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ISG Sparrows Point

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# Multimedia Consent Decree

## 2005 Annual Report

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

Prepared by  
ISG Sparrows Point



February 2006

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# 1.0 Introduction

This Annual Report is prepared in accordance with a Multimedia Consent Decree (Decree) that was originally entered into by Bethlehem Steel Corporation (BSC), the U.S. Environmental Protection Agency Region III (EPA) and Maryland Department of the Environment (MDE). The Decree was signed in February 1997, entered by the Court and became effective on October 8, 1997.

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

There are three sections in the Decree that require annual reporting of information;

Section VI	Paragraph 4	Waste Minimization Plan,
Section XII	Paragraph 5	Notification and Certification of Documents,
Section XVIII	Paragraph 2	Civil Penalties and Pollution Prevention Credits.

Section VI, Paragraph 4, (Waste Minimization Plan), requires a report on the previous year's status of implementing each Work Plan required under Section VI including sampling data related to hazardous waste regulatory determinations.

Section XII, Paragraph 5, Notification and Certification of Documents, requires a progress report on actions completed as required in Sections V (Corrective Measures Work) and VII (Compliance Requirements) of the Decree.

Annual reports of actual pollution prevention expenditures during the previous calendar year for pollution prevention projects described in Section VI are also required by Section XVIII, Paragraph 2, Civil Penalties and Pollution Prevention Credits.

This Annual Report provides information on actions undertaken in 2005 that complies with the requirements of these three paragraphs. Section 2.0 provides the status on the Waste Minimization Plan required in Section VI of the Decree and includes project cost information for the plan as required in Section XVIII. Sections 3.0 and 4.0 provide progress reports as required in Sections V (Corrective Measures) and Section VII (Compliance Requirements) respectively. Section 5.0 presents other supporting information required in Section XII including community relations, spill release reporting and changes to the overall management structure utilized by ISG Sparrows Point to implement the Decree.

## 2.0 Waste Minimization Plan

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

- Sump/Tank Work Plan
- Tin Mill Canal Discharge Report
- Strong Caustic Solution Reuse Work Plan
- Blast Furnace Gas Cleaning Slurry Recycle Work Plan
- Recycling of BOF Fume Sludge Work Plan
- Humphreys Creek Wastewater Treatment Plant Sludge Work Plan
- Dredging of the Tin Mill Canal Work Plan
- Facility Wide Waste Minimization Plan

A summary of the current status of these projects as of the year 2005 is presented in the following sections. To satisfy Decree Section XVIII on pollution prevention expenditures, each section also lists the costs incurred in 2004.

### Sump/Tank Work Plan

#### Description of 2005 Activity:

Repairs and/or replacements of sumps and storage tanks as specified in the Consent Decree and the approved "Sump/Tank Work Plan and Schedule" were completed in 2003.

Repairs completed for sumps and tanks included the following actions:

- Corrosion repair
- Repainting
- Replacement of structural tank supports and brick foundations
- Concrete joint repair within sumps
- Rubber liner repair for sumps and associated piping
- Installation of epoxy liners for trenches containing pickling acid solutions

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

2005 Expenditures:    \$0

### Tin Mill Canal Discharge Report

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

## **Strong Caustic and Spent Pickle Liquor Solution Reuse Work Plan**

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

## **Recycle of Blast Furnace Gas Cleaning Slurry Solids**

### **Description of 2005 Activity:**

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

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

**2005 Expenditures:**     \$0

## **Recycling of BOF Fume Sludge**

### **Description of 2005 Activity:**

Recycling of BOF fume sludge is currently being conducted at Sparrows Point. The use of processed BOF fume sludge referred to as RS was utilized in 2005 in amounts depending on the need of the BOF steelmaking operation. RS is a blend of sludge filter cake and slag; the recipe of the RS is adjusted according to the need for coolant for steelmaking.

Overall, approximately 8700 tons of RS were recycled for the year. The current practice is projected to continue in 2006.

