

ISG Sparrows Point

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# Multimedia Consent Decree

## 2003 Annual Report

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

Prepared by  
ISG Sparrows Point



February 2004

*Russ Becker*  
410 388 6622

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# MultiMedia Consent Decree

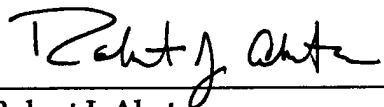
## Document Certification

### *Multimedia Consent Decree*

### *2003 Annual Report*

February 13, 2004

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



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Robert J. Abate  
Manager  
Safety, Health and Environment

ISG Sparrows Point

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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. ISG Sparrows Point Division is currently operating the Sparrows Point facility in Baltimore County, Maryland (the "Facility" as defined by the Consent Decree) and 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 2003 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 Inc. 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 2003 is presented in the following sections. To satisfy Decree Section XVIII on pollution prevention expenditures, each section also lists the costs incurred in 2003.

### Sump/Tank Work Plan

#### Description of 2003 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 2002.

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 that are required on a tri-annual basis (Section VI 3.c.). The next update will be provided in April of 2005.

2003 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 2003 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 achieved by 2005.

**2003 Expenditures:**     \$0

## **Recycling of BOF Fume Sludge**

### **Description of 2003 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 throughout 2003 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 8200 tons of RS were recycled for the year. This usage rate provided recycling and reuse of approximately 20% of the BOF fume sludge filter cake for the year. Currently, approximately 20% of the BOF fume sludge filter cake is being recycled with increases in the recycle rate projected for later in 2004.

**2003 Expenditures:**     \$42,000

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

### **Description of 2003 Activity:**

Technology review is ongoing to provide an evaluation of various processes to recycle the wastewater treatment plant sludge. An important milestone will be achieved in

2004 when the new treatment plant comes on-line at the Humphreys Creek Wastewater Treatment Plant. Sludge characteristics from this new plant will be evaluated in 2004 to determine their potential for recycling.

2003 Expenditures: \$0

## Maintenance Dredging of the Tin Mill Canal

### Description of 2003 Activity:

Maintenance dredging operations were conducted in late 2003 that included the removal of approximately 500 cubic yards of material from a location in Tin Mill Canal near the sewer outlet of the Hot Strip Mill. The Sludge Drainage Pad was used for temporary storage and dewatering of the material. Testing procedures for this material will be completed in 2004 prior to disposal to provide waste characterization of the materials. Sampling procedures will include the recovery of discrete random and composite samples of the waste materials. Toxicity characteristic leaching procedure analyses will be completed for the recovered samples to document the presence of parameters that exceeded hazardous waste regulatory limits.

2003 Expenditures: \$25,000

## Facility Wide Waste Minimization Plan

ISG will continue to implement the Facility Wide Waste Minimization Plan. The goal of this plan is to identify, if possible, ways to further reduce the volume, mobility and/or toxicity of solid wastes, hazardous wastes, and hazardous constituents generated at the Facility.

The Plan submitted in 1999 included both waste minimization projects associated with the Consent Decree as well as numerous voluntary waste minimization programs. Major components of this plan were completed prior to 2001. As required by the Decree, a triannual review and assessment of the effectiveness of this plan was conducted in 2002. The review report was submitted to the agencies on April 10, 2002.

Goals and effectiveness of the Waste Minimization Program at Sparrows Point will continued 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.

## 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

This remediation activity is an ongoing Interim Measure that has been included in the Consent Decree. A groundwater treatment facility was constructed in 1986 in response to a site investigation of a cadmium and zinc contaminated area near the Rod and Wire Mill. Groundwater pumping and treatment was conducted from 1987 to 1998. The groundwater pumping was discontinued and the treatment plant dismantled in 1999 to support a demolition project at the Rod and Wire Mill and to allow for reassessment of the interim measure. Sampling and reassessment of this interim measure was conducted in 1999 and 2000.

Interim Measures at the former Rod & Wire Mill Sludge Bin Storage Area were re-established in 2000 and 2001, including activities to establish institutional controls around the former in-situ leaching area, upgrade the groundwater monitoring network, perform water-level and water-quality monitoring, and install a groundwater pump-and-treat system.

