debris observed throughout the landfill area.**  
As noted in the June 25, 2010 letter, Severstal is proceeding with an assessment of the type and usage and typical quantity of refractory brick used at the facility and will submit the assessment to the Department within one month of the work plan approval. Upon review of the assessment the Department will determine if laboratory testing will be required for characterization of refractory brick currently in the Coke Point Landfill and for future refractory brick disposal.
- 5. Revise the operations manual.**  
The work plan states that a revised operations manual will be provided within six weeks of the work plan approval.
- 6. Implement quarterly ground water monitoring.**  
The work plan indicates that an assessment of the existing monitoring wells will be submitted to the Department within one month of approval of the work plan. Upon receipt and review of the monitoring well assessment the Department will confirm the proposed monitoring well sampling plan. It is anticipated that the first quarterly sampling round will be conducted in the 3<sup>rd</sup> quarter of 2010.
- 7. Implement surface run off monitoring**  
Surface run off monitoring may be required when landfill facility improvements are designed and installed in the future. The work plan acknowledged that whatever changes are made to the site's stormwater controls will be included in a timely revision to the facility's NPDES Permit Stormwater Pollution Prevention plan.
- 8. Slope Stabilization**  
The work plan states that a draft engineered plan will be provided to the Department within three months of the work plan approval. The final schedule for completing the grading activities will be developed once an approved erosion and sediment control plan is obtained from the Baltimore County Soil Conservation District (BCSCD) and the Department. As noted in the work plan, the Department will be provided monthly progress reports during the plan approval process.

To inform any interested parties about the timeframe and scope of activities that will take place pursuant to the numbered items above, the Department will hold a public informational meeting within one month of the start of any substantial field activities (large equipment on site, earth moving, etc.). The Company should plan to attend the meeting with Department representatives to present their work plan and to address any questions/concerns the public may have.



Mr. Russell Becker  
Page 3

As stated in the June 25, 2010, Severstal noted that approval of the proposed work plan will eliminate the requirement to proceed with formal dispute resolution of the issues raised in the February 8, 2010 letter. It should be noted that the resolution of this dispute and implementation of the approved work plan is governed by the compliance provisions of the existing consent decree, including but not limited to, force majeure and stipulated penalties. If you have any questions or would like to discuss these issues further, please contact Project Coordinator Ms. Barbara Brown, at 410-537-3212.

Sincerely,



Horacio Tablada, Director  
Land Management Administration

cc Abraham Ferdas, Director EPA Region III, Land and Chemicals Division  
Jay Sakai, Director, MDE Water Management Administration  
Mitch McCalmon, Deputy Director, MDE Land Management Administration  
Edward Dexter, Program Administrator, MDE Land Management Administration  
Susan Hodges, Esquire, EPA Senior Assistant Regional Counsel  
Matthew Zimmerman, Esquire, Assistant Attorney General  
Andrew Fan, EPA Region III, Project Coordinator  
Barbara Brown, MDE Project Coordinator





September 11, 2009

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

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

Dear Ms Brown:

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

#### **Removal Process Description**

##### **Material Separation Procedures**

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

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

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

##### **Dust Control**

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

Severstal Sparrows Point

T: (410)388-6622

1430 Sparrows Point Blvd.

F: (410) 388-6529

Sparrows Point, MD 21219 USA

E: Russ.Becker@severstalna.com

Odor Control

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

Stormwater Control

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

Recovered Material Quantities

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

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

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

Status

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

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

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

Sincerely,



Russell Becker  
Environmental Program Manager

Attachment

Severstal Sparrows Point	T: (410)388-6622
1430 Sparrows Point Blvd.	F: (410) 388-6529
Sparrows Point, MD 21219 USA	E: Russ.Becker@severstalna.com



FETI  
FRITZ ENTERPRISES, INC.  
Sparrows Point Division

August 2008

Units: NET TONS

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



Sparrows Point Division

FRITZ ENTERPRISES, INC.

September 2008

Units: NET TONS

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



Sparrows Point Division

FRITZ ENTERPRISES, INC.

October 2008

Units: NET TONS

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



Sparrows Point Division

FRITZ ENTERPRISES, INC.