**2005 Expenditures:**     \$84,400

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

### **Description of 2005 Activity:**

Technology review is ongoing to provide an evaluation of various processes to recycle the wastewater treatment plant sludge. An important milestone was achieved in 2004 when the new treatment plant was completed at the Humphreys Creek Wastewater

Treatment Plant. Sludge characteristics from this new plant are now being evaluated to determine their potential for recycling.

Off-site pilot testing was conducted in 2005 to determine the applicability of oil-removal processes for various site materials including mill scale. With removal of the oil content, specifications could be achieved for recycling of materials in the sinter making process at Sparrows Point. Thermal removal processes were evaluated with a successful removal of oil content from the mill scale. Current plans for 2006 include pilot testing of a recovery unit on-site that will remove oil from the mill scale and potentially the wastewater treatment plant sludge to permit recycling of the solids in the Sinter Plant. The projected program will evaluate performance and cost feasibility of this recycling process.

2005 Expenditures: \$0

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

### Description of 2005 Activity:

Maintenance dredging of the Tin Mill Canal was not conducted in 2005

2005 Expenditures: \$0

## **Facility Wide Waste Minimization Plan**

Goals and effectiveness of the Waste Minimization Program at Sparrows Point will continue to be evaluated as part of the requirements of the Consent Decree as well as with the environmental management system implemented at the facility in conjunction with the recent ISO 14001 certification received by the facility.

A comprehensive review of management of waste and by-product materials was initiated in 2005. This review is ongoing and expected to be completed in the first quarter of 2006. A summary of this program will be submitted as part of the requirements for the Facility Wide Waste Minimization Plan when it is completed.

## 3.0 Corrective Measures

Paragraph 5 of Section XII of the Decree requires a description of the work undertaken in Sections V (Corrective Measures) and VII (Compliance Requirements) of the Decree. This section provides a status report for corrective measures projects included in Section V of the Decree as follows:

- Rod & Wire Mill Sludge Bin Remediation Area
- Site Wide Investigation

### Rod & Wire Mill Sludge Bin Remediation Area

During 2005, ISG Sparrows Point Inc. operated the groundwater pump and treat Interim Measure at the former Rod & Wire Mill Sludge Bin Storage Area at Sparrows Point in accordance with the scope and schedule submitted in the July 2000 *Work Plan for Re-Establishment of Interim Measures, Former Sludge Bin Storage Area, Rod & Wire Mill* that was approved by U. S. EPA on November 3, 2000. The interim measure tasks included:

- Maintaining institutional controls at the former *in situ* leaching area
- Groundwater treatment system monitoring, operation and maintenance
- Semi-annual groundwater elevation monitoring
- Semi-annual sampling and analysis of groundwater.

Specifics of the interim measures tasks completed in 2005 are as follows:

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

A total of 5,659,233 gallons of water was extracted from the two Former Sludge Bin Storage Area groundwater pumping wells (RW15-PZM020 and RW10-PZM020) during 2005. The average pumping rate for the pump and treat system for 2005 was 15,505 gpd, or 10.8 gallons per minute (gpm). A total of 304 pounds

(lbs) of cadmium and 11,735 lbs of zinc was removed and treated from groundwater recovered from the Rod & Wire Mill area in 2005.

Groundwater elevation data indicate groundwater drawdown within a radius of influence that effectively captures the contamination plume in the intermediate groundwater zone (approximately 20 to 30 feet below the ground surface) at the established pumping rates of approximately 5.7 and 5.0 gallons per minute (gpm), respectively, for recovery wells RW15-PZM020 and RW10-PZM020. The groundwater elevation data for the shallow zone (groundwater table surface to 15 feet in depth) also document water table drawdown that is effectively controlling contamination in this groundwater zone. Groundwater elevation data for the deeper groundwater zone (greater than 50 feet in depth) continues to be inconclusive with regard to influence from the pump and treat system.

Groundwater monitoring data collected during 2005 suggest improvements in groundwater quality at select locations as compared to 2004. Regarding cadmium, groundwater quality appears to have improved at: RW01-PZM020, RW02-PZM020, and RW13-PZM020. Regarding zinc, groundwater quality appears to have improved at RW13-PZM020.