BSC and ISG Sparrows Point completed operation and maintenance requirements for the Interim Measure in 2003. A separate annual report is required for this interim measure. Detailed information about sampling, analytical results and trends are found in these reports. The reassessment report for 2003 was submitted on schedule on January 30, 2004 and outlined the following findings:

- 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 implementation of an authorization program to conduct work in the area;
- Operation and maintenance of the groundwater treatment process equipment was performed for the groundwater extraction wells, transfer pipeline and treatment equipment;
- Evaluation of the groundwater pump and treat system was completed, including: 1) documentation of treatment flow, 2) review of monthly groundwater elevation data, and 4) review of effectiveness;
- Semi-annual sampling, analysis and evaluation of the groundwater was completed on schedule;

A total of 5,109,003 gallons of water were extracted from the two groundwater pumping wells during 2003. The average pumping rate for the pump and treat system for 2003 was 13,997 gallons per day, or 9.7 gallons per minute (gpm). A total of 357 pounds (lbs.)



of cadmium and 15,375 lbs. of zinc was removed and treated from the Rod & Wire Mill area in 2003.

Groundwater elevation data document drawdown within a radius of influence that effectively captures the contamination plume in the intermediate groundwater zone at the Rod & Wire Mill Sludge Bin Remediation Area. Groundwater elevation data for the shallow zone also document groundwater drawdown that is effectively controlling contamination in this groundwater zone. Groundwater elevation data for the deeper groundwater zone is inconclusive with regard to influence from the pump and treat system.

Groundwater monitoring data collected during 2003 did not indicate significant changes in groundwater quality as compared to 2002.

The Proposed Operating Plan for 2004 is to continue operation, maintenance, and monitoring of the groundwater pump and treat system and semi-annual monitoring of groundwater.

## Site Wide Investigation

Work completed for the Site Wide Investigation during 2003 included the following activities:

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

A work plan was developed and submitted (July 1, 2002) that delineated the scope and schedule for investigation procedures to be implemented to define the horizontal and vertical extent of hazardous constituents in the groundwater system impacted by releases from the Special Study Areas. As a result of discussions and comments received from the agencies during review meetings, an addendum to the work plan was prepared and submitted on September 30, 2002. The US EPA approved the work plan, and subsequent addendum, on October 9, 2002.

The installation of additional groundwater monitoring wells for the special study areas was initiated in December 2002 and completed in March 2003. The investigation program included specific groundwater monitor well installation tasks as outlined in the nature and extent work plan. In addition, sampling and analysis of groundwater was conducted during the well installation program.

### Work Authorized by ISG

Transfer of ownership of the Facility to ISG Sparrows Point occurred on May 8, 2003. Work completed in 2003 for the Site Wide Investigation subsequent to this ownership transfer has consisted of: evaluation and selection of qualified contractors, review of the data associated with the Site Wide Investigation, performance of an Agency Introduction Meeting, and field work associated with the review and development of a site-wide groundwater conceptual model. The following table presents dates and significant tasks that have been completed in 2003 subsequent to the transfer of ownership.

06/11/2003	URS Qualifications Presentation to ISG at Sparrows Point
06/19/2003	Site Visit
07/02/2003	URS Presentation at Sparrows Point
07/18/2003	Submittal of Proposal to conduct Initial Scope of Services
07/30/2003	Kick-off meeting at Sparrows Point
10/7-8/2003	Groundwater monitoring well inventory
10/16/2003	Submittal of project master schedule to ISG
11/19/2003	Agency Introduction Meeting
12/19/2003	Site-wide groundwater well level measurements
12/22/2003	Completion of groundwater/surface water data logging

Certain delays were experienced in 2003 concerning the schedule and completion of the Nature and Extent Work Plan. These delays were associated with the sale of the facility to ISG Sparrows Point Inc. and expected transition actions that occurred with the sale. A meeting was held on November 19, 2003 to introduce ISG Sparrows Point Inc. and its' selected contractors to the Agencies, discuss the progress made for the Site Wide Investigation in 2003 and propose a path forward. It was agreed by parties at the meeting that follow-up presentations of data collected in 2003 and proposed modifications to the work plan would be presented by ISG in February of 2004.

For 2004, it is anticipated that work will proceed on the Site Wide Investigation in accordance with work plan modifications and schedules proposed by ISG that have been approved by the agencies.

## 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 2003 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

The Kish Reduction Work Plan was submitted for review and approval on January 6, 1998. MDE returned detailed comments to the plan on February 20, 1998. A revised plan was submitted by BSC in August 1998. Approval was received from the Agencies on December 1, 1999.