November 2008

Units: NET TONS

NO ACTIVITY

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



Sparrows Point Division

FRITZ ENTERPRISES, INC.

December 2008

Units: NET TONS

NO ACTIVITY

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



FRITZ ENTERPRISES, INC.  
Sparrows Point Division

January 2009

Units: NET TONS      NO ACTIVITY

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



**FRITZ ENTERPRISES, INC.**  
**Sparrows Point Division**

**February 2009**

Units: NET TONS

NO ACTIVITY

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



FRITZ ENTERPRISES, INC.  
Sparrows Point Division

March 2009

Units: NET TONS

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



FRETZ ENTERPRISES, INC.  
Sparrows Point Division

April 2009

Units: NET TONS

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



FRITZ ENTERPRISES, INC.

Sparrows Point Division

May 2009

Units: NET TONS

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



F&I ENTERPRISES, INC.

Sparrows Point Division

June 2009

Units: NET TONS

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



FRITZ ENTERPRISES, INC.  
Sparrows Point Division

July 2009

Units: NET TONS

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



June 25, 2010

Mr. Andrew Fan  
US EPA Region III, 3WC23  
1650 Arch Street  
Philadelphia, PA 19103-2029

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

**Re: Consent Decree, Civil Action Nos. JFM-97-558, JFM-97-559  
Regarding January 8, 2010 Decision to Require Interim Measures  
Coke Point Landfill**

Dear Mr. Fan and Ms. Brown:

This letter proposes an updated compliance plan and associated schedule that is intended to address Coke Point Landfill operational requirements outlined in the MDE correspondence dated January 8, 2010 as further modified by discussions agreed to in a meeting with MDE on May 26, 2010. During the meeting, it was agreed that the landfill operational items originally requested in MDE's January 8, 2010 letter as additional Interim Measures under Section V.A.4 of the Consent Decree instead will be addressed as part of the requirements for landfill operation outlined in Section VII.C of the Consent Decree.

Procedures have been developed to address the landfill operational items and are hereby submitted with an associated milestone schedule to MDE for approval in accordance with the timeframe agreed to between myself and Barbara Brown on June 2, 2010. The procedures are consistent with requirements outlined in Section VII.C of the Multimedia Consent Decree as appropriate for the planned use of the landfill facility. We also note that with the outstanding February 8, 2010 Notice of Dispute that MDE's subsequent approval of today's submittal will eliminate the need to request formal dispute resolution of these issues.

Action items that have been identified for Coke Point Landfill include the following:

- **Delineate the actual footprint of the Coke Point Landfill;**
- **Provide access and security improvements to mark the boundaries of the Coke Point Landfill and restrict access to authorized users;**
- **Implement improved operating and waste management practices;**

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- **Provide waste characterizations to document compliance with acceptable waste disposal practices;**
- **Implement groundwater monitoring program;**
- **Evaluate options for control and monitoring of surface water runoff at potential outfall locations; and**
- **Provide slope stabilization and waste covering plan.**

## **BACKGROUND**

Coke Point Landfill is a solid waste disposal area located at the southern boundary of the Sparrows Point facility. The landfill area is approximately 46 acres that is located on made land comprised of slag and miscellaneous fill. Filling operations to form the land mass began in approximately 1952 and continued until approximately 1973 as determined by aerial photograph records. Topographic elevations of surrounding made land range from 2 to approximately 15 feet.

Waste disposal was initiated subsequent to formation of the land sometime in the early 1970's. The existing waste materials generally consist of debris from ironmaking and steelmaking operations and include construction and demolition debris. Wastes have been disposed in an irregularly shaped waste pile with topographic elevations ranging up to approximately 70 feet. A portion of the landfill footprint is also currently used for the storage of slag materials. Because of historical waste disposal activities, Coke Point Landfill has also been identified as a Special Study Area subject to corrective measures work as part of the Consent Decree.

Coke Point Landfill is currently utilized for the management of the following non-hazardous waste materials, annual waste quantities are expected to range between 25,000 to 75,000 cubic yards;

- Waste debris generated from the "rubble pit" associated with steelmaking operations at the Basic Oxygen Furnace;
- Waste slag debris from the slag skimmer bowl metal reclamation operations;
- General debris from the Sparrows Point facility that can be generated from industrial, construction, demolition and other activities occurring on the grounds of the facility;

Plans for a new landfill to be located proximate to Greys Landfill on the northern portion of the property have been finalized and the process of obtaining permits for this landfill is underway. It is a facility goal that waste management will occur solely at the new landfill and, once permitted and constructed, Coke Point Landfill will be phased out and secured. The compliance program outlined in this document provides operating practices for the current landfill operations.

