

March 29, 2012

Mr. Andrew Fan  
US EPA Region III, 3WC23  
1650 Arch Street  
Philadelphia, PA 19103-2029

Ms. Barbara Brown  
Project Coordinator  
Maryland Department of the Environment  
1800 Washington Blvd.  
Baltimore, Maryland 21230

**Re: Consent Decree, Civil Action Nos. JFM-97-558, JFM-97-559**  
***Coke Oven Area Interim Measures Progress Report February 2012***

Dear Mr. Fan and Ms. Brown:

Enclosed with this correspondence is the ***Coke Oven Area Interim Measures Progress Report February 2012*** completed for the RG Steel Sparrows Point Facility in accordance with the requirements outlined in US EPA's September 2, 2010 approval letter for the Coke Oven Area Interim Measures work associated with the referenced Consent Decree. This report was distributed electronically on March 30, 2012 in accordance with the outlined reporting requirements; this correspondence provides paper copies for your use.

The report summarizes implementation progress for the approved interim measures (IMs) that have been developed to address identified environmental conditions at the Coke Oven Area through February 29, 2012.

Please contact me at (410) 388-6622 should questions arise during your review of the enclosed progress report.

Sincerely,



Russell Becker  
Division Manager, Environmental Engineering and Affairs

Enclosure

# COKE OVEN AREA INTERIM MEASURES PROGRESS REPORT (FEBRUARY 2012)

*Prepared for*

RG Steel Sparrows Point, LLC  
Sparrows Point, Maryland



March 30, 2012

# URS

URS Corporation  
12420 Milestone Center Drive, Suite 150  
Germantown, MD 20876  
Project no. 15302745

# **Coke Oven Area Interim Remedial Measures Progress Report**

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## **Introduction**

In accordance with the United States Environmental Protection Agency's (US EPA)'s September 2, 2010 letter, this document is the monthly progress report for February 2012 for the US EPA-approved interim measures (IMs) that have been developed to address identified environmental conditions at the Coke Oven Area (COA) Special Study Area at the RG Steel Sparrows Point Facility (formerly Severstal Sparrows Point Facility) located in Sparrows Point, Maryland. This progress report summarizes IM progress for February 2012.

For mutual ease of understanding, and as agreed during the June 3, 2010 teleconference with US EPA, the following designations are applied in this document to the six (6) IM "Cells" (**Figure 1**) at the COA:

- Cell 1: Prototype Air Sparge/Soil Vapor Extraction (AS/SVE) System in the Former Benzol Processing Area,
- Cell 2: AS/SVE and Dual Phase Groundwater Extraction System in Former Coal Storage Area,
- Cell 3: AS/SVE System in "Cove" Area,
- Cell 4: In-Situ Anaerobic Bio-treatment Area,
- Cell 5: Groundwater Extraction at the Turning Basin Area, and
- Cell 6: Light Non-Aqueous Phase Liquid (LNAPL) Recovery at the Former Benzol Processing Area.

As of February 29, 2012, Cells 1, 3, 4 and 6 continue to be operational. The fourth amendment dosing event at Cell 4 occurred from February 14 to 16, 2012. The remaining Cells (Cells 2 and 5) are in various stages of evaluation, design, and under permitting considerations by Maryland Department of the Environment (MDE).

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### **Cell 1: Prototype AS/SVE System in the Former Benzol Processing Area**

Cell 1 consists of a prototype IM, which includes AS/SVE coupled with vapor destruction via an electric catalytic oxidation (CATOX) unit. **Figure 2** shows the system layout of Cell 1 and locations of the major design components including the air sparging wells and vapor collection trenches.

#### **February 2012 Operational Performance**

Operational performance of Cell 1 during this reporting period is summarized in **Table 1**. In summary, the CATOX unit operated for 693 hours (99.6 %) during this reporting period. Operations were in conformance with the manufacturer's specifications at all times that soil gases were collected in accordance with the May 20, 2011 modified permit-to-construct conditions.

The hydrocarbon removal rate was calculated to be approximately 0.07 pounds per operating hour (estimated monthly total of 48.1 pounds). **Table 1** also includes a cumulative summary of operational performance since system startup on August 3, 2010. In total, Cell 1 has destroyed approximately 9,157 pounds of recovered hydrocarbons. **Figure 3** presents a graph of the cumulative estimated monthly hydrocarbon recovery in Cell 1 since the startup of the IM system.

Soil gas samples were collected for laboratory and/or field instrument (e.g., photoionization detector [PID]) analysis to monitor CATOX unit performance. One (1) untreated soil gas sample was collected in a Tedlar® bag and submitted to TestAmerica Laboratories, Inc. in Knoxville, Tennessee (TestAmerica) for analysis by US EPA Method TO-15. The influent soil gas hydrocarbon concentration collected on February 17, 2012 was 79.9 parts per million by volume (ppmv) as summarized in **Table 2**.

On February 15, 2012, a leak due to a detached vacuum extraction header piping joint was detected and fixed. It is likely that this leak had existed since December 2011 based on the unusually low analytical concentrations observed on December 22 and 28, 2011 of 6.6 and 4.9 ppm, respectively. Therefore, hydrocarbon removal rates during the first 15 days of February were calculated using the average of the two (2) analytical concentrations observed in December, 2011 along with the influent flow rates observed during the first 15 days of February. It is also noted that the same sparge wells (AS-1 thru AS-8) and extraction wells (V-2, V-4 and V-5) were online when the system was operational from December, 2011 to February 15, 2012.

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Subsequent to fixing the leak on February 15, 2012, V-1, V-3 and V-6 were brought online and AS-7 and AS-8 were shut offline in an attempt to optimize the system. Per observed PID readings, influent concentrations increased and so the system was left in the changed configuration. Hydrocarbon removal rates during the last 14 days of February were calculated using the analytical sample collected on February 17, 2012 as this data is representative of hydrocarbon concentrations because the same sparge wells (AS-1 thru AS-6) and extraction wells (V-1 thru V-6) were online during this period.

### **February 2012 Groundwater Monitoring Results**

Groundwater samples were collected on February 17, 2012 from the following wells:

- BP-MW-09 (upgradient of Cell 1),
- CO18-PZM006 (upgradient of Cell 1 at edge of berm), and
- CO02-PZM006 (downgradient of Cell 1).

The groundwater samples were submitted to Microbac Laboratories, Inc. of Baltimore, Maryland (Microbac) for the analyses shown in **Table 3**. These data indicate benzene is the most prevalent volatile organic compound (VOC) constituent.

**Figure 4** presents a graph of the total measured VOC concentration in Cell 1 groundwater for each well on a monthly basis since the startup of the IM system. Since system startup in August 2010, a decreasing total VOC concentration trend is documented at well CO18-PZM006 while a generally decreasing trend is observed at wells BP-MW-09 and C002-PZM006. The identified trend for these monitoring wells will continue to be monitored and assessed during system operation in future months.

## **Coke Oven Area Interim Remedial Measures Progress Report**

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### **Cell 3: AS/SVE System in the “Cove” Area**

Cell 3 consists of an AS/SVE system coupled with vapor destruction via an electric CATOX unit. **Figure 1** shows the location of the Cell 3 AS/SVE treatment area at the COA. The major design components are described in the Cell 3 final design report (*Coke Oven Area Interim Measures Cell 3 “Cove” Area Air Sparge/Soil Vapor Extraction System Design*), submitted to US EPA on March 1, 2011.

#### **February 2012 Operational Performance**

Operational performance of Cell 3 during this reporting period is summarized in **Table 4**. In summary, the CATOX unit operated for 693 hours (99.6 %) during February. Operations were in conformance with the manufacturer’s specifications at all times that soil gases were collected in accordance with the May 20, 2011 modified permit-to-construct conditions.

The hydrocarbon removal rate was calculated to be approximately 0.02 pounds per operating hour (estimated monthly total of 15.1 pounds). **Table 4** also includes a cumulative summary of operational performance since system startup on June 24, 2011. In total, Cell 3 has destroyed approximately 489.3 pounds of recovered hydrocarbons. **Figure 3** presents a graph of the cumulative estimated monthly hydrocarbon recovery in Cell 3 since the startup of the IM system.

Soil gas samples were collected for laboratory and/or field instrument (e.g., PID) analysis to monitor CATOX unit performance. One (1) untreated soil gas sample was collected in a Tedlar® bag and submitted to TestAmerica. The influent soil gas hydrocarbon concentration collected on February 17, 2012 was 14.8 ppmv as summarized in **Table 5**.

Hydrocarbon removal calculations were based entirely on the analytical results and the corresponding field-measured influent flow rate at the time of sampling. The mass removal calculations assume that the sample collected on February 17, 2012 is representative of hydrocarbon concentrations for the entire month of February. This assumption is based on the fact that the same sparge wells (AS-2 thru AS-12) and extraction wells (V-2 thru V-4) were online when the system was operational.

#### **February 2012 Cell 3 Groundwater Monitoring**

Groundwater samples were collected on February 17, 2012 from the following wells (**Figure 1**):

- MW-CELL3-1 (downgradient of Cell 3),
- MW-CELL3-2 (upgradient of Cell 3),
- MW-CELL3-3 (upgradient of Cell 3, and

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- CO30-PZM015 (downgradient of Cell 3).

The groundwater samples were submitted to Microbac for the analyses shown in **Table 6**. These data indicate that benzene is the most prevalent VOC constituent.

**Figure 5** presents a graph of the total measured VOC concentration in Cell 3 groundwater for each well on a monthly basis relative to the baseline concentrations collected in February 2011. The trends for these monitoring wells will continue to be monitored and assessed during system operation in future months.

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### **Cell 4: In-Situ Anaerobic Bio-treatment Area**

Cell 4 consists of an in-situ anaerobic bio-treatment system including extraction and mixing of groundwater in an above ground storage tank containing a nutrient amendment solution and reinjection of groundwater. A schematic layout of the Cell 4 system is shown on **Figure 6**. The major design components are described in the Cell 4 final design report (*Coke Oven Area Interim Measures Cell 4 In-Situ Anaerobic Bio-Treatment System Design*), submitted to US EPA on March 31, 2011.

#### **February 2012 Operations**

The fourth amendment dosing event occurred from February 14 to 16, 2012. Sixty (60) pounds of amendment (VB591<sup>®</sup>) was mixed into 300 gallons of Cell 4 groundwater. Extracted groundwater from wells OBS-8 and MW-CELL4-6 was mixed with amendment and circulated back in to the groundwater at wells MW-CELL4-1, OBS-10, EXT-2, MW-CELL4-2 and MW-CELL4-3. Overall, a total of approximately 9,300 gallons of groundwater (including the 300 gallons of amendment mixture) were re-circulated in the Cell 4 bio-treatment area.

#### **Dosing Event Observations**

A double-diaphragm dosing pump was used to transfer the groundwater-amendment mixture from the poly tank into the groundwater flow line so that the amendment mixture was evenly and continuously distributed into the groundwater flow from wells OBS-8 and MW-CELL4-6 to the five (5) recirculation wells. The pump rates from both OBS-8 and MW-CELL4-6 were maintained around 4 to 6 gallons per minute (gpm). No water was extracted from monitoring well MW-CELL4-7 due to its low recharge rate.

Prior to the third dosing event in November 2011, PVC adapter fittings were welded to the tops of each recirculation well to pressurize the wells and allow for a uniform distribution of approximately 1.5 to 2.5 gpm of amended groundwater to each well. The extracted groundwater flow rate was limited by the five (5) recirculation wells' capacity to receive the groundwater as back pressure across the system quickly increased with time. The two (2) hoses connecting the extraction manifold to the recirculation manifold were rated for maximum pressure of 34 pounds per square inch (psi). Thus, for precautionary purposes, the extracted groundwater flow rate was maintained at approximately 8 to 9 gpm to limit back pressure to 25 to 28 psi. These two hoses will be replaced by high-pressure water hose prior to the fifth dosing event currently scheduled for mid-April.

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### **February 2012 Groundwater Monitoring Results**

Groundwater samples were collected on February 13 and 17, 2012 (before and after nutrient amendment, respectively) for comparison purposes. Groundwater samples were collected from the following wells (**Figure 7**):

- OBS-6
- OBS-8
- EXT-2
- AS-2
- MW-CELL4-1
- MW-CELL4-3
- MW-CELL4-4
- MW-CELL4-5
- MW-CELL4-6
- MW-CELL4-7

The groundwater samples were submitted to Microbac for the analyses shown in **Table 7**. These data indicate naphthalene is the most prevalent VOC constituent.

**Figure 8** presents a graph of the total VOC concentrations in Cell 4 groundwater on a monthly basis, as well as before and after the dosing events. A generally decreasing trend is observed at all monitored Cell 4 wells since system dosing was initiated in July 2011. Trends for these monitoring wells will continue to be monitored and assessed during system operation in future months.

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### Cell 6: LNAPL Extraction at the Former Benzol Processing Area

The Cell 6 LNAPL monitoring and recovery system was monitored approximately once every two weeks during February (two [2] site visits). **Table 8** summarizes LNAPL occurrence and recovery observed during the reporting period along with the cumulative LNAPL recovery since the beginning of the project. **Figure 9** illustrates the well locations.

During February, approximately 87 gallons (637 pounds) of LNAPL were recovered, bringing the total recovered LNAPL to 6,870 gallons (50,338 pounds) as of February 24, 2012. The LNAPL was recovered from the following wells:

Well	LNAPL Recovery (gal / lbs)		Notes
	During February 2012	Total thru Feb. 24, 2012	
BP-MW-05	70.5 / 517	5,571 / 40,821	(c)
RW-04	14.1 / 103	967 / 7,088	(c)
BP-MW-08	2.3 / 17	318 / 2,327	(c)
BP-MW-11	0 / 0	7.8 / 57	(a)
RW-03	0 / 0	4.0 / 29	(b)
RW-01	0 / 0	1.3 / 10	(b)
RW-02	0 / 0	0.8 / 5.9	(b)

(a) Recovery system moved from BP-MW-11 to BP-MW-08 on September 8, 2010.

(b) Manual bailing.

(c) Cumulative totals included estimated recovery from 12/28/11 to 1/18/12.

The wells are presented in **Table 8** generally in the order of decreasing LNAPL occurrence/recovery. During the reporting period, the range of LNAPL thicknesses varied as summarized below (wells are not listed if LNAPL was not present):

- RW-04 (0.05 to 0.10 ft),
- BP-MW-05 (0.77 to 1.08 ft),
- BP-MW-08 (2.10 to 2.77 ft),
- BP-MW-10 (0.22 to 0.47 ft),
- RW-02 (0.09 to 0.13 ft),
- RW-03 (0.19 to 0.34 ft)
- RW-01 (0.17 to 0.17 ft), and

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- BP-MW-07 (0.09 to 0.12 ft)

No LNAPL was observed in wells BP-MW-11, RW-05, BP-MW-06, BP-MW-09, or CO19-PZM004.

For all wells in which LNAPL accumulated, **Table 9** provides well-specific details concerning the measured depths to LNAPL, the water table, and calculated LNAPL thicknesses.

# **Tables**

**Table 1**  
**Summary of Operating Conditions**  
**Cell 1: Prototype AS/SVE System in Former Benzol Processing Area**  
**Former Coke Oven Area Interim Remedial Measures**  
**RG Steel Sparrows Point, LLC**

**Cell 1 February 2012 Estimated Hydrocarbon Recovery**

Parameter	Units	Quantity
Total CATOX Operating Time (February 1 - February 29, 2012)	hours	693
Overall CATOX Operational Time	%	99.6
Estimated Total Hydrocarbons Destroyed	pounds	48.07
Estimated Hydrocarbon Removal Rate	pounds/hour	0.07

**Cell 1 Cumulative Summary of Estimated Hydrocarbon Recovery**

Parameter	Units	Quantity
Total ICE/CATOX Operating Time (August 3, 2010 - February 29, 2012)	hours	10,091
Overall ICE/CATOX Operational Time	%	73.1
Estimated Total Hydrocarbons Destroyed	pounds	9,157
Estimated Average Hydrocarbon Removal Rate	pounds/hour	0.91

**Table 2**  
**Summary of Soil Gas Analytical Results (February 2012)**  
**Cell 1: Prototype AS/SVE System in Former Benzol Processing Area**  
**Former Coke Oven Area Interim Remedial Measures**  
**RG Steel Sparrows Point, LLC**

Sample ID	CATOX Influent	
Date	2/17/2012	
Time	11:05	
Dilution Factor	2586.38	
Analyte	Units	
<b>TO-15 Volatile Organics</b>		
trans-1,3-Dichloropropene	ppb	< 520 U
Acetone	ppb	< 13,000 U
Ethylbenzene	ppb	< 520 U
2-Hexanone	ppb	< 1,300 U
Methylene Chloride	ppb	< 1,300 U
<b>Benzene</b>	ppb	<b>53,000</b>
1,1,2,2-Tetrachloroethane	ppb	< 520 U
Tetrachloroethene	ppb	< 520 U
<b>Toluene</b>	ppb	<b>18,000</b>
1,1,1-Trichloroethane	ppb	< 520 U
1,1,2-Trichloroethane	ppb	< 520 U
Trichloroethene	ppb	< 520 U
Vinyl Chloride	ppb	< 520 U
<b>o-Xylene</b>	ppb	<b>3,000</b>
<b>m-Xylene &amp; p-Xylene</b>	ppb	<b>5,900</b>
2-Butanone (MEK)	ppb	< 2,600 U
4-Methyl-2-pentanone (MIBK)	ppb	< 1,300 U
Bromoform	ppb	< 520 U
Carbon Disulfide	ppb	< 1,300 U
Carbon tetrachloride	ppb	< 520 U
Chlorobenzene	ppb	< 520 U
Chloroethane	ppb	< 520 U
Chloroform	ppb	< 520 U
1,1-Dichloroethane	ppb	< 520 U
1,2-Dichloroethane	ppb	< 520 U
1,1-Dichloroethene	ppb	< 520 U
trans-1,2-Dichloroethene	ppb	< 520 U
1,2-Dichloropropane	ppb	< 520 U
cis-1,3-Dichloropropene	ppb	< 520 U
<b>Total Volatile Organics</b>	ppb	<b>79,900</b>

**Notes:**

**BOLD** = Analyte detected

ppb = parts per billion

</U = Analyte not detected above corresponding laboratory reporting limit

**Table 3**  
**Summary of Groundwater Analytical Results (February 2012)**  
**Cell 1: Prototype AS/SVE System in Former Benzol Processing Area**  
**Former Coke Oven Area Interim Remedial Measures**  
**RG Steel Sparrows Point, LLC**

Analyte	Sample ID	CO02-PZM006	CO18-PZM006	BP-MW-09
	Date	2/17/2012	2/17/2012	2/17/2012
	Time	14:02	13:23	14:37
	Units			
<b>Water Quality Parameters</b>				
Temperature	deg C	20.80	24.11	15.16
pH	std units	7.42	6.64	11.64
ORP	mV	-281	-160	-370
Conductivity	mS/cm	1.66	2.31	2.17
Turbidity	NTU	--	--	--
Dissolved Oxygen	mg/L	0.00	0.50	0.00
<b>Volatile Organics</b>				
Vinyl Chloride	µg/L	< 5,000 U	< 5,000 U	< 5,000 U
Chloroethane	µg/L	< 5,000 U	< 5,000 U	< 5,000 U
1,1-Dichloroethene	µg/L	< 5,000 U	< 5,000 U	< 5,000 U
Acetone	µg/L	< 120,000 U	< 120,000 U	< 120,000 U
Carbon Disulfide	µg/L	< 5,000 U	< 5,000 U	< 5,000 U
Methylene Chloride	µg/L	< 25,000 U	< 25,000 U	< 25,000 U
trans-1,2-Dichloroethene	µg/L	< 5,000 U	< 5,000 U	< 5,000 U
1,1-Dichloroethane	µg/L	< 5,000 U	< 5,000 U	< 5,000 U
2-Butanone (MEK)	µg/L	< 25,000 U	< 25,000 U	< 25,000 U
Chloroform	µg/L	< 5,000 U	< 5,000 U	< 5,000 U
1,1,1-Trichloroethane	µg/L	< 5,000 U	< 5,000 U	< 5,000 U
Carbon Tetrachloride	µg/L	< 5,000 U	< 5,000 U	< 5,000 U
<b>Benzene</b>	µg/L	<b>400,000</b>	<b>230,000</b>	<b>230,000</b>
1,2-Dichloroethane	µg/L	< 5,000 U	< 5,000 U	< 5,000 U
Trichloroethene	µg/L	< 5,000 U	< 5,000 U	< 5,000 U
1,2-Dichloropropane	µg/L	< 5,000 U	< 5,000 U	< 5,000 U
Methyl Isobutyl Ketone (MIBK)	µg/L	< 25,000 U	< 25,000 U	< 25,000 U
cis-1,3-Dichloropropene	µg/L	< 5,000 U	< 5,000 U	< 5,000 U
<b>Toluene</b>	µg/L	<b>30,000</b>	<b>24,000</b>	<b>52,000</b>
trans-1,3-Dichloropropene	µg/L	< 5,000 U	< 5,000 U	< 5,000 U
1,1,2-Trichloroethane	µg/L	< 5,000 U	< 5,000 U	< 5,000 U
2-Hexanone (MBK)	µg/L	< 25,000 U	< 25,000 U	< 25,000 U
Tetrachloroethene	µg/L	< 5,000 U	< 5,000 U	< 5,000 U
Chlorobenzene	µg/L	< 5,000 U	< 5,000 U	< 5,000 U
1,1,1,2-Tetrachloroethane	µg/L	< 5,000 U	< 5,000 U	< 5,000 U
Ethylbenzene	µg/L	< 5,000 U	< 5,000 U	< 5,000 U
Bromoform	µg/L	< 5,000 U	< 5,000 U	< 5,000 U
1,1,2,2-Tetrachloroethane	µg/L	< 5,000 U	< 5,000 U	< 5,000 U
<b>Total Xylenes</b>	µg/L	< 15,000 U	< 15,000 U	<b>30,000</b>
<b>Total Volatile Organics</b>	µg/L	<b>430,000</b>	<b>254,000</b>	<b>312,000</b>

**Notes:**

-- = Not Measured

**Bold** = Analyte Detected

deg C = degrees Celcius

mg/L = Milligram per liter

mS/cm = Microsiemens per Centimeter

mV = Millivolts

NTU = Nephelometric Turbidity Units

ORP = Oxidation Reduction Potential

std units = standard units

</U = Analyte not detected above corresponding laboratory reporting limit

µg/L = Micrograms per liter

**Table 4**  
**Summary of Operating Conditions**  
**Cell 3: AS/SVE System in the "Cove" Area**  
**Former Coke Oven Area Interim Remedial Measures**  
**RG Steel Sparrows Point, LLC**

**Cell 3 February 2012 Estimated Hydrocarbon Recovery**

Parameter	Units	Quantity
Total CATOX Operating Time (February 1 - February 29, 2012)	hours	693
Overall CATOX Operational Time	%	99.6
Estimated Total Hydrocarbons Destroyed	pounds	15.1
Estimated Hydrocarbon Removal Rate	pounds/hour	0.02

**Cell 3 Cumulative Summary of Estimated Hydrocarbon Recovery**

Parameter	Units	Quantity
Total CATOX Operating Time (June 24, 2011 - February 29, 2012)	hours	4,645
Overall CATOX Operational Time	%	70.6
Estimated Total Hydrocarbons Destroyed	pounds	489.3
Estimated Hydrocarbon Removal Rate	pounds/hour	0.11

**Table 5**  
**Summary of Soil Gas Analytical Results (February 2012)**  
**Cell 3: AS/SVE System in the "Cove" Area**  
**Former Coke Oven Area Interim Remedial Measures**  
**RG Steel Sparrows Point, LLC**

Sample ID	CATOX Influent	
Date	2/17/2012	
Time	10:40	
Dilution Factor	1669.43	
Analyte	Units	
<b>TO-15 Volatile Organics</b>		
trans-1,3-Dichloropropene	ppb	< 330 U
Acetone	ppb	< 8,300 U
Ethylbenzene	ppb	< 330 U
2-Hexanone	ppb	< 830 U
Methylene Chloride	ppb	< 830 U
<b>Benzene</b>	ppb	<b>14,000</b>
1,1,2,2-Tetrachloroethane	ppb	< 330 U
Tetrachloroethene	ppb	< 330 U
<b>Toluene</b>	ppb	<b>770</b>
1,1,1-Trichloroethane	ppb	< 330 U
1,1,2-Trichloroethane	ppb	< 330 U
Trichloroethene	ppb	< 330 U
Vinyl Chloride	ppb	< 330 U
o-Xylene	ppb	< 330 U
m-Xylene & p-Xylene	ppb	< 330 U
2-Butanone (MEK)	ppb	< 1,700 U
4-Methyl-2-pentanone (MIBK)	ppb	< 830 U
Bromoform	ppb	< 330 U
Carbon Disulfide	ppb	< 830 U
Carbon tetrachloride	ppb	< 330 U
Chlorobenzene	ppb	< 330 U
Chloroethane	ppb	< 330 U
Chloroform	ppb	< 330 U
1,1-Dichloroethane	ppb	< 330 U
1,2-Dichloroethane	ppb	< 330 U
1,1-Dichloroethene	ppb	< 330 U
trans-1,2-Dichloroethene	ppb	< 330 U
1,2-Dichloropropane	ppb	< 330 U
cis-1,3-Dichloropropene	ppb	< 330 U
<b>Total Volatile Organics</b>	ppb	<b>14,770</b>

**Notes:**

**BOLD** = Analyte detected

ppb = parts per billion

</U = Analyte not detected above corresponding laboratory reporting limit

**Table 6**  
**Summary of Groundwater Analytical Results (February 2012)**  
**Cell 3: AS/SVE System in the "Cove" Area**  
**Former Coke Oven Area Interim Remedial Measures**  
**RG Steel Sparrows Point, LLC**

Analyte	Sample ID	CO30-PZM015	MW-CELL 3-1	MW-CELL 3-2	MW-CELL 3-3
	Date	2/17/2012	2/17/2012	2/17/2012	2/17/2012
	Time	10:33	11:15	11:55	12:35
	Units				
<b>Water Quality Parameters</b>					
Temperature	deg C	16.59	17.02	17.40	16.72
pH	std units	11.90	11.79	11.64	12.13
ORP	mV	-363	-360	-349	-349
Conductivity	mS/cm	2.84	2.49	2.17	3.72
Turbidity	NTU	--	--	--	--
Dissolved Oxygen	mg/L	0.00	0.00	0.21	0.32
<b>Volatile Organics</b>					
Vinyl Chloride	µg/L	< 100 U	< 500 U	< 100 U	< 500 U
Chloroethane	µg/L	< 100 U	< 500 U	< 100 U	< 500 U
1,1-Dichloroethene	µg/L	< 100 U	< 500 U	< 100 U	< 500 U
Acetone	µg/L	< 2,500 U	< 12,000 U	< 2,500 U	< 12,000 U
Carbon Disulfide	µg/L	< 100 U	< 500 U	< 100 U	< 500 U
Methylene Chloride	µg/L	< 500 U	< 2,500 U	< 500 U	< 2,500 U
trans-1,2-Dichloroethene	µg/L	< 100 U	< 500 U	< 100 U	< 500 U
1,1-Dichloroethane	µg/L	< 100 U	< 500 U	< 100 U	< 500 U
2-Butanone (MEK)	µg/L	< 500 U	< 2500 U	< 500 U	< 2,500 U
Chloroform	µg/L	< 100 U	< 500 U	< 100 U	< 500 U
1,1,1-Trichloroethane	µg/L	< 100 U	< 500 U	< 100 U	< 500 U
Carbon Tetrachloride	µg/L	< 100 U	< 500 U	< 100 U	< 500 U
<b>Benzene</b>	µg/L	<b>45,000</b>	<b>5,900</b>	<b>8,400</b>	<b>27,000</b>
1,2-Dichloroethane	µg/L	< 100 U	< 500 U	< 100 U	< 500 U
Trichloroethene	µg/L	< 100 U	< 500 U	< 100 U	< 500 U
1,2-Dichloropropane	µg/L	< 100 U	< 500 U	< 100 U	< 500 U
Methyl Isobutyl Ketone (MIBK)	µg/L	< 500 U	< 2,500 U	< 500 U	< 2,500 U
cis-1,3-Dichloropropene	µg/L	< 100 U	< 500 U	< 100 U	< 500 U
<b>Toluene</b>	µg/L	<b>2,500</b>	< 500 U	<b>650</b>	<b>2,200</b>
trans-1,3-Dichloropropene	µg/L	< 100 U	< 500 U	< 100 U	< 500 U
1,1,2-Trichloroethane	µg/L	< 100 U	< 500 U	< 100 U	< 500 U
2-Hexanone (MBK)	µg/L	< 500 U	< 2,500 U	< 500 U	< 2,500 U
Tetrachloroethene	µg/L	< 100 U	< 500 U	< 100 U	< 500 U
Chlorobenzene	µg/L	< 100 U	< 500 U	< 100 U	< 500 U
1,1,1,2-Tetrachloroethane	µg/L	< 100 U	< 500 U	< 100 U	< 500 U
Ethylbenzene	µg/L	< 100 U	< 500 U	< 100 U	< 500 U
Bromoform	µg/L	< 100 U	< 500 U	< 100 U	< 500 U
1,1,2,2-Tetrachloroethane	µg/L	< 100 U	< 500 U	< 100 U	< 500 U
Xylenes, Total	µg/L	<b>880</b>	< 1,500 U	< 300 U	< 1,500 U
<b>Total Volatile Organics</b>	µg/L	<b>48,380</b>	<b>5,900</b>	<b>9,050</b>	<b>29,200</b>

**Notes:**

-- = Not Measured

**Bold** = Analyte Detected

deg C = degrees Celcius

µg/L = Milligram per liter

mS/cm = Microsiemens per Centimeter

mV = Millivolts

NTU = Nephelometric Turbidity Units

ORP = Oxidation Reduction Potential

std units = standard units

</U = Analyte not detected above corresponding laboratory reporting limit

µg/L = Micrograms per liter

**Table 7**  
**Summary of Groundwater Analytical Results (February 2012)**  
**Cell 4: In-Situ Anaerobic Bio-Treatment Area**  
**Former Coke Oven Area Interim Remedial Measures**  
**RG Steel Sparrows Point, LLC**

Sample ID	OBS-6 02/13/12 15:02	OBS-6 02/14/12 12:15	OBS-6 02/14/12 15:51	OBS-6 02/15/12 8:22	OBS-6 02/15/12 13:01	OBS-6 02/15/12 16:42	OBS-6 02/16/12 8:53	OBS-6 02/16/12 13:14	OBS-6 02/17/12 10:33	OBS-7 02/14/12 11:56	OBS-7 02/14/12 15:38	OBS-7 02/14/12 8:17	OBS-7 02/15/12 12:54	OBS-7 02/15/12 16:30	OBS-7 02/16/12 8:49	OBS-7 02/16/12 13:12	OBS-8 02/13/12 12:20	OBS-8 02/17/12 11:40	
<b>Water Quality Parameters</b>																			
Temperature	deg C	15.19	17.64	16.15	15.49	17.36	16.95	15.89	17.25	15.53	18.46	16.64	16.24	18.14	17.69	16.09	17.57	18.25	19.06
pH	std units	14.00	11.91	11.92	11.72	11.93	11.99	11.51	11.94	12.32	11.43	11.47	11.30	11.40	11.46	11.28	11.33	11.54	11.56
ORP	mV	-269	-183	-166	-153	-152	-130	-132	-153	-297	-180	-194	-162	-174	-190	-162	-165	-219	-303
Conductivity	mS/cm	2.76	2.29	2.28	2.30	2.31	2.31	2.34	2.28	2.84	1.63	1.60	1.92	2.19	2.18	2.02	2.03	1.92	1.77
Turbidity	NTU	1.20	1.57	7.74	4.62	3.43	2.71	2.30	2.02	5.23	8.33	1.90	1.24	0.79	1.04	0.92	0.76	1.93	4.32
Dissolved Oxygen	mg/L	0.00	0.61	8.18	1.46	2.43	1.01	1.50	1.62	0.00	1.19	1.16	8.74	1.15	1.60	1.90	5.53	0.00	0.00
<b>Volatile Organics</b>																			
Vinyl Chloride	µg/L	< 100 U	--	--	--	--	--	--	--	< 100 U	--	--	--	--	--	--	< 100 U	< 100 U	
Chloroethane	µg/L	< 100 U	--	--	--	--	--	--	--	< 100 U	--	--	--	--	--	--	< 100 U	< 100 U	
1,1-Dichloroethene	µg/L	< 100 U	--	--	--	--	--	--	--	< 100 U	--	--	--	--	--	--	< 100 U	< 100 U	
Acetone	µg/L	< 2,500 U	--	--	--	--	--	--	--	< 2,500 U	--	--	--	--	--	--	< 2,500 U	< 2,500 U	
Carbon Disulfide	µg/L	< 100 U	--	--	--	--	--	--	--	< 100 U	--	--	--	--	--	--	< 100 U	< 100 U	
Methylene Chloride	µg/L	< 500 U	--	--	--	--	--	--	--	< 500 U	--	--	--	--	--	--	< 500 U	< 500 U	
trans-1,2-Dichloroethene	µg/L	< 100 U	--	--	--	--	--	--	--	< 100 U	--	--	--	--	--	--	< 100 U	< 100 U	
1,1-Dichloroethane	µg/L	< 100 U	--	--	--	--	--	--	--	< 100 U	--	--	--	--	--	--	< 100 U	< 100 U	
2-Butanone (MEK)	µg/L	< 500 U	--	--	--	--	--	--	--	< 500 U	--	--	--	--	--	--	< 500 U	< 500 U	
Chloroform	µg/L	< 100 U	--	--	--	--	--	--	--	< 100 U	--	--	--	--	--	--	< 100 U	< 100 U	
1,1,1-Trichloroethane	µg/L	< 100 U	--	--	--	--	--	--	--	< 100 U	--	--	--	--	--	--	< 100 U	< 100 U	
Carbon Tetrachloride	µg/L	< 100 U	--	--	--	--	--	--	--	< 100 U	--	--	--	--	--	--	< 100 U	< 100 U	
Benzene	µg/L	<b>500</b>	--	--	--	--	--	--	--	<b>2,600</b>	--	--	--	--	--	--	<b>640</b>	<b>970</b>	
1,2-Dichloroethane	µg/L	< 100 U	--	--	--	--	--	--	--	< 100 U	--	--	--	--	--	--	< 100 U	< 100 U	
Trichloroethene	µg/L	< 100 U	--	--	--	--	--	--	--	< 100 U	--	--	--	--	--	--	< 100 U	< 100 U	
1,2-Dichloropropene	µg/L	< 100 U	--	--	--	--	--	--	--	< 100 U	--	--	--	--	--	--	< 100 U	< 100 U	
Methyl Isobutyl Ketone (MIBK)	µg/L	< 500 U	--	--	--	--	--	--	--	< 500 U	--	--	--	--	--	--	< 500 U	< 500 U	
cis-1,3-Dichloropropene	µg/L	< 100 U	--	--	--	--	--	--	--	< 100 U	--	--	--	--	--	--	< 100 U	< 100 U	
Toluene	µg/L	<b>340</b>	--	--	--	--	--	--	--	<b>1,900</b>	--	--	--	--	--	--	<b>380</b>	<b>580</b>	
trans-1,3-Dichloropropene	µg/L	< 100 U	--	--	--	--	--	--	--	< 100 U	--	--	--	--	--	--	< 100 U	< 100 U	
1,1,2-Trichloroethane	µg/L	< 100 U	--	--	--	--	--	--	--	< 100 U	--	--	--	--	--	--	< 100 U	< 100 U	
2-Hexanone (MBK)	µg/L	< 500 U	--	--	--	--	--	--	--	< 500 U	--	--	--	--	--	--	< 500 U	< 500 U	
Tetrachloroethene	µg/L	< 100 U	--	--	--	--	--	--	--	< 100 U	--	--	--	--	--	--	< 100 U	< 100 U	
Chlorobenzene	µg/L	< 100 U	--	--	--	--	--	--	--	< 100 U	--	--	--	--	--	--	< 100 U	< 100 U	
1,1,1,2-Tetrachloroethane	µg/L	< 100 U	--	--	--	--	--	--	--	< 100 U	--	--	--	--	--	--	< 100 U	< 100 U	
Ethylbenzene	µg/L	< 100 U	--	--	--	--	--	--	--	< 100 U	--	--	--	--	--	--	< 100 U	< 100 U	
Bromoform	µg/L	< 100 U	--	--	--	--	--	--	--	< 100 U	--	--	--	--	--	--	< 100 U	< 100 U	
1,1,2,2-Tetrachloroethane	µg/L	< 100 U	--	--	--	--	--	--	--	< 100 U	--	--	--	--	--	--	< 100 U	< 100 U	
Xylenes, Total	µg/L	<b>520</b>	--	--	--	--	--	--	--	<b>1,400</b>	--	--	--	--	--	--	<b>630</b>	<b>750</b>	
<b>Semi-Volatiles</b>																			
Naphthalene	µg/L	<b>5,400</b>	--	--	--	--	--	--	--	<b>13,000</b>	--	--	--	--	--	--	<b>3,900</b>	<b>6,000</b>	
Total Volatile Organics	µg/L	<b>6,760</b>	--	--	--	--	--	--	--	<b>18,900</b>	--	--	--	--	--	--	<b>5,550</b>	<b>8,300</b>	
<b>Wet Chemistry</b>																			
Ferric Iron	mg/L	<b>0.14</b>	--	--	--	--	--	--	--	<b>0.16</b>	--	--	--	--	--	--	<b>0.22</b>	<b>0.18</b>	
Ferrous Iron	mg/L	< 0.10 U	--	--	--	--	--	--	--	<b>0.22</b>	--	--	--	--	--	--	< 0.10 U	<b>0.12</b>	
Nitrite-N	mg/L	<b>0.15</b>	--	--	--	--	--	--	--	<b>0.21</b>	--	--	--	--	--	--	<b>0.068</b>	<b>0.070&lt;/</b>	

**Table 7**  
**Summary of Groundwater Analytical Results (February 2012)**  
**Cell 4: In-Situ Anaerobic Bio-Treatment Area**  
**Former Coke Oven Area Interim Remedial Measures**  
**RG Steel Sparrows Point, LLC**

Sample ID	OBS-9	EXT-2	EXT-2	AS-2	AS-2	AS-2	AS-2	AS-2	AS-2	AS-2	AS-2	Cell 4-1	Cell 4-1	Cell 4-3	Cell 4-3	Cell 4-4	Cell 4-4		
Date	02/14/12	02/13/12	02/17/12	02/13/12	02/14/12	02/15/12	02/15/12	02/15/12	02/16/12	02/16/12	02/17/12	02/13/12	02/17/12	02/13/12	02/17/12	02/13/12	02/14/12		
Time	11:35	12:20	9:35	15:50	11:46	15:33	8:12	12:49	8:45	13:08	12:25	13:45	11:20	10:50	8:35	10:10	10:55		
Units																			
<b>Water Quality Parameters</b>																			
Temperature	deg C	17.50	14.93	15.76	18.51	18.42	16.21	16.07	18.58	17.72	16.26	18.13	15.90	15.88	13.91	14.39	18.34	17.17	
pH	std units	--	13.72	11.36	11.18	11.13	11.22	11.03	11.14	11.21	11.10	11.21	11.82	14.00	11.50	14.00	11.61	11.03	--
ORP	mV	-191	-281	-249	-220	-148	-160	-137	-141	-143	-126	-157	-271	-317	-255	-322	-260	-279	-178
Conductivity	mS/cm	1.62	1.65	1.74	3.29	3.24	3.23	3.20	3.14	3.24	3.40	3.27	3.71	1.70	2.15	1.74	1.70	3.26	
Turbidity	NTU	--	6.98	41.9	1.87	70.3	49.7	24.4	9.83	9.57	3.03	3.06	3.70	7.04	33.6	11.7	20.8	0.80	30.3
Dissolved Oxygen	mg/L	8.80	0.00	0.00	0.00	8.65	1.68	4.21	1.41	9.33	2.26	9.26	0.25	0.00	0.45	0.43	0.00	0.00	8.20
<b>Volatile Organics</b>																			
Vinyl Chloride	µg/L	--	< 100 U	< 100 U	< 1,000 U	--	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 100 U	< 100 U	< 100 U	--	
Chloroethane	µg/L	--	< 100 U	< 100 U	< 1,000 U	--	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 100 U	< 100 U	< 100 U	--	
1,1-Dichloroethene	µg/L	--	< 100 U	< 100 U	< 1,000 U	--	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 100 U	< 100 U	< 100 U	--	
Acetone	µg/L	--	< 2,500 U	< 2,500 U	< 25,000 U	--	--	--	--	--	--	< 12,000 U	< 2,500 U	--					
Carbon Disulfide	µg/L	--	< 100 U	< 100 U	< 1,000 U	--	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 100 U	< 100 U	< 100 U	--	
Methylene Chloride	µg/L	--	< 500 U	< 500 U	< 5,000 U	--	--	--	--	--	--	< 2,500 U	< 500 U	< 500 U	< 500 U	< 500 U	< 500 U	--	
trans-1,2-Dichloroethene	µg/L	--	< 100 U	< 100 U	< 1,000 U	--	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 100 U	< 100 U	< 100 U	--	
1,1-Dichloroethane	µg/L	--	< 100 U	< 100 U	< 1,000 U	--	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 100 U	< 100 U	< 100 U	--	
2-Butanone (MEK)	µg/L	--	< 500 U	< 500 U	< 5,000 U	--	--	--	--	--	--	< 2,500 U	< 500 U	< 500 U	< 500 U	< 500 U	< 500 U	--	
Chloroform	µg/L	--	< 100 U	< 100 U	< 1,000 U	--	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 100 U	< 100 U	< 100 U	--	
1,1,1-Trichloroethane	µg/L	--	< 100 U	< 100 U	< 1,000 U	--	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 100 U	< 100 U	< 100 U	--	
Carbon Tetrachloride	µg/L	--	< 100 U	< 100 U	< 1,000 U	--	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 100 U	< 100 U	< 100 U	--	
Benzene	µg/L	--	720	920	5,400	--	--	--	--	--	--	5,000	930	1,200	550	960	1,000	--	
1,2-Dichloroethane	µg/L	--	< 100 U	< 100 U	< 1,000 U	--	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 100 U	< 100 U	< 100 U	--	
Trichloroethene	µg/L	--	< 100 U	< 100 U	< 1,000 U	--	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 100 U	< 100 U	< 100 U	--	
1,2-Dichloropropane	µg/L	--	< 100 U	< 100 U	< 1,000 U	--	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 100 U	< 100 U	< 100 U	--	
Methyl Isobutyl Ketone (MIBK)	µg/L	--	< 500 U	< 500 U	< 5,000 U	--	--	--	--	--	--	< 2,500 U	< 500 U	< 500 U	< 500 U	< 500 U	< 500 U	--	
cis-1,3-Dichloropropene	µg/L	--	< 100 U	< 100 U	< 1,000 U	--	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 100 U	< 100 U	< 100 U	--	
Toluene	µg/L	--	430	540	4,200	--	--	--	--	--	--	3,800	600	890	360	570	630	--	
trans-1,3-Dichloropropene	µg/L	--	< 100 U	< 100 U	< 1,000 U	--	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 100 U	< 100 U	< 100 U	--	
1,1,2-Trichloroethane	µg/L	--	< 100 U	< 100 U	< 1,000 U	--	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 100 U	< 100 U	< 100 U	--	
2-Hexanone (MBK)	µg/L	--	< 500 U	< 500 U	< 5,000 U	--	--	--	--	--	--	< 2,500 U	< 500 U	< 500 U	< 500 U	< 500 U	< 500 U	--	
Tetrachloroethene	µg/L	--	< 100 U	< 100 U	< 1,000 U	--	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 100 U	< 100 U	< 100 U	--	
Chlorobenzene	µg/L	--	< 100 U	< 100 U	< 1,000 U	--	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 100 U	< 100 U	< 100 U	--	
1,1,1,2-Tetrachloroethane	µg/L	--	< 100 U	< 100 U	< 1,000 U	--	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 100 U	< 100 U	< 100 U	--	
Ethylbenzene	µg/L	--	< 100 U	< 100 U	< 1,000 U	--	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 100 U	< 100 U	< 100 U	--	
Bromoform	µg/L	--	< 100 U	< 100 U	< 1,000 U	--	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 100 U	< 100 U	< 100 U	--	
1,1,2,2-Tetrachloroethane	µg/L	--	< 100 U	< 100 U	< 1,000 U	--	--</												

**Table 7**  
**Summary of Groundwater Analytical Results (February 2012)**  
**Cell 4: In-Situ Anaerobic Bio-Treatment Area**  
**Former Coke Oven Area Interim Remedial Measures**  
**RG Steel Sparrows Point, LLC**

Sample ID	Cell 4-4	Cell 4-4	Cell 4-4	Cell 4-4	Cell 4-4	Cell 4-4	Cell 4-4	Cell 4-5	Cell 4-5	Cell 4-5	Cell 4-5	Cell 4-5	Cell 4-5	Cell 4-5	Cell 4-6	Cell 4-6	Cell 4-7		
	Date	02/14/12	Date	02/15/12	Date	02/15/12	Date	02/16/12	Date	02/16/12	Date	02/16/12	Date	02/16/12	Date	02/17/12			
Time	15:28	Time	08:07	Time	12:45	Time	16:22	Time	08:41	Time	13:04	Time	09:55	Time	14:50	Time	12:57		
Units																			
<b>Water Quality Parameters</b>																			
Temperature	deg C	16.85	16.26	19.17	18.47	16.17	18.51	18.64	18.30	18.18	15.34	17.76	17.46	16.13	17.01	18.59	18.29	18.64	18.25
pH	std units	11.14	10.92	11.38	11.33	10.81	11.32	11.46	11.02	10.99	11.15	11.17	11.35	11.18	11.32	11.25	11.95	11.72	11.46
ORP	mV	-207	-189	-180	-187	-189	-198	-296	-236	-153	-146	-162	-183	-162	-142	-296	-215	-242	-207
Conductivity	mS/cm	1.58	1.49	1.48	1.47	1.48	1.48	1.64	2.65	2.60	2.48	2.42	2.27	2.42	2.34	2.62	2.67	1.91	2.32
Turbidity	NTU	64.9	13.0	8.09	7.13	2.84	4.13	0.80	0.42	5.82	1.10	1.40	1.29	1.10	0.42	3.56	0.39	1.18	0.72
Dissolved Oxygen	mg/L	8.44	2.46	1.81	1.39	1.63	7.50	0.00	0.00	8.73	8.46	8.79	9.06	1.21	1.34	0.00	0.00	0.00	0.00
<b>Volatile Organics</b>																			
Vinyl Chloride	µg/L	--	--	--	--	--	--	< 100 U	< 100 U	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 500 U	
Chloroethane	µg/L	--	--	--	--	--	--	< 100 U	< 100 U	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 500 U	
1,1-Dichloroethene	µg/L	--	--	--	--	--	--	< 100 U	< 100 U	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 500 U	
Acetone	µg/L	--	--	--	--	--	--	< 2,500 U	< 2,500 U	--	--	--	--	--	< 12,000 U	< 2,500 U	< 2,500 U	< 12,000 U	
Carbon Disulfide	µg/L	--	--	--	--	--	--	< 100 U	< 100 U	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 500 U	
Methylene Chloride	µg/L	--	--	--	--	--	--	< 500 U	< 500 U	--	--	--	--	--	< 2,500 U	< 500 U	< 500 U	< 2,500 U	
trans-1,2-Dichloroethene	µg/L	--	--	--	--	--	--	< 100 U	< 100 U	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 500 U	
1,1-Dichloroethane	µg/L	--	--	--	--	--	--	< 100 U	< 100 U	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 500 U	
2-Butanone (MEK)	µg/L	--	--	--	--	--	--	< 500 U	< 500 U	--	--	--	--	--	< 2,500 U	< 500 U	< 500 U	< 2,500 U	
Chloroform	µg/L	--	--	--	--	--	--	< 100 U	< 100 U	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 500 U	
1,1,1-Trichloroethane	µg/L	--	--	--	--	--	--	< 100 U	< 100 U	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 500 U	
Carbon Tetrachloride	µg/L	--	--	--	--	--	--	< 100 U	< 100 U	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 500 U	
Benzene	µg/L	--	--	--	--	--	--	1,100	3,500	--	--	--	--	--	2,000	700	820	950	
1,2-Dichloroethane	µg/L	--	--	--	--	--	--	< 100 U	< 100 U	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 500 U	
Trichloroethene	µg/L	--	--	--	--	--	--	< 100 U	< 100 U	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 500 U	
1,2-Dichloropropane	µg/L	--	--	--	--	--	--	< 100 U	< 100 U	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 500 U	
Methyl Isobutyl Ketone (MIBK)	µg/L	--	--	--	--	--	--	< 500 U	< 500 U	--	--	--	--	--	< 2,500 U	< 500 U	< 500 U	< 2,500 U	
cis-1,3-Dichloropropene	µg/L	--	--	--	--	--	--	< 100 U	< 100 U	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 500 U	
Toluene	µg/L	--	--	--	--	--	--	700	3,100	--	--	--	--	--	1,700	460	470	580	
trans-1,3-Dichloropropene	µg/L	--	--	--	--	--	--	< 100 U	< 100 U	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 500 U	
1,1,2-Trichloroethane	µg/L	--	--	--	--	--	--	< 100 U	< 100 U	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 500 U	
2-Hexanone (MBK)	µg/L	--	--	--	--	--	--	< 500 U	< 500 U	--	--	--	--	--	< 2,500 U	< 500 U	< 500 U	< 2,500 U	
Tetrachloroethene	µg/L	--	--	--	--	--	--	< 100 U	< 100 U	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 500 U	
Chlorobenzene	µg/L	--	--	--	--	--	--	< 100 U	< 100 U	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 500 U	
1,1,1,2-Tetrachloroethane	µg/L	--	--	--	--	--	--	< 100 U	< 100 U	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 500 U	
Ethylbenzene	µg/L	--	--	--	--	--	--	< 100 U	< 100 U	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 500 U	
Bromoform	µg/L	--	--	--	--	--	--	< 100 U	< 100 U	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 500 U	
1,1,2,2-Tetrachloroethane	µg/L	--	--	--	--	--	--	< 100 U	< 100 U	--	--	--	--	--	< 500 U	< 100 U	< 100 U	< 500 U	
Xylenes, Total	µg/L	--	--	--	--	--	--	950	2,300	--	--	--	--	--	< 1,500 U	670	670	< 1,500 U	
<b>Semi-Volatiles</b>																			
Naphthalene	µg/L	--	--	--	--	--	--	7,400	19,000	--	--	--	--	--	13,000	7,600	3,900	15,000	
Total Volatile Organics	µg/L	--	--	--	--	--	--	10,150	27,900	--	--	--	--	--	16,700	9,430	5,860	16,530	
<b>Wet Chemistry</b>																			
Ferric Iron	mg/L	--	--	--	--	--	--	0.17	0.19	--	--	--	--	--	0.57	0.16	0.14	0.45	
Ferrous Iron	mg/L	--	--	--	--	--	--	0.16	0.38	--	--	--	--	--	< 0.10 U	< 0.10 U	0.16	< 0.10 U	
Nitrite-N	mg/L	--	--	--	--	--	--	0.065	0.27	--	--	--	--	--	0.26	0.041	0.038	0.11	
Nitrate-N	mg/L	--	--	--	--	--	--	< 0.050 U	< 0.050 U	--	--	--	--	--	< 0.050 U	< 0.050 U	< 0.050 U	< 0.050 U	
Nitrate/Nitrite-N	mg/L	--	--	--	--	--	--	< 0.050 U	0.066	--	--	--	--	--	< 0.050 U	< 0.050 U	< 0.050 U	< 0.050 U	
Orthophosphate as P	mg/L	--	--	--	--	--	--	0.039	0.037	--	--	--	--	--	0.051	0.019	0.023	0.024	
Sulfate as SO4	mg/L	--	--	--	--	--	--	520	1,400	--	--	--	--	--	1,300	300	540	820	
Total Kjeldahl Nitrogen	mg/L	--	--	--	--	--	--	49	68	--	--	--	--	--	76	24	62	43	
<b>Metals</b>																			
Iron, Total	mg/L	--	--	--	--	--	--	0.33	0.57	--	--	--	--	--	0.57	0.16	0.30	0.45	

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**Notes:**

-- = Not Measured

**Bold** = Analyte Detected

deg C = degrees Celcius

mg/L =Milligram per liter

mS/cm = Micro

mV = Millivolts

NTU = Nephelometric Turbidity Units

ORP = Oxidation Reduction Potential

std units = standard units

</U = Analyte not detected above corresponding

laboratory reporting limit

$\mu\text{g/L}$  = Micrograms per liter

$\mu$ g = micrograms per mL

**Table 7**  
**Summary of Groundwater Analytical Results (February 2012)**  
**Cell 4: In-Situ Anaerobic Bio-Treatment Area**  
**Former Coke Oven Area Interim Remedial Measures**  
**RG Steel Sparrows Point, LLC**

Sample ID	Cell 4-7 02/17/12 10:40	Influent 02/14/12 12:20	Influent 02/14/12 15:58	Influent 02/15/12 8:37	Influent 02/15/12 13:06	Influent 02/15/12 16:46	Influent 02/16/12 9:00	Influent 02/16/12 13:21	Effluent 02/14/12 12:26	Effluent 02/14/12 16:02	Effluent 02/15/12 8:42	Effluent 02/15/12 13:10	Effluent 02/15/12 16:50	Effluent 02/16/12 9:04	
<b>Water Quality Parameters</b>															
Temperature	deg C	18.50	18.13	17.18	16.74	18.58	18.17	17.09	16.15	18.24	17.27	16.45	18.95	17.75	16.13
pH	std units	11.94	11.41	11.44	11.33	11.35	11.32	11.26	11.39	9.90	9.52	9.52	9.51	9.62	9.52
ORP	mV	-230	-162	-168	-153	-160	-158	-159	-156	-166	-154	-147	-143	-157	-143
Conductivity	mS/cm	2.42	1.61	1.66	1.71	1.68	1.68	1.74	1.76	1.53	2.25	2.11	2.27	2.21	2.62
Turbidity	NTU	0.88	1.11	0.60	0.95	1.27	2.25	1.41	0.36	7.92	42.9	30.2	53.0	427	124
Dissolved Oxygen	mg/L	0.00	4.42	4.19	4.96	3.81	3.66	4.25	4.93	3.26	4.55	3.86	4.66	3.26	6.01
<b>Volatile Organics</b>															
Vinyl Chloride	µg/L	< 500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
Chloroethane	µg/L	< 500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
1,1-Dichloroethene	µg/L	< 500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
Acetone	µg/L	< 12,000 U	--	--	--	--	--	--	--	--	--	--	--	--	--
Carbon Disulfide	µg/L	< 500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
Methylene Chloride	µg/L	< 2,500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
trans-1,2-Dichloroethene	µg/L	< 500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
1,1-Dichloroethane	µg/L	< 500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
2-Butanone (MEK)	µg/L	< 2,500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
Chloroform	µg/L	< 500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
1,1,1-Trichloroethane	µg/L	< 500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
Carbon Tetrachloride	µg/L	< 500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
Benzene	µg/L	1,000	--	--	--	--	--	--	--	--	--	--	--	--	--
1,2-Dichloroethane	µg/L	< 500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
Trichloroethene	µg/L	< 500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
1,2-Dichloropropane	µg/L	< 500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
Methyl Isobutyl Ketone (MIBK)	µg/L	< 2,500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
cis-1,3-Dichloropropene	µg/L	< 500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
Toluene	µg/L	580	--	--	--	--	--	--	--	--	--	--	--	--	--
trans-1,3-Dichloropropene	µg/L	< 500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
1,1,2-Trichloroethane	µg/L	< 500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
2-Hexanone (MBK)	µg/L	< 2,500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
Tetrachloroethene	µg/L	< 500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
Chlorobenzene	µg/L	< 500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
1,1,1,2-Tetrachloroethane	µg/L	< 500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
Ethylbenzene	µg/L	< 500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
Bromoform	µg/L	< 500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
1,1,2,2-Tetrachloroethane	µg/L	< 500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
Xylenes, Total	µg/L	< 1,500 U	--	--	--	--	--	--	--	--	--	--	--	--	--
<b>Semi-Volatiles</b>															
Naphthalene	µg/L	14,000	--	--	--	--	--	--	--	--	--	--	--	--	--
Total Volatile Organics	µg/L	15,580	--	--	--	--	--	--	--	--	--	--	--	--	--
<b>Wet Chemistry</b>															
Ferric Iron	mg/L	0.29	--	--	--	--	--	--	--	--	--	--	--	--	--
Ferrous Iron	mg/L	0.14	--	--	--	--	--	--	--	--	--	--	--	--	--
Nitrite-N	mg/L	0.088	--	--	--	--	--	--	--	--	--	--	--	--	--
Nitrate-N	mg/L	< 0.050 U	--	--	--	--	--	--	--	--	--	--	--	--	--
Nitrate/Nitrite-N	mg/L	< 0.050 U	--	--	--	--	--	--	--	--	--	--	--	--	--
Orthophosphate as P	mg/L	0.024	--	--	--	--	--	--	--	--	--	--	--	--	--
Sulfate as SO4	mg/L	700	--	--	--	--	--	--	--	--	--	--	--	--	--
Total Kjeldahl Nitrogen	mg/L	60	--	--	--	--	--	--	--	--	--	--	--	--	--
<b>Metals</b>															
Iron, Total	mg/L	0.43	--	--	--	--	--	--	--	--	--	--	--	--	--

Notes:

-- = Not Measured  
**Bold** = Analyte Detected  
deg C = degrees Celcius  
mg/L =Milligram per liter  
mS/cm = Microsiemens per Centimeter  
mV = Millivolts  
NTU = Nephelometric Turbidity Units  
ORP = Oxidation Reduction Potential  
std units = standard units  
</U = Analyte not detected above corresponding laboratory reporting limit  
µg/L = Micrograms per liter

**Table 8**  
**LNAPL Occurrence and Recovery**  
**Cell 6: LNAPL Recovery System in Former Benzol Processing Area**  
**Former Coke Oven Area Interim Remedial Measures**  
**RG Steel-Sparrows Point, LLC**

Well	LNAPL Occurrence During February 2012 (ft)	Total LNAPL Recovery Period		Cumulative Total LNAPL Recovered thru February 24, 2012 (d)		Estimated LNAPL Recovered During February 2012	
		Begin	End	(gal)	(lbs) (a)	(gal)	(lbs) (a)
RW-04	0.05 to 0.10	23-Jul-10	On-going (b)	967	7,088	14.1	103
BP-MW-05	0.77 to 1.08	28-Jan-10	On-going (b)	5,571	40,821	70.5	517
BP-MW-08	2.10 to 2.77	8-Sep-10	On-going (b)	318	2,327	2.3	17
BP-MW-11	none	23-Jul-10	8-Sep-10	7.8	57	0	0
RW-02	0.09 to 0.13	1/28/2011	On-going (c)	0.8	5.9	0	0
RW-03	0.19 to 0.34	11/24/2010	On-going (c)	4.0	29	0	0
RW-01	0.17 to 0.17	28-Oct-10	On-going (c)	1.3	10	0	0
BP-MW-10	0.22 to 0.47	na	na	0	0	0	0
BP-MW-07	0.09 to 0.12	na	na	0	0	0	0
RW-05	none	na	na	0	0	0	0
BP-MW-06	none	na	na	0	0	0	0
BP-MW-09	none	na	na	0	0	0	0
CO19-PZM004	none	na	na	0	0	0	0
<b>Total Recovery:</b>				<b>6,870</b>	<b>50,338</b>	<b>87</b>	<b>637</b>

Notes:

(a) Weight is calculated based on average BP-MW-05 and BP-MW-08 oil density of 0.878 grams per cubic centimeter, measured by EA (2009) by ASTM method D1481.

(b) Skimmer

(c) Bailing

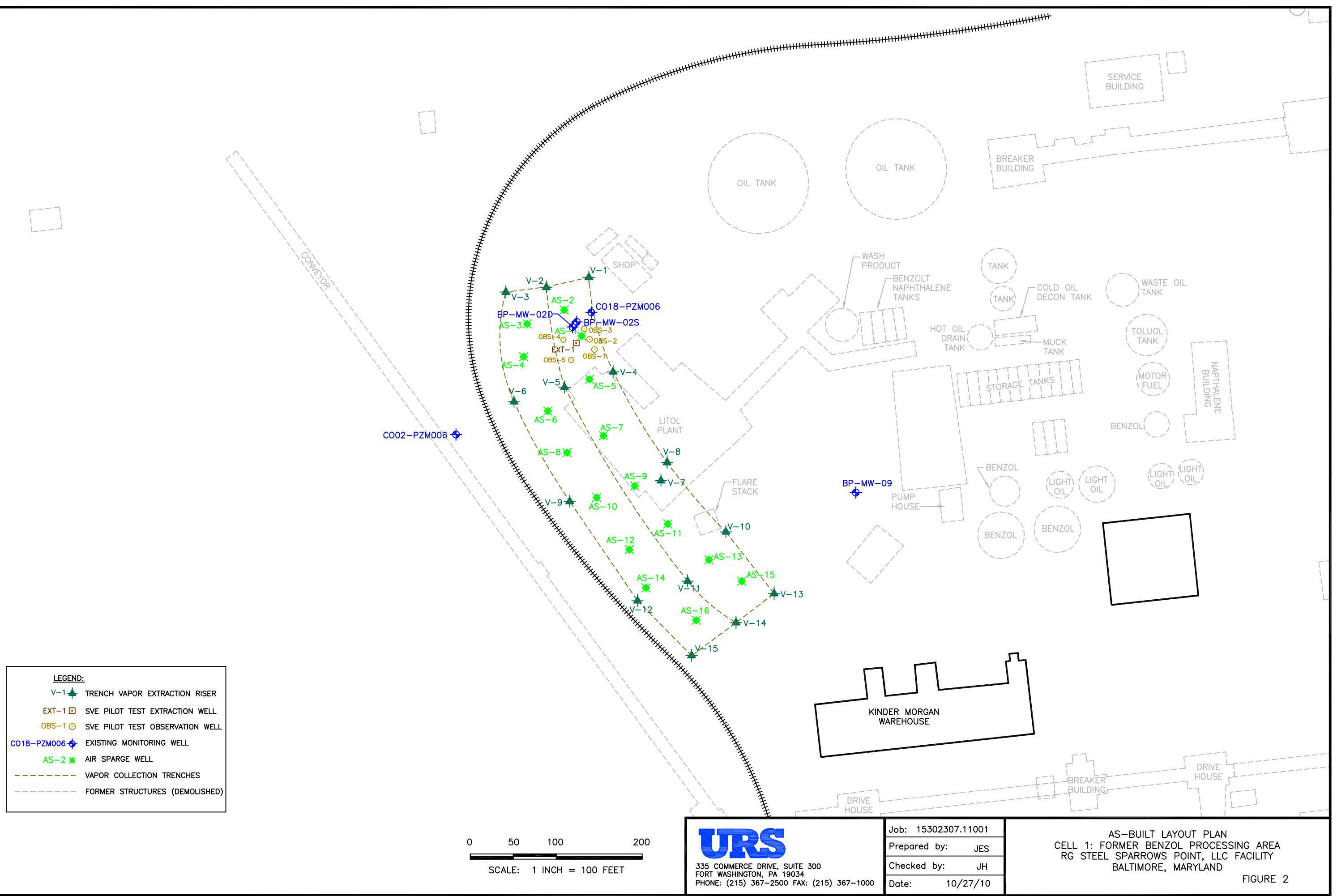
(d) Cumulative recovery volumes are calculated using an estimated recovery from 12/28/11 to 2/24/12.

**Table 9**  
**Depths (feet) to Water and LNAPL**  
**Cell 6: LNAPL Recovery System in Former Benzol Processing Area**  
**Former Coke Oven Area Interim Remedial Measures**  
**RG Steel-Sparrows Point, LLC**

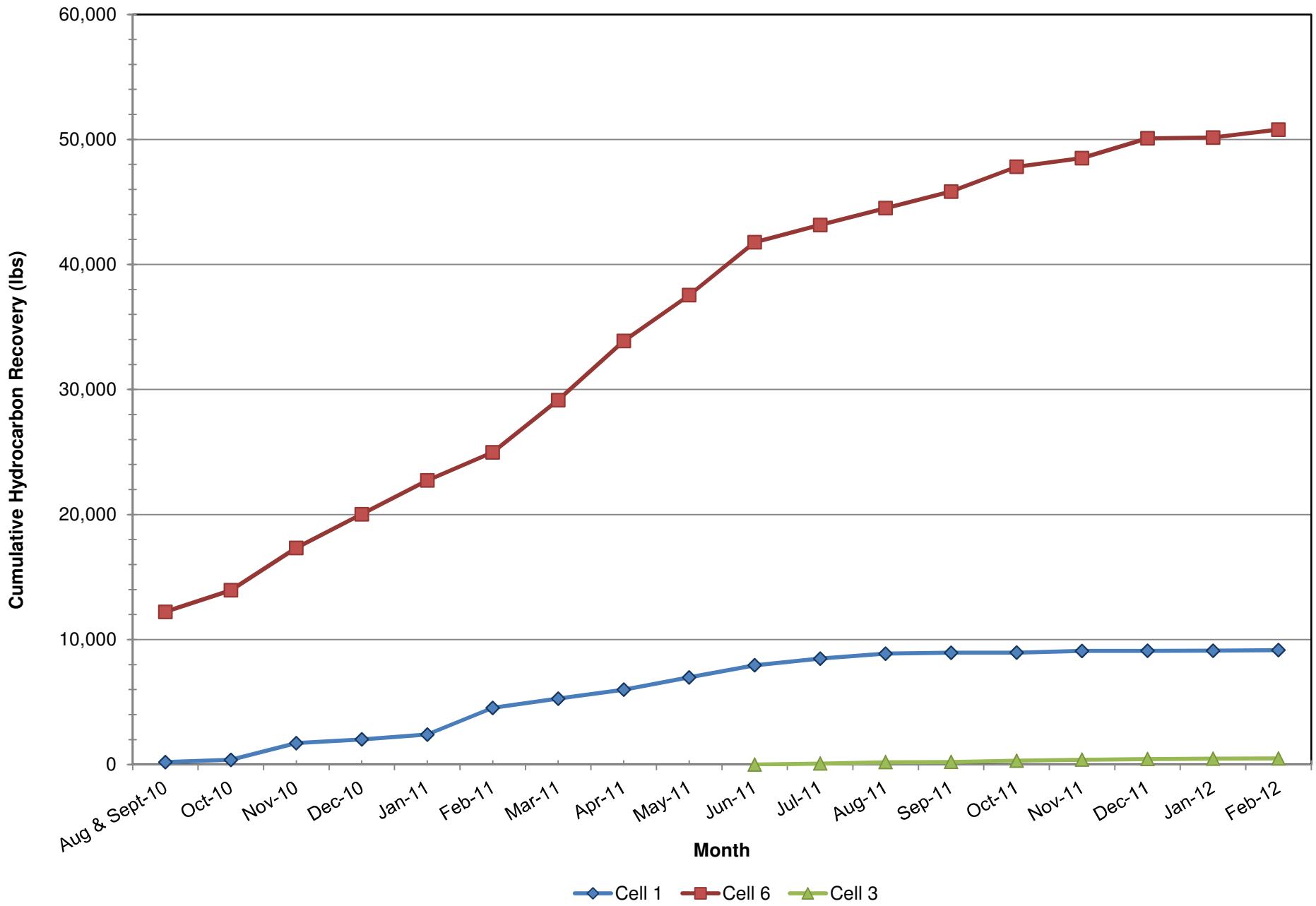