The Proposed Operating Plan for 2006 is to: maintain institutional controls at the former storage area, continue operation, maintenance, and monitoring of the groundwater pump and treat system and complete semi-annual monitoring of groundwater consistent with procedures outlined in the approved July 2000 Work Plan.

## Site Wide Investigation

Work completed for the Site Wide Investigation during 2005 included the following activities:

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

Work completed in 2005 for the Nature & Extent Work Plan included the following major events:

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



- Comments were received from the US EPA for the Nature and Extent Report on December 15, 2005. These comments are being reviewed for a response in 2006. At that point, it is anticipated that a review meeting will be held to discuss next steps for the Site Wide Investigation.

#### Human Health Environmental Indicator Program

As part of a cooperative effort with the agencies, ISG Sparrows Point completed a program in 2005 to assess current human health exposures at the facility with respect to the requirements outlined in RCRA Corrective Action Environmental Indicator RCRIS Code (CA 725). Work completed in 2005 associated with this program included the following:

- A Workplan to Evaluate Current Human Exposures was developed and submitted for approval on October 28, 2004.
- Preliminary approval was granted by the agencies in a conference call held December 15, 2004 to review the submitted Workplan. A follow-up letter was provided by the agencies confirming the approval on January 11, 2005.
- Data collection, including groundwater, surface water, and soil media was conducted from March through May 2005;
- Presentation of facility investigation and human health risk evaluation findings was made to the agencies on June 9, 2005;
- Comments were received from the agencies and a conference was held on July 18, 2005 to review the comments. Based on resolved issues, a revised RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA 725) form was submitted for review on July 29, 2005;
- Additional comments were received from the agencies on August 4 and August 25, 2005. Revised versions of the CA 725 form were sent on August 16 and August 31, 2005;
- Confirmation was received from the agencies on September 1, 2005 that the evaluation of current human exposures at the facility was complete. The facility obtained a "yes" status or determination which indicates that there are no unacceptable human exposures to contamination that can be reasonably expected under current land- and groundwater-use conditions.

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

- Workers/Surface Soil section--Remove impacted materials exposed at the surface and cover the work area with slag as outlined in the approved CA725 document (Revision 5, August 30, 2005);

- Indoor air sampling from the occupied buildings of concern in the Coke Oven Area.

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

#### Ecological Risk Assessment Program

An ecological risk assessment program for the facility was developed and presented to the agencies on November 21, 2005. Various tasks were completed to develop the approach including an ecological reconnaissance that was completed by risk assessment personnel in May 2005. The purpose of the reconnaissance was to collect observational data on ecological resources, native habitats, and potential contaminant migration and exposure pathways.

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

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

- Incorporation of impacts associated with The Maryland Port Administration's plans to potentially utilize portions of the Patapsco River at Sparrows Point for placement of dredge spoils. Consequently, development of a separate Work Plan to address off-site exposures and risks may be necessary based on the nature and timing of Port plans.

A strategy document for the ecological risk assessment tasks at Sparrows Point is currently being prepared for submittal to the agencies for approval in early 2006. Site visits will be coordinated subsequent to that submittal in accordance with proper seasons for completion of required activities.

## 4.0 Compliance Requirements

Paragraph 5 of Section XII of the Consent Decree requires a description of the work undertaken in Sections V (Corrective Measures) and VII (Compliance Requirements) of the Decree. Projects included in Section VII are as follows:

- Visible Emissions from BOF Shop Roof Monitor
- Kish Reduction
- Coke Point and Greys Landfill Operation

### Visible Emissions from BOF Shop Roof Monitor

Monitoring records for the compliance requirements for visible emissions from the Basic Oxygen Furnace (BOF) Shop roof monitor during 2004 have been attached in Appendix A. Monitoring was conducted in accordance with the requirements outlined in the Maryland State Implementation Plan (SIP) that was promulgated by the State of Maryland on 10/2/2000 and approved by the US EPA on 11/6/2001 as provided for in Section VII Paragraph A.4. and Section XVII 1.c. of the Consent Decree. With approval of the SIP by the US EPA, compliance requirements for visible emissions from the BOF Shop roof monitor are now implemented by requirements of the SIP and not the Consent Decree.

