



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

SEP 2 2010

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Russell Becker
Program Manager
Environmental Engineering & Affairs
Severstal Sparrows Point
1430 Sparrows Point Blvd
Sparrows Point, MD 21219

Subject: Coke Oven Area Interim Measures Work Plan Supplemental Information June 2010
and Approval of Severstal's Interim Measures Work Plan for the Coke Oven Area

Dear Mr. Becker:

Pursuant to Consent Decree, Docket No. JFM-97-558 & JFM-97-559, ("CD") EPA hereby approves the subject work plan, titled "Coke Oven Area Interim Measures Work Plan Supplemental Information, June 2010," submitted to EPA on June 18, 2010. Severstal submitted the Supplemental Information in response to EPA's letter of May 26, 2010, which in turn had outlined the reasons EPA had disapproved Severstal's previous submission of the work plan, dated April 2, 2010. Based on EPA's review of the June 18, 2010 Supplemental Submission and the June 3, 2010 phone discussion among the parties to the CD, EPA has determined that Severstal has adequately revised the work plan to satisfy EPA's conditions for approval of the interim measures work plan. Under the terms of the work plan Severstal will construct six remediation cells in phases, in accord with the schedule set forth below and with all cells being completed on or before July 3, 2011. The remediation cells shall employ multiple technologies (groundwater pumping, product skimming, groundwater injection, soil vapor extraction, air sparging, and/or enhanced biodegradation) singly or in combination in accordance with the work plan to reduce the source of the plume and control its movement:

The Cells shall be completed and operational in accord with the work plan and the following schedule:

Cell 1 –Cell 1 is already operational;

Cell 2 –After completion of the groundwater treatability study to be undertaken during September-October 2010, Severstal shall submit its proposed final design for Cell 2 with modification as deemed appropriate by EPA based on performance evaluation of Cell 1 by November 30, 2010. Severstal shall complete construction and begin operation of Cell 2 by July 3, 2011;

Cell 3 - Severstal shall submit its proposed final design for Cell 3 with modification as deemed appropriate by EPA based on performance evaluation of Cell 1 by November 30, 2010. Severstal shall complete construction and begin operation of Cell 3 by July 3, 2011;

Cell 4 – Severstal shall submit its proposed final design for Cell 4 by December 31, 2010, and complete construction and begin operation of Cell 4 by February 28, 2011;

Cell 5 –After completion of the groundwater treatability study to be undertaken during September-October, 2010, Severstal shall propose a final design for Cell 5 by January 15, 2011. Severstal shall complete construction and begin operation of Cell 5 by July 3, 2011.

Cell 6 Severstal shall, at a minimum, undertake the following: (1) Construct additional monitoring wells to further delineate the extent of floating product in the Benzol Processing Area; (2) Identify, convert or construct additional skimmer wells to optimize product recovery, and (3) Evaluate groundwater depression pumping and dual phase extraction to optimize product recovery if the existing skimming operation becomes inefficient.

In order to meet the design and construction schedule for each Cell, Severstal must determine what types, if any, of local, State and Federal permits are required for each Cell. The system will require an application for a groundwater discharge permit from the State of Maryland for the pump and treat systems proposed for Cell 2 and Cell 5 and potentially for the bioaugmentation planned for Cell 4 (see <http://www.mde.state.md.us/assets/document/permit/MDE-WMA-PER013.pdf>). The discharge permitting process may require 6 to 7 months to complete, including public notification requirements. Severstal should begin the permit application process in a timely manner to meet the construction deadlines. Severstal may provide preliminary design information on the permit application to initiate the permit review process prior to the design submittal deadlines outlined above. Treated groundwater must meet the MCLs for all contaminants prior to discharge to the infiltration gallery.

Severstal will also be required to obtain a ground water appropriations permit from the State of Maryland. The permit application process will vary depending on whether the system's average annual withdrawal exceeds 5,000 gallons per day (gpd), is between 5,000 and 10,000 gpd or exceeds 10,000 gpd. The permit application review process may require up to 5 months to be completed if the withdrawal exceeds 10,000 gpd. Additional information on the groundwater appropriations permit process and a link to the required forms can be found at:

<http://www.mde.maryland.gov/assets/document/permit/2008PermitGuide/WMA/3.15.pdf>

Severstal shall submit monthly progress reports by the last day of each month beginning October 2010 on the performance of each completed cell that is in operation. Severstal shall include in these reports all efforts it has taken to optimize skimming recovery for Cell 6.

Please call me at (215) 814-3426 if you have technical questions regarding this matter. For legal questions, please have your attorney contact Susan Hodges, Senior Assistant Regional Counsel at (215)814-2643 or Charles Howland, Senior Assistant Regional Counsel, at (215)814-2645.

Sincerely,



Andrew Fan, Project Manager
Land and Chemicals Division

cc: Barbara Brown, MDE