A supplemental Work Plan to Evaluate the Control of Kish Emissions from BOF Slag Skimmer Ladle Dumping was submitted by BSC to MDE on June 1, 2001. This work plan identified objectives and procedures to evaluate possible solutions to control specific kish emissions from the dumping of slag ladles from the slag skimming operation. The Work Plan Report was finalized and submitted to the Maryland Department of the Environment on March 27, 2002.

A study was performed to define the scope, cost and schedule to relocate the desulfurizer skimmer kish bowl dumping into various underutilized structures at the facility. Details of this study were provided in a correspondence to MDE on November 20, 2002.

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.

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.

Updated engineering drawings and the associated closure plan for Greys Landfill were submitted to MDE for review on April 10, 2002. Modified drawings for engineering improvements that were approved by the Baltimore County Soil Conservation District were submitted for review on July 8, 2002. Comments on the engineering drawings and closure plan were received from MDE on August 14, 2002. Responses to the comments were prepared and submitted by BSC on August 30, 2002.

Activities completed in 2003 included:

- A meeting was held at MDE in January 2003 to review the comments and responses of the engineering drawings and closure plan for Greys Landfill.
- A Hydrologic Evaluation of Landfill Performance (HELP) analysis was performed for closure cap designs for Greys Landfill and submitted on February 11, 2003.
- Comments were received from MDE on March 11, 2003 concerning the HELP analysis and final construction drawings for Greys Landfill.
- Revised closure plans, project specifications and project engineering drawings for Greys Landfill were submitted by ISG Sparrows Point Inc. to MDE for review and approval on October 10, 2003.

Activities planned for 2004 for Coke Point and Greys Landfills include the following:

- Obtain approval of the closure and engineering plans for Greys Landfill from MDE;
- Obtain corporate funding, complete contractor selection and begin work on the engineering improvements at Greys Landfill
- Initiate engineering analysis of the Coke Point Landfill area, including slope stability investigations and landfill improvement designs;

## 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 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.

### Release Reporting

Appendix B contains spill reports for the facility that were reported in 2003. 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:

March

2003

Ending Date:

April

2003

Date of Observation	Observed 6 Minute Value	Rolling 3-day Average	Observer
01/02/03	2.3	1.5	Campeggi
01/03/03	0.2	1.0	Campeggi
01/07/03	1.9	1.5	Kolb
01/08/03	8.1	3.4	Kolb
01/09/03	2.9	4.3	Kolb
01/14/03	0.0	3.7	Campeggi
01/15/03	1.5	1.5	Campeggi
01/16/03	2.1	1.2	Campeggi
01/21/03	0.0	1.2	Kolb
01/22/03	2.9	1.7	Kolb
01/23/03	0.8	1.2	Kolb
01/28/03	7.9	3.9	Campeggi
01/29/03	0.0	2.9	Campeggi
01/31/03	15.4	7.8	Campeggi
02/04/03	0.4	5.3	Kolb
02/05/03	1.9	5.9	Kolb
02/06/03	1.9	1.4	Kolb
02/11/03	0.4	1.4	Campeggi
02/12/03	0.6	1.0	Campeggi
02/13/03	2.7	1.2	Campeggi
02/19/03	0.8	1.4	Kolb
02/20/03	0.6	1.4	Kolb
02/21/03	0.2	0.5	Kolb
02/25/03	3.5	1.4	Campeggi
02/26/03	6.5	3.4	Kolb
02/27/03	0.8	3.6	Campeggi
03/04/03	0.0	2.4	Kolb
03/05/03	1.7	0.8	Kolb
03/07/03	0.6	0.8	Kolb
03/11/03	3.5	1.9	Campeggi
03/12/03	0.0	1.4	Campeggi
03/13/03	5.6	3.0	Lang

03/18/03	0.0	1.9	Kolb
03/19/03	4.4	3.3	Kolb
03/20/03	5.2	3.2	Kolb
03/25/03	6.9	5.5	Campeggi
03/26/03	1.5	4.5	Campeggi
03/27/03	0.0	2.8	Campeggi