In addition, the Maryland Port Authority (MPA) has expressed interest in acquiring portions of Coke Point for use as a dredged material containment facility. If this project moves forward, certain aspects of the operational measures outlined below (e.g., surface water runoff controls, slope stabilization, etc.) may need to be adjusted or amended to accommodate MPA's development plans.

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## **COMPLIANCE ACTION ITEMS**

### **Delineate the actual footprint of the Coke Point Landfill**

Drawing No. C-002, as included in the Coke Point Landfill Erosion/Sediment Control Plan Baltimore County, Maryland dated August 25, 2008, is an accurate topographic map that shows pertinent surrounding features and delineates the Coke Point Landfill boundary. This boundary will be used as the footprint (horizontal extent) of Coke Point Landfill for all future waste management activities. MDE confirmed during the meeting on May 26, 2010 that this drawing as previously submitted is acceptable for this action item.

### **Provide access and security improvements to mark the boundaries of the Coke Point Landfill and restrict access to authorized users**

Access control berms and gate access structures will be installed at the landfill to mark the boundaries of the Coke Point Landfill and restrict access to authorized users. Location(s) of the access/security improvements will either be installed at the landfill boundary or utilize existing topographic features to prevent unauthorized access. Berms will be of sufficient height and grade as to prevent vehicular access.

Construction of the access control berms is contemplated to be an activity that will not require an erosion and sediment control plan because of current site use for waste and slag management operations and perimeter stormwater management controls that are in place and monitored as part of the facility's NPDES permit. Upon MDE approval of this plan and associated construction activity without need for additional permitting, access and security improvements for the landfill will be completed within three months. Additional discussion of this projected schedule may need to occur as impacts to site resources are defined in the future that will be associated with the planned outage of steelmaking operations. The extent of the impact to site resources is not fully understood at this time.

### **Implement improved operating and waste management practices**

An updated and revised operations manual including associated drawings and waste management practice descriptions will be developed to support current and projected waste management activities at the landfill. The operations manual will include necessary information to address the following content requirements:

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## SITE INFORMATION

Responsible Officials  
Site Location  
Site Description  
Access Control

## DESCRIPTION OF SOLID WASTES

Types of Waste  
  
Anticipated Volumes  
Waste Sources and Service Areas

## DAILY OPERATIONS

Waste Handling and Cover Operations  
Grading and Drainage  
Personnel and Equipment  
Supervision  
Dust and Litter Control  
Safety Precautions  
Personnel Facilities  
Inspection and Solid Waste Compliance Program  
Scavenging or Salvaging  
Operational Restrictions

## MONITORING REQUIREMENTS

Groundwater Monitoring  
Surface Runoff  
Explosive Gases

The updated operating manual will be completed and submitted to MDE six weeks after approval of this plan. The manual will provide appropriate documentation of waste management and metal recovery practices that will occur within the footprint of the landfill and implementation schedules for associated improved operating practices.

### **Provide waste characterizations of refractory brick to document compliance with acceptable waste disposal practices**

An inventory of current types of refractory brick, location of use and typical quantity is currently being compiled. The inventory includes associated Material Safety Data Sheets for the manufacturer and brick type. Once the inventory is complete, an assessment will be conducted to document waste profiles, quantities and location of generation. This information will be forwarded to MDE within one month of approval of this updated compliance plan.

It is understood that more definitive waste determinations may be required in the future for as-generated waste refractory brick material. To support this request, laboratory characteristic testing may be conducted to support current applied knowledge assessments where appropriate in light of the process where the refractory brick was used.

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### **Implement groundwater monitoring program**

Groundwater monitoring will be implemented at Coke Point Landfill. As an initial phase for the monitoring program, existing groundwater monitoring wells will be identified that are properly located to assess groundwater conditions at the landfill. The process will include an assessment of the condition and accessibility of the monitoring wells. A report of the assessment and location map of the existing, suitable groundwater monitoring wells will be submitted within one month after approval of this updated compliance plan.