### Kish Reduction

In August of 2003, the Skimmer Slag Ladle Dumping Process was relocated to the No.2 Soaking Pit Building located northeast of the Caster. This structure provides cover that controls and significantly reduces fugitive kish emissions from the dumping of slag ladles from the slag skimming operation. The project development included access to the structure by extension of slab hauler road. The south side of the building was altered to provide direct access to the facility. Additional wall sheeting, lighting, fire protection, internal grading and ramps for dumping were required for the process at a cost in excess of \$125,000. Additional improvements to the No. 2 Soaking Pit Building were completed in 2004 including the installation of a fabricated wall sheet to close in the east side of the building and further minimize fugitive emissions from the building. The cost of this project was approximately \$80,000.

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

### Coke Point and Greys Landfill Operation

The Consent Decree required the preparation of a landfill operations plan and an engineering plan for Greys Landfill and Coke Point Landfill (Landfill Compliance Plan). The Landfill Compliance Plan was submitted on July 15, 1998. The Consent Decree also

required the submittal of a plan and timetable for future uses and closure of the landfills. This document was prepared and submitted by BSC on April 8, 1999. Activities conducted in 2004 for the landfill were as follows:

#### Greys Landfill

The approved engineering compliance Improvements at Greys Landfill were initiated in 2005. Field activities began subsequent to notice on June 30, 2005 and included stockpiling of required clean fill for the project.

Additional site activities including contractor mobilization followed by clearing and grubbing, erosion and sediment control and landfill stabilization activities began on January 3, 2006. Progress meetings for the project will be scheduled to be held with representatives of MDE as appropriate.

#### Coke Point Landfill

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

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

## 5.0 Decree Management Reporting

### Project Management

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

A Community Commitment Initiative meeting was held at the Sparrows Point facility on December 6, 2005. Community groups that were represented, amongst others included:

- North Point Community Coordinating Council
- Greater Dundalk Alliance
- Turner Station Community Association
- Inverness Community Association

An environmental summary of activities at the facility was presented. This summary included a discussion of various components of the Consent Order, including RCRA Corrective Action tasks and Compliance requirements. It is anticipated that the next community information meeting will be held in the first or second quarter of 2006.

### Release Reporting

Appendix B contains spill reports for the facility that were reported in 2005. These reports document the status of mitigation of the releases, and the government oversight agency, contact name and telephone number.

**APPENDIX A      BOF SHOP ROOF MONITOR RECORDS**

# BOF Roof Monitor Visible Emission Report

Report Time Period Selection

Beginning Date:   Ending Date:

Date of Observation	Observed 6 Minute Value	Rolling 3-day Average	Observer
01/03/05	3.3	1.9	Campeggi
01/04/05	1.9	1.7	Campeggi
01/05/05	2.1	2.4	Campeggi
01/07/05	0.6	1.5	Campeggi
01/10/05	0.0	0.9	Kolb
01/11/05	0.0	0.2	Kolb
01/14/05	4.8	1.6	Kolb
01/17/05	0.0	1.6	Campeggi
01/18/05	2.3	2.4	Campeggi
01/19/05	1.0	1.1	Campeggi
01/25/05	2.9	2.1	Kolb
01/26/05	1.7	1.9	Kolb
01/27/05	8.5	4.4	Kolb
02/01/05	0.8	3.7	Campeggi
02/02/05	1.3	3.5	Campeggi
02/03/05	6.3	2.8	Campeggi
02/08/05	0.0	2.5	Kolb
02/09/05	8.5	4.9	Kolb
02/10/05	22.3	10.3	Kolb
02/15/05	1.5	10.8	Campeggi
02/16/05	1.5	8.4	Campeggi
02/21/05	6.0	3.0	Kolb
02/22/05	4.0	3.8	Kolb
02/23/05	6.9	5.6	Kolb
02/25/05	3.8	4.9	Kolb
02/28/05	0.0	3.6	Campeggi
03/01/05	4.2	2.7	Campeggi
03/02/05	0.8	1.7	Campeggi
03/07/05	0.0	1.7	Kolb
03/08/05	5.8	2.2	Kolb
03/09/05	5.8	3.9	Kolb
03/15/05	0.0	3.9	Campeggi
03/16/05	1.3	2.4	Campeggi