ISG Sparrows Point, Inc.  
BOF Roof Monitor Observations - Second Quarter 2003

<u>Date</u>	<u>Observed</u>	<u>Rolling 3 Day</u>	<u>Observer</u>
	<u>6 Minute Average</u>	<u>Average</u>	
4/1/2003	0.6	0.7	Kolb
4/2/2003	0.0	0.2	Kolb
4/3/2003	1.3	0.6	Kolb
4/8/2003	1.0	0.8	Campeggi
4/9/2003	1.7	1.3	Campeggi
4/10/2003	2.1	1.6	Campeggi
4/15/2003	0.6	1.5	Kolb
4/16/2003	2.1	1.6	Kolb
4/18/2003	6.0	2.9	Kolb
4/22/2003	0.0	2.7	Campeggi
4/23/2003	0.0	2.0	Campeggi
4/25/2003	0.4	0.1	Campeggi
4/29/2003	3.3	1.2	Kolb
4/30/2003	0.0	1.2	Kolb
5/1/2003	4.8	2.7	Kolb
5/6/2003	4.0	2.9	Campeggi
5/7/2003	0.0	2.9	Campeggi
5/8/2003	3.5	2.5	Campeggi
5/13/2003	0.6	1.4	Kolb
5/14/2003	0.2	1.4	Kolb
5/15/2003	2.5	1.1	Kolb
5/20/2003	1.7	1.5	Campeggi
5/21/2003	0.0	1.4	Campeggi
5/22/2003	0.6	0.8	Campeggi
5/28/2003	1.7	0.8	Kolb
5/29/2003	3.8	2.0	Kolb
5/30/2003	1.7	2.4	Kolb
6/2/2003	0.0	1.8	Campeggi
6/3/2003	0.6	0.8	Campeggi
6/6/2003	0.4	0.3	Campeggi
6/10/2003	0.8	0.6	Kolb
6/11/2003	1.0	0.7	Kolb
6/12/2003	0.4	0.7	Campeggi
6/17/2003	0.6	0.7	Campeggi
6/18/2003	0.0	0.3	Campeggi
6/19/2003	0.2	0.3	Janssen
6/24/2003	3.3	1.2	Kolb
6/25/2003	1.5	1.7	Kolb
6/26/2003	1.7	2.2	Kolb

# BOF Roof Monitor Visible Emission Report

Report Time Period Selection

Beginning Date:

July 2003

Ending Date:

September 2003



Date of Observation	Observed 6 Minute Value	Rolling 3-day Average	Observer
07/01/03	0.2	1.1	Campeggi
07/02/03	0.8	0.9	Campeggi
07/03/03	0.0	0.3	Campeggi
07/07/03	0.6	0.5	Kolb
07/08/03	0.0	0.2	Kolb
07/11/03	0.0	0.2	Kolb
07/15/03	1.5	0.5	Campeggi
07/16/03	0.0	0.5	Campeggi
07/17/03	1.3	0.9	Campeggi
07/22/03	6.7	2.7	Kolb
07/23/03	4.4	4.1	Kolb
07/24/03	0.0	3.7	Kolb
07/29/03	6.3	3.6	Campeggi
07/30/03	4.4	3.6	Campeggi
07/31/03	0.6	3.8	Campeggi
08/05/03	0.8	1.9	Kolb
08/06/03	0.4	0.6	Kolb
08/07/03	1.7	1.0	Kolb
08/12/03	0.8	1.0	Campeggi
08/13/03	0.0	0.8	Campeggi
08/14/03	6.3	2.4	Campeggi
08/19/03	0.2	2.2	Kolb
08/20/03	1.9	2.8	Kolb
08/22/03	1.5	1.2	Kolb
08/26/03	0.0	1.1	Campeggi
08/27/03	1.9	1.1	Campeggi
08/28/03	0.6	0.8	Campeggi
09/02/03	0.0	0.8	Kolb
09/03/03	0.0	0.2	Kolb
09/04/03	3.5	1.2	Kolb
09/09/03	1.0	1.5	Kolb
09/10/03	1.0	1.8	Campeggi

09/11/03	0.0	0.7	Campeggi
09/16/03	1.7	0.9	Kolb
09/17/03	15.6	5.8	Kolb
09/18/03	2.1	6.5	Kolb
09/30/03	0.0	5.9	Campeggi

# BOF Roof Monitor Visible Emission Report

Report Time Period Selection

Beginning Date:

October 2003

Ending Date:

December 2003

Date of Observation	Observed 6 Minute Value	Rolling 3-day Average	Observer
10/02/03	0.0	0.8	Campeggi
10/07/03	1.0	1.1	Kolb
10/08/03	3.1	1.4	Kolb
10/09/03	4.6	2.9	Kolb
10/14/03	0.6	2.8	Campeggi
10/15/03	8.3	4.5	Kolb
10/16/03	12.5	7.1	Bonanno
10/21/03	2.3	7.7	Kolb
10/22/03	1.5	5.4	Kolb
10/23/03	5.0	2.9	Kolb
10/28/03	3.1	3.2	Campeggi
10/29/03	2.5	3.5	Campeggi
10/30/03	1.3	2.3	Campeggi
11/03/03	0.4	1.4	Campeggi
11/04/03	0.0	0.6	Frushour
11/07/03	1.3	0.6	Kolb
11/11/03	2.7	1.3	Campeggi
11/12/03	10.8	4.9	Campeggi
11/13/03	3.8	5.8	Campeggi
11/18/03	2.9	5.8	Kolb
11/19/03	5.4	4.0	Kolb
11/20/03	1.3	3.2	Kolb
11/24/03	1.3	2.7	Campeggi
11/25/03	0.6	1.1	Campeggi
11/26/03	1.9	1.3	Campeggi
12/02/03	7.3	3.3	Kolb
12/04/03	2.9	4.0	Kolb
12/05/03	4.0	4.7	Kolb
12/09/03	6.0	4.3	Campeggi
12/10/03	3.3	4.4	Janssen
12/11/03	0.8	3.4	Campeggi
12/16/03	1.5	1.9	Kolb

12/17/03	0.0	0.8	Kolb
12/19/03	1.3	0.9	Kolb
12/22/03	0.0	0.4	Campeggi
12/23/03	0.0	0.4	Campeggi
12/26/03	0.8	0.3	Campeggi
12/30/03	3.5	1.4	Kolb
12/31/03	1.5	1.9	Kolb

**APPENDIX B**

**RELEASE REPORTING RECORDS**

# Bethlehem Steel Corporation

SPARROWS POINT DIVISION  
5111 NORTH POINT BOULEVARD  
BALTIMORE, MARYLAND 21219-1014



April 11, 2003

## **CERTIFIED RETURN RECEIPT REQUESTED**

Mr. Greg Sonberg  
Maryland Department of the Environment  
Hazardous and Solid Waste Administration  
Montgomery Park Business Center  
1800 Washington Blvd. Suite 620  
Baltimore, Maryland 21230-1708

Dear Mr. Sonberg:

This letter and its attachments will serve as the required spill report for the Sparrows Point Division for the First Quarter of 2003.

If there are any questions, please refer them to Mr. Joseph Dolan, of my staff, at 410-388-5991 and discuss them with him.

Sincerely,

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

Robert J. Abate  
Manager, Safety, Health, and Environment

### Attachments

cc: SPCC Plan  
EPA OPA Plan  
M. S. Vogler  
J. E. Schindler  
File

**Attachment**

**Date/Time** – February 4, 2003 at unknown time  
**Amount** – Approximately 20 gallons to ground  
**Spilled To** – Ground  
**Material Spilled** – Dexron Hydraulic Oil  
**Location** – Coke Point

On the morning of February 5, 2003 a mobile equipment operator, who works at Coke Point, reported to his supervisor that several pieces of mobile equipment had been vandalized during the previous night. Vandals had started a bulldozer and pushed a G880 GradeAll over on its side and damaged several other pieces of equipment.

When the GradeAll was turned over it was damaged and approximately 20 gallons of Dexron hydraulic fluid leaked onto the ground. None entered any sewer or waterway. A vacuum truck was summoned to the area and removed the standing oil and recycled it through an on site oil recycler. A payloador followed and scooped up the contaminated soil which was subsequently sent off site to an approved disposal facility.

The incident was reported to the Sparrows Point Police Department and their investigation yielded no witnesses or suspects.

**Date/Time** – February 13, 2003 at approximately 0530 hours  
**Amount** – Approximately one quart  
**Spilled To** – Outfall 001  
**Material Spilled** – Diesel Fuel  
**Location** – Hub Refueling Station

This spill was reported to the Department because it occurred on Bethlehem property and was from Bethlehem equipment. However, subsequent investigation by the United States Coast Guard ruled that the incident was not the fault of Bethlehem. A copy of their letter of warning to the responsible party is attached.

**Date/Time** – February 23, 2003 at 0900 hours  
**Amount** – Approximately 150 gallons to ground  
**Spilled To** – Ground  
**Material Spilled** – Diesel Fuel  
**Location** – Truck Dock 164 at the New Cold Mill

A report on this spill was sent to you on April 2, 2003 and a copy is attached.



