



Severstal Sparrows Point LLC
1430 Sparrows Point Boulevard
Baltimore, Maryland 21219

January 27, 2010

Received

FEB 1 2010

Mr. Edwal Stone, Program Manager
Wastewater Permits Program
Water Management Administration
Maryland Department of the Environment
1800 Washington Blvd.
Baltimore, Maryland 21230



Re: Required Corrective Actions and Recommendations
MDE Field Inspection Report by Shailaja Polasi dated December 21, 2009
MDE Field Inspection Report by Clay Troy dated January 8, 2010
NPDES Permit No. 90-DP-0064, MD0001201 and 97-DP-0064, MD0068462

Dear Mr. Stone:

Enclosed please find our responses to the required corrective actions and recommendations that were identified in the referenced field inspection reports received by Severstal Sparrows Point on December 21, 2009 and January 8, 2010 respectively. Efforts outlined in the following responses provide required corrections for potential compliance deficiencies associated with implementation of the SWPPP that were noted by compliance inspections performed by the Water Management Administration. In addition, the annual Comprehensive Site Compliance Evaluation required for the SWPPP as outlined in Special Condition Y.3.c. of the referenced permit is attached as a reference to this submittal.

For convenience, the required corrective action or recommendation is included in italics followed by our response. In several responses we are requesting additional information or guidance from the Department to satisfy the requested corrective action.

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Responses and/or corrective actions completed in response to the MDE Field Inspection report by Shailaja Polasi dated July 28, 2009 (page 11)

1. *"The permittee should start reporting the exact calculated value for the monthly average concentrations on the DMRs."*

Exact calculated values for the monthly average concentrations are currently reported on the DMRs for average value calculations for which all data has actual values above the laboratory reporting limit. Reporting procedures have also been developed for utilizing less than reporting conventions for average value calculations that include data reported as less than the laboratory reporting limit. Additional guidance is requested from MDE for acceptable exact value reporting convention protocol for average value calculations that include data reported as less than the laboratory reporting limit.

2. *"The permittee should make sure the lab reports the concentrations below the detection limit as less than detection limit."*

This issue has been discussed with our contract laboratory and future lab reports will not contain estimated concentrations (J qualified results) that are below the reporting limit. Results less than detection limit will be reported as "less than detection limit" only.

3. *"The above mentioned findings for the period of review should be corrected."*

Severstal is requesting clarification of the exact findings that should be corrected for the period of review.

4. *"The above mentioned findings for the storm water inspection should be corrected."*

Severstal is requesting clarification of the exact findings that should be corrected for the storm water inspection. Housekeeping items identified in the inspection report have been addressed.

5. *"The chain of custody sheet should be filled completely with the initial sample collection time, date, operator initial, intermediate and final relinquished date and times".*

Chain of custody sheets have been developed that support the requested clarifications. The new chain of custody sheets are currently in use. The custody sheets will include space to completely fill out all information and will include the preservatives used for each sample.

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6. *"The permittee should notify the Department the procedure followed in updating the SWPPP and SPCC Plan and provide the date and year when the plans (SWPPP and SPCC) were updated."*

SWPPP

The procedure used to update the SWPPP plan is the Comprehensive Site Compliance Evaluation required under Special Condition Y 3.c. of the referenced permit. Included in the Comprehensive Site Compliance Evaluation are the following:

- Review of Facility Site Inspections
- Description of Potential Pollutant Sources (both Severstal and Tenant Operations)
- Updated Stormwater Drainage Map
- Evaluation of Stormwater Controls
- Site Compliance
- Recommendations for Improvements

The Comprehensive Site Compliance Evaluation is completed annually; the 2009 update is attached with this correspondence. Any recommendations contained in the report will be addressed during 2010 as part of our routine inspection and compliance program.

SPCC Plan

The SPCC Plan is reviewed by Severstal on an annual basis and updated as needed. The most recent update to the plan occurred on December 22, 2009.

7. *"The SWPPP and SPCC plan should be updated with the team members and the emergency contact list and telephone numbers"*

The SWPPP and SPCC emergency contact list and telephone numbers are updated as information changes. The last update of emergency contacts for the SWPPP occurred on September 22, 2009 and for the SPCC Plan on December 22, 2009.

8. *"The SWPPP should be updated to include the drainage area of the stormwater from the coal yard storage area."*

The 2009 SWPPP Comprehensive Site Compliance Evaluation (attached) required under Special Condition Y 3.c of the permit includes an updated drainage area map. This updated drainage area map includes the coal yard storage area.

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9. *"The units on the pH circular chart in use should be updated to the units in the permit to read the recorded ph without error."*

Units on the pH circular chart in use at the Blast Furnace/Sinter Plant Wastewater Treatment Plant have been modified to read the recorded pH without error.

10. *"The operator should document the reason for the breakage in the continuous recording on the ph and flow chart. The reason can be documented in the daily log book or on the chart with the date, time and the operator initials."*

Operators have been instructed to provide the required information for a breakage in recording data on the back of the chart or in a logbook with the date, time, and operator initials.

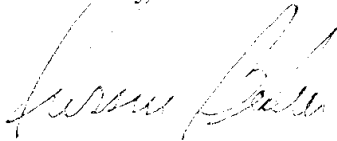
Corrective actions completed in response to the MDE Field Inspection report by Clay Troy dated January 8, 2010

The inspection report noted that most corrective actions listed on previous inspections (report of October 22, 2009) have been satisfactorily addressed and the site condition was noted as mostly satisfactory.

The additional corrective action noted in the MDE Field Inspection report dated January 8, 2010 (requiring that the height of the noted section of gravel filter berm is to be increased to match the height of the connecting gravel filter berms) was completed on January 12, 2010. It is our understanding that completion of this item corrects the outstanding NPDES Industrial Stormwater Permit inspections identified by MDE.

If you have questions regarding this response, please contact me at (410) 388-6622.

Sincerely,



Russell Becker
Division Manager,
Environmental Engineering & Affairs

Cc: Barbara Brown, MDE

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