After completion of the inventory, a groundwater monitoring program will be implemented consistent with the process that has been completed at Greys Landfill. It is anticipated that the first quarterly sampling round will be conducted in the 3<sup>rd</sup> quarter of 2010, with sampling conducted at existing wells that are in proper condition. The program is understood to consist of quarterly groundwater monitoring for an initial year with submission of semi-annual reports. Adjustments to the program will be made as appropriate upon review of the results obtained for the initial year.

### **Evaluate options for control and monitoring of surface water runoff at potential outfall locations**

Current stormwater management practices at Coke Point Landfill include on-site retention and solids filtration. Stormwater is retained through the use of impervious dike structures that have been constructed in low areas susceptible to overland runoff. Solids filtration is accomplished with the use of gravel filter berms installed where potential runoff from access roads or the landfill could occur. Because of these controls, of which on-site retention is recognized as a preferred best management practice for stormwater control, stormwater runoff does not routinely occur that would allow for development of a monitoring program.

It is understood that when landfill facility improvements are designed and installed in the future, and if the improvements require stormwater outlet structures or outfalls, a sampling plan for this discharge point(s) will be implemented to monitor stormwater. The plan is expected to include locations of temporary or permanent surface runoff sampling locations on a scaled site map, methodology, frequency and proposed analytic methods. In addition, changes to the site stormwater controls will be included in a timely revision to the facility's NPDES Stormwater Pollution Prevention Plan.

### **Provide slope stabilization and waste covering plan**

Existing waste slopes at Coke Point Landfill are stable as documented by the absence of visual evidence of slope failure or slope movement. However, the current waste slopes are steeper than is appropriate for engineered landfills and will need to be modified to support the placement of stable intermediate or final cover materials.

An engineered plan will be developed to provide grading and waste cover at the landfill that meets the requirements of the Consent Decree as appropriate for the operation and capacity currently envisioned for Coke Point Landfill. A draft of the engineered plan will be available for MDE review

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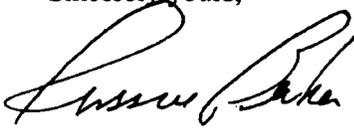
E: [russ.becker@severstalna.com](mailto:russ.becker@severstalna.com)

within three months of approval of this updated compliance program. After receiving feedback from MDE, the plan will also be submitted to Baltimore County Soil Conservation District (BCSCD) to gain approval for erosion and sediment controls necessary to support the defined construction effort. MDE will be kept apprised of the effort and schedule through monthly progress reports to obtain an approved plan from BCSCD.

A schedule to complete grading and waste cover activities will be developed once the extent of construction requirements is established based on receipt of an approved erosion and sediment control plan from BCSCD and approval from MDE.

Please contact me at (410) 388-6622 should you have questions regarding this submittal.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Russell Becker". The signature is fluid and cursive, with a large initial "R" and "B".

Russell Becker  
Division Manager  
Environmental Engineering and Affairs



November 16, 2011

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

Re: **Consent Decree, Civil Action Nos. JFM-97-558, JFM-97-559**  
***Coke Point Landfill Erosion and Sediment Control Report and Plan October 2011***

Dear Ms. Brown:

The referenced ***Coke Point Landfill Erosion and Sediment Control Report and Plan*** dated October 2011 was submitted to the Baltimore County Soil Conservation District (BCSCD) for their review on October 14, 2011. In addition, copies of these documents were hand delivered to the Department on November 8, 2011. This submittal is intended to satisfy the requirement to provide an engineered plan for slope stabilization requirements for the landfill as outlined in our correspondence dated June 25, 2010 as approved by the Department in September 2010. The engineered plans were discussed in draft with the Department in April 2011 and at the June 29, 2011 Joint Evaluation meeting. The Department will be kept apprised of the review status and schedule of the BCSCD review process.

Please contact me at (410) 388-6622 should questions arise during your review of the referenced information.

Sincerely,

A handwritten signature in black ink that reads "Russell Becker". The signature is written in a cursive, flowing style.

Russell Becker  
Division Manager, Environmental Engineering and Affairs