U.S. Department of Transportation  
United States Coast Guard



PCN: 033-03

# LETTER OF WARNING

Coast Guard Unit Address  
Activities Baltimore  
2401 Hawkins Point Rd.  
Baltimore, MD 21228  
Phone: (410)578-2883  
FAX: (410)578-2588

Date and time of Violation:  est./ known] NRC case # 636710

Location of Violation	Water body: Upper Patapsco River	City: Baltimore	State: MD
<b>Party in Violation</b>			
Name: Clifton R. Scott	Title: PIC	Vessel Name: N/A	
Mailing Address: 2800 Reiserstown Road		Vessel # N/A	
		Facility Name: Bethlehem Steel - Sparrows Pt.	
City: Baltimore	State: MD	Zip: 21215	Party involved:
Country: USA	Telephone: 410-488-6298		

## Discharge Violation

<u>Regulation</u> 33USC1321(b)(3)	<u>Nature of Violation</u> Discharge of oil.	<u>The Estimated Volume</u> <1 quarts
--------------------------------------	---	--

Owner,  Operator, or  Person in charge was found in Violation of:

I observed a/  sheen  film on  a navigable water of the U.S.  
 It was reported a/  sludge  emulsion  an adjoining shoreline.

**Incident Description:** Person in charge walked away from an ongoing fuel transfer which subsequently overfilled & caused diesel fuel to enter into a navigable waterway (Patapsco River) through a storm drain.

**Special Requirements:** Maintain an alert & uninterrupted watch during all fuel transfer operations to prevent any further discharges into the environment.

This Letter of Warning does not absolve you of your responsibility to clean up the discharge as directed by the Federal On-Scene coordinator (FOSC). If you fail to take action satisfactory to the FOSC or if you decide to refuse this Letter of Warning, a Notice of Violation or Civil Penalty Case will be initiated against you.

A civil penalty of up to \$11,000 could be assessed for this violation. However, due to the circumstances of this incident it is determined that a Letter of Warning would be as effective as a monetary penalty. This letter will be retained by the Coast Guard and may be used as evidence should you be found responsible for any future violations.

Issued by: Zane Peter Peter Date/Time: 06Mar03/1400

Received and Acknowledged: Clifton R. Scott Date/Time: 3-11-03 6:18 AM

# Bethlehem Steel Corporation

SPARROWS POINT DIVISION  
5111 NORTH POINT BOULEVARD  
BALTIMORE, MARYLAND 21219-1014



April 2, 2003

## **CERTIFIED RETURN RECEIPT REQUESTED**

Mr. Richard Collins  
Maryland Department of the Environment  
Hazardous and Solid Waste Administration  
Montgomery Park Business Center  
1800 Washington Blvd. Suite 610  
Baltimore, Maryland 21230-1708

Dear Mr. Collins:

At approximately 0900 hours on March 23, 2003 a spill of approximately 150 gallons of diesel fuel was discovered on the ground near a portable air compressor located at Truck Dock 164 at the New Cold Mill building. None of the diesel fuel entered any plant sewer or any body of water.

When the spill was discovered our Mobile Equipment repair force was contacted and sent a repairman to inspect the compressor. The repairman reported that there was no leakage of diesel fuel or motor oil found anywhere on the compressor. He also arranged for the movement of the compressor to a concrete containment area nearby. Additionally, a Grade-All was called to the site to excavate the contaminated soil. The soil was placed into a dumpster box and will be shipped to an approved off site disposal facility.

We suspect that the unit was overfilled during a fueling operation sometime between March 21 and March 23. However, there were no witnesses to this and the personnel responsible for fueling the compressor during those days do not admit to overfilling the unit.

To prevent a recurrence several things have been done. The incident has been discussed with personnel who refuel portable equipment and the proper procedure for the fueling operation has been reviewed as well. The circumstances surrounding the incident, including the causes and corrective measures, have been discussed with plant management.

Mr. Richard Collins - April 2, 2003

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

Sincerely,

A handwritten signature in black ink, appearing to read "R. Abate", with a long horizontal line extending to the right.

Robert J. Abate  
Manager, Safety, Health, and Environment

cc: SPCC Plan  
EPA OPA Plan  
M. S. Vogler  
J. E. Schindler  
File



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

**July 17, 2003**

**CERTIFIED RETURN RECEIPT REQUESTED**

Mr. Jonas Jacobson  
Maryland Department of the Environment  
Hazardous and Solid Waste Administration  
Montgomery Park Business Center  
1800 Washington Blvd. Suite 610  
Baltimore, Maryland 21230-1708

Dear Mr. Jacobson:

This letter will serve as the required spill report for ISG Sparrows Point Inc. for the Second Quarter of 2003. There were no spills during the quarter.

If there are any questions, please refer them to Mr. Joseph Dolan, of my staff, at 410-388-5991 and discuss them with him.

Sincerely,

Robert J. Abate  
Manager, Safety, Health, and Environment

cc: SPCC Plan  
EPA OPA Plan  
M. S. Vogler  
File



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

**October 29, 2003**

**CERTIFIED RETURN RECEIPT REQUESTED**

Mr. Jonas Jacobson  
Maryland Department of the Environment  
Hazardous and Solid Waste Administration  
1800 Washington Boulevard Suite 610  
Baltimore, Maryland 21230-1708

Dear Mr. Jacobson:

This letter, and attachments, will serve as the spill report for ISG Sparrows Point Inc. for the Third Quarter of 2003. There were two spills during the quarter. A report for the spill of September 2, 2003 has been sent to you and is also attached along with the report for the September 30, 2003 spill.

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

Attachments

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

**Spill Report ISG Sparrows Point Inc. – Third Quarter 2003**

**Date/Time** – September 30, 2003

**Amount** – One Half Gallon

**Spilled To** – Ground

**Material Spilled** – Spent Pickler Liquor

**Location** – Acid Alley

On September 30, 2003, during a routine preventative maintenance inspection, several pipefittings on the piping servicing the waste acid sump in acid alley were observed to be leaking. Operations was immediately contacted and the piping was shut down shortly thereafter. Approximately one half gallon of acid was spilled to the ground. None reached any sewer or body of water.

When the piping was secured A 2 Z Environmental was called to the scene to effect cleanup. A 2 Z neutralized the acid with soda ash and removed the residue and contaminated soil. The material was placed into two drums and will be shipped off site to an appropriate disposal facility as soon as arrangements can be made. The leaking piping was disassembled and scrapped. New piping was installed, tested, and placed into



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

**September 23, 2003**

**CERTIFIED RETURN RECEIPT REQUESTED**

Mr. Jonas Jacobson  
Maryland Department of the Environment  
Hazardous and Solid Waste Administration  
1800 Washington Boulevard Suite 610  
Baltimore, Maryland 21230-1708

Dear Mr. Jacobson:

On September 2, 2003 a spill of approximately 50 gallons of hydraulic oil was discovered contained by our permanent boom at Outfall 001. A small amount of sheen had escaped the boom and was found floating in Old Road Bay. Initial investigation of the sources leading to Outfall 001 did not indicate any flowing oil at that time.

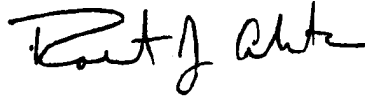
A2Z Environmental was dispatched to the outfall and using a boat, sorbent materials, and a vacuum tanker, removed the bulk of the oil from within the containment area. Prior to leaving for the day they deployed sorbent material inside of the containment boom to capture any oil that remained. The sorbent was subsequently removed and the cleanup was deemed complete.

Further investigation revealed that at the time of the spill the Scrap Baler building was in the process of being demolished. It was learned that an underground potable water line had ruptured and flooded the basement of the building. We believe that the oil may have originated from the basement of the baler. The oil most likely floated on top of the floodwaters and entered a sump pump discharge pipe that had been sheared off during demolition. This pipe lead to a sewer that discharged to the outfall. Both A2Z and A&A Environmental vacuum equipment and manpower were used to remove the oil from the flooded basement of the baler. The hydraulic oil tanks in the basement had been cleaned and removed prior to the flood.

The basement will be further cleaned and backfilled as demolition progresses. Additionally, we will seal the sump pump pipe with concrete or other suitable material prior to the basement being backfilled.

Mr. Jonas Jacobson - September 23, 2003

Sincerely,

A handwritten signature in black ink, appearing to read "Robert J. Abate". The signature is written in a cursive style with a large initial "R".

Robert J. Abate  
Manager Safety, Health, and Environment

cc: M. S. Vogler