03/17/05	3.5	1.6	Campeggi
03/22/05	1.5	2.1	Kolb
03/23/05	9.8	4.9	Kolb
03/24/05	0.8	4.0	Kolb
03/29/05	0.6	3.7	Campeggi
03/30/05	0.0	0.5	Campeggi
04/05/05	2.1	0.9	Kolb
04/06/05	2.9	1.7	Kolb
04/07/05	0.0	1.7	Kolb
04/08/05	0.0	1.0	Kolb
04/12/05	3.5	1.2	Campeggi
04/13/05	1.0	1.5	Campeggi
04/14/05	0.8	1.8	Campeggi
04/19/05	0.0	0.6	Kolb
04/20/05	1.0	0.6	Kolb
04/21/05	2.7	1.2	Kolb
04/25/05	1.0	1.6	Campeggi
05/03/05	2.1	1.9	Kolb
05/04/05	0.0	1.0	Kolb
05/05/05	0.0	0.7	Kolb
05/06/05	0.0	0.0	Kolb
05/10/05	1.7	0.6	Campeggi
05/11/05	1.5	1.1	Campeggi
05/12/05	0.0	1.1	Campeggi
05/13/05	0.0	0.5	Campeggi
05/24/05	5.2	1.7	Campeggi
05/25/05	2.5	2.6	Campeggi
05/26/05	0.0	2.6	Campeggi
05/31/05	0.6	1.0	Kolb
06/01/05	0.4	0.3	Kolb
06/02/05	2.7	1.2	Frushour
06/06/05	1.9	1.7	Campeggi
06/10/05	0.0	1.5	Campeggi
06/14/05	0.4	0.8	Kolb
06/15/05	0.6	0.3	Kolb
06/16/05	3.1	1.4	Kolb
06/20/05	0.0	1.2	Campeggi
06/23/05	0.0	1.0	Campeggi
06/24/05	1.7	0.6	Campeggi
06/28/05	4.6	2.1	Kolb
06/29/05	1.0	2.4	Kolb

06/30/05	0.4	2.0	Kolb
07/06/05	0.0	0.5	Campeggi
07/07/05	7.1	2.5	Campeggi
07/08/05	2.1	3.1	Campeggi
07/12/05	0.0	3.1	Kolb
07/13/05	9.6	3.9	Kolb
07/14/05	2.1	3.9	Kolb
07/19/05	3.5	5.1	Campeggi
07/20/05	0.0	1.9	Campeggi
07/21/05	4.0	2.5	Campeggi
07/26/05	2.7	2.2	Kolb
07/27/05	0.8	2.5	Campeggi
07/28/05	0.0	1.2	Campeggi
08/02/05	1.0	0.6	Campeggi
08/03/05	0.0	0.3	Campeggi
08/04/05	3.1	1.4	Campeggi
08/09/05	2.9	2.0	Kolb
08/10/05	1.7	2.6	Kolb
08/11/05	0.0	1.5	Kolb
08/15/05	0.0	0.6	Campeggi
08/16/05	1.3	0.4	Campeggi
08/19/05	1.0	0.8	Campeggi
08/23/05	0.0	0.8	Kolb
08/24/05	6.5	2.5	Kolb
08/25/05	9.8	5.4	Kolb
08/30/05	1.0	5.8	Campeggi
08/31/05	3.3	4.7	Campeggi
09/01/05	2.7	2.3	Campeggi
09/06/05	0.0	2.0	Kolb
09/07/05	1.5	1.4	Kolb
09/08/05	1.0	0.8	Kolb
09/13/05	0.4	1.0	Campeggi
09/14/05	0.0	0.5	Campeggi
09/16/05	5.2	1.9	Campeggi
09/20/05	1.5	2.2	Kolb
09/21/05	7.1	4.6	Kolb
09/22/05	16.5	8.4	Kolb
09/27/05	5.6	9.7	Campeggi
09/28/05	7.9	10.0	Campeggi
09/29/05	1.0	4.8	Campeggi
10/04/05	3.8	4.2	Kolb

10/05/05	0.0	1.6	Kolb
10/06/05	5.8	3.2	Kolb
10/11/05	1.7	2.5	Campeggi
10/12/05	2.3	3.3	Campeggi
10/13/05	2.1	2.0	Campeggi
10/18/05	0.0	1.5	Kolb
10/19/05	0.0	0.7	Kolb
10/20/05	4.2	1.4	Kolb
10/24/05	2.1	2.1	Campeggi
10/25/05	0.8	2.4	Campeggi
10/28/05	4.8	2.6	Campeggi
11/01/05	7.5	4.4	Campeggi
11/02/05	7.1	6.5	Kolb
11/03/05	6.3	7.0	Kolb
11/08/05	2.1	5.2	Campeggi
11/09/05	5.6	4.7	Campeggi
11/10/05	0.8	2.8	Campeggi
11/15/05	0.0	2.1	Kolb
11/16/05	0.0	0.3	Kolb
11/17/05	6.3	2.1	Kolb
11/21/05	0.0	2.1	Campeggi
11/22/05	0.8	2.4	Campeggi
11/23/05	0.4	0.4	Campeggi
11/29/05	0.0	0.4	Kolb
11/30/05	1.5	0.6	Kolb
12/01/05	1.5	1.0	Kolb
12/13/05	0.0	1.0	Campeggi
12/14/05	1.0	0.8	Campeggi
12/15/05	0.6	0.5	Campeggi
12/20/05	10.8	4.1	Kolb
12/21/05	0.0	3.8	Kolb
12/22/05	0.4	3.7	Kolb
12/27/05	0.0	0.1	Campeggi
12/28/05	0.8	0.4	Campeggi
12/29/05	5.4	2.1	Campeggi

**APPENDIX B      RELEASE REPORTING RECORDS**



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

**February 9, 2005**

**CERTIFIED RETURN RECEIPT REQUESTED**

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

Dear Mr. Sonberg:

This letter and will serve as the monthly spill report for ISG Sparrows Point LLC. for the month of January 2005. There were no spills during the month.

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

Sincerely,

Robert J. Abate  
Manager Safety, Health, and Environment

**Attachment**

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



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

March 14, 2005

**CERTIFIED RETURN RECEIPT REQUESTED**

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

Dear Mr. Sonberg:

This letter, and its attachment, will serve as the monthly spill report for ISG Sparrows Point LLC. for the month of February 2005. There were two spills during the month.

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

Sincerely,

Robert J. Abate  
Manager Safety, Health, and Environment

Attachment

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

## Attachment 1

Date/Time – 2/15/05 at approximately 1625 hours  
Amount – 10 gallons  
Spilled to – Ground  
Material Spilled – Diesel Fuel  
Location – Truck Dock 285A

On February 15, 2005, at approximately 1625 hours a spill of about ten gallons of diesel fuel occurred at Truck Dock 285A in the Continuous Caster Area. All of the fuel was contained on the ground and none entered any storm drain or water body.

Our investigation revealed that at the time of the incident a mobile fuel tanker was preparing to fuel a piece of portable power equipment. When the pump was started the fuel dispensing hose ruptured and the spill ensued. The fuel tanker operator immediately shut down the pump and summoned help. While waiting for help he used dirt and slag to berm the spilled fuel to prevent it from migrating.

Haas Environmental supplied a vacuum truck to remove the standing liquid and our Mobile Equipment Department provided a payloader to remove the contaminated soil. The liquid was recycled via Kroff, our on site oil recycler, and the contaminated ground was given to A&A Environmental for stabilization.

All existing dispensing hoses on the fuel tanker were removed and replaced with new ones.

Date/Time – 2/19/05 at approximately 1100 hours  
Amount – 30 gallons  
Spilled to – 20 gallons Outfall 001 and 10 gallons to ground  
Material Spilled – Hydraulic oil  
Location – Pennwood Power Station

On February 19, 2005, at approximately 1100 hours, about 40 gallons of Hydraulic oil was spilled at the Pennwood Power Station No. 4 Boiler east induced draft fan. Approximately 30 gallons entered a drain that emptied into Outfall 001 and the remainder was contained on the ground at the base of the fan. The oil at Outfall 001 remained primarily behind the containment boom at the end of the outfall.

Our investigation revealed that at the time of the spill the east induced draft fan on No. 4 Boiler was under repair. The fan had received initial repairs, was started and tested, and was found to be in need of additional repairs. The fan assembly was taken apart and during inspection the repair forces noted debris in the hydraulic oil reservoir. It was then decided to change out the lube oil.

There is approximately 250 gallons of hydraulic oil in the fan system. The oil is changed by first draining the reservoir by using the unit's auxiliary oil pump to pump the oil into drums and the refilling the reservoir with fresh oil. A crew, consisting of several individuals, was assigned to change the oil. The breaker which controls the electrical feed to the auxiliary oil pump is located remotely from the pump. Therefore, one individual was assigned to operate the breaker while the remaining individuals conducted the oil change.

The oil change procedure requires close communication between crew members as the oil auxiliary oil pump only operates when it senses low oil pressure inside the fan assembly. In this case, since the lubrication system was down, the low pressure sensor would start the auxiliary pump immediately after being energized. The job procedure called for one individual to throw the breaker for the auxiliary oil pump when the crew was in place and all preparations had been made to facilitate the oil change. However, the procedure was not followed. The breaker was turned on and the auxiliary oil pump began pumping oil before the crew had made all the necessary preparations to catch the oil and thus the spill ensued.

Almost immediately after the breaker was switched on, the crew observed the oil emanating from the unit and they called for the breaker to be turned off. Efforts were made to contain the oil but, as noted above, some of the oil had reached the drain. A2Z Environmental was called to the scene and recovered the oil at the containment boom and Onyx Precision Services was dispatched to clean up the oil on the ground.

As a result of the spill we have done the following.

- The oil change procedure has been reviewed and updated as necessary.
- The revised procedure has been reviewed with all of the operating and electrical personnel who were involved in the incident and all who might do the job in the future.
- The procedure has been attached to each breaker that controls an auxiliary oil pump, a total of eight units.





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

**April 4, 2005**

**CERTIFIED RETURN RECEIPT REQUESTED**

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

Dear Mr. Sonberg:

This letter will serve as the monthly spill report for ISG Sparrows Point LLC. for the month of March 2005. There were no spills during the month.

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

Sincerely,

Robert J. Abate  
Manager Safety, Health, and Environment

Attachment

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



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

May 27, 2005

**CERTIFIED RETURN RECEIPT REQUESTED**

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

Dear Mr. Sonberg:

This letter will serve as the monthly spill report for ISG Sparrows Point LLC. for the month of April 2005. There were no spills during the month.

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

Sincerely,

Robert J. Abate  
Manager Safety, Health, and Environment

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



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

**June 7, 2005**

**CERTIFIED RETURN RECEIPT REQUESTED**

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

Dear Mr. Sonberg:

This letter will serve as the monthly spill report for ISG Sparrows Point LLC. for the month of May 2005. There were no spills during the month.

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

Sincerely,

Robert J. Abate  
Manager Safety, Health, and Environment

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



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

**July 14, 2005**

**CERTIFIED RETURN RECEIPT REQUESTED**

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

Dear Mr. Sonberg:

This letter will serve as the monthly spill report for ISG Sparrows Point LLC. for the month of June 2005. There were no spills during the month.

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

Sincerely,

Robert J. Abate  
Manager Safety, Health, and Environment

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



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

**August 16, 2005**

**CERTIFIED RETURN RECEIPT REQUESTED**

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

Dear Mr. Sonberg:

This letter will serve as the monthly spill report for ISG Sparrows Point LLC. for the month of July 2005. There were no spills during the month.

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

Sincerely,

Robert J. Abate  
Manager Safety, Health, and Environment

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



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

September 26, 2005

**CERTIFIED RETURN RECEIPT REQUESTED**

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

Dear Mr. Sonberg:

This letter will serve as the monthly spill report for ISG Sparrows Point LLC. for the month of August 2005. There were no spills during the month.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert J. Abate', written in a cursive style.

Robert J. Abate  
Manager Safety, Health, and Environment

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



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

**October 27, 2005**

**CERTIFIED RETURN RECEIPT REQUESTED**

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

Dear Mr. Sonberg:

This letter, and its attachment, will serve as the monthly spill report for ISG Sparrows Point LLC. for the month of September 2005. There was one spill during the month.

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

Sincerely,

Robert J. Abate  
Manager Safety, Health, and Environment

**Attachment**

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

Mr. Greg Sonberg – October 27, 2005

Date/Time – 9/30/05 at approximately 0800 hours

Amount – 25 gallons

Spilled To – Outfall 001

Material Spilled – Exxon GT 32 lubrication oil

Location – Pennwood Power Induced Draft Fan 1B

On September 30, 2005, during his normal rounds, the power house utility man found that the oil in the reservoir for No. 1B induced draft fan was low. Low oil in the reservoir could be the result of an oil cooler leak.

The outfall was checked and a small amount of oil was observed contained behind the outfall containment boom. A2Z Environmental was dispatched to the outfall at approximately 0805 hours and arrived at approximately 0830 hours.

Sorbent was deployed into the outfall to absorb the oil and a vacuum truck was also used to recover floating product. When the recovery process was complete, an additional sorbent boom was installed upstream of the outfall as a precautionary measure.

The National Response Center, United States Coast Guard and the Maryland Department of the Environment were notified of the spill. The NRC assigned Case Number 774479 to the incident. The Coast Guard responded to the spill area and had no problem with our cleanup efforts.

We have assigned a Corrective and Preventative Action Request (CPAR) to this incident. The CPAR requires that the power house personnel determine the cause of the spill and develop corrective measures to prevent a recurrence.





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

November 22, 2005

**CERTIFIED RETURN RECEIPT REQUESTED**

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

Dear Mr. Sonberg:

This letter will serve as the monthly spill report for ISG Sparrows Point LLC. for the month of October 2005. There were no spills during the month.

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

Sincerely,

Robert J. Abate  
Manager Safety, Health, and Environment

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



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

December 13, 2005

**CERTIFIED RETURN RECEIPT REQUESTED**

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

Dear Mr. Sonberg:

This letter, and its attachment, will serve as the monthly spill report for ISG Sparrows Point LLC. for the month of November 2005. There was one spill during the month.

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

Sincerely,

Robert J. Abate  
Manager Safety, Health, and Environment

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

Mr. Greg Souberg – December 13, 2005

Date/Time – 11/17/05 at approximately 0550 hours

Amount – Approximately 40 gallons

Spilled To – Ground

Material Spilled – Diesel Fuel

Location – Slab Hauler Road just east of the Continuous Caster

On November 17, 2005, at approximately 0550 hours, two slab haulers collided on Slab Hauler Road just east of the Continuous Caster. The crash severed a fuel line on one of the haulers resulting in a loss of approximately 40 gallons of diesel fuel to the ground. No sewers or waterways were involved in the incident.

Supervision was notified of the incident, by radio, and dispatched a repair team to the area immediately. Upon arrival, the team installed a catch pan beneath the broken fuel line and spread speedi-dri on the spilled diesel fuel to contain it. When the damaged slab hauler was moved a payloader picked up the spilled fuel and contaminated soil and it was taken to Kroff Chemical for stabilization and disposal.

Our investigation revealed that there was operator error on the part of both slab hauler drivers that contributed to the accident and spill. Upon completion of the investigation process both drivers will receive disciplinary action. All other slab hauler operators have been made aware of the details concerning this incident.



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

**January 3, 2005**

**CERTIFIED RETURN RECEIPT REQUESTED**

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

Dear Mr. Sonberg:

This letter will serve as the monthly spill report for ISG Sparrows Point LLC. for the month of December 2005. There were no spills during the month.

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

Sincerely,

Robert J. Abate  
Manager Safety, Health, and Environment

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