

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

SEVERSTAL SPARROWS POINT, LLC)	
)	
Petitioner,)	
)	
v.)	
)	
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, <i>et al.</i>)	Civil Action Nos. 97-cv-00558-JFM and 97-cv-00559-JFM
)	
Respondents.)	
)	

**STIPULATION AND ORDER ENTERING AGREEMENT
FOR OFF-SHORE SITE WIDE INVESTIGATION**

WHEREAS, Severstal Sparrows Point, LLC (now RG Steel Sparrows Point, LLC or “RG Sparrows”) petitioned this Court on August 3, 2010, for resolution of a dispute arising under the 1997 Consent Decree related to the off-shore portion of the site wide investigation (“SWI”) requirement of the Decree.

WHEREAS, this Court held two hearings related to the dispute and issued its Opinion and Order on July 5, 2011, which resolved the issues presented in the Petition.

WHEREAS, the July 5 Order directed the parties to “confer with one another and report back to me . . . as to whether they have been able to reach agreement as to the scope of the site wide investigation to be conducted at Severstal’s expense.”

WHEREAS, the United States Environmental Protection Agency (“EPA”), the Maryland Department of the Environment (“MDE”), and RG Sparrows have diligently complied with that Order and have conferred on numerous occasions over the past 5 months regarding the scope of the off-shore SWI.

WHEREAS the EPA, MDE, and RG Sparrows submitted a status report to the Court on December 15, 2011, and indicated in that report that those parties had reached an agreement on a framework for performance of the off-shore portion of the SWI.

WHEREAS, EPA and MDE stipulate that they will not seek reconsideration of the July 5, 2011 Opinion and Order of the Court in this matter.

IT IS HEREBY ORDERED as follows:

1. The agreement by and between RG Sparrows, EPA, and MDE is accepted by the Court and that agreement is memorialized in the *Framework for RG Steel Sparrows Point LLC Offshore Ecological and Human Health Investigation Portion of the Site Wide Investigation* (the "SWI Agreement"), attached to this Order as Exhibit 1.

2. Within 60 days of this Order, RG Sparrows shall submit to EPA and MDE for approval a workplan including a schedule for completion of the SWI in accordance with the terms outlined in the SWI Agreement.

3. This Court shall retain jurisdiction over submittal and approval of the workplan, until the workplan submitted pursuant to the SWI Agreement is approved by EPA and MDE.

4. Subject to and consistent with the Court's July 5, 2011 Opinion and Order, nothing herein shall otherwise alter or abridge the obligations and requirements of the Parties under the 1997 Consent Decree.

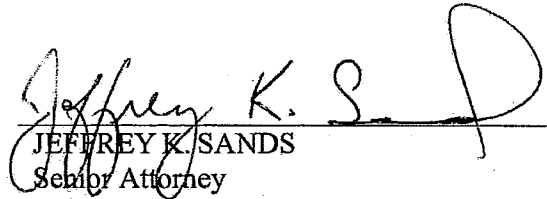
SIGNED this ____ day of _____, 201__.

J. Frederick Motz
United States District Judge

FOR PLAINTIFF THE UNITED STATES OF AMERICA:

12/23/2011
Date

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FOR THE STATE OF MARYLAND DEPARTMENT OF THE ENVIRONMENT:

12/27/11

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FOR RG STEEL SPARROWS POINT, LLC:

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12/22/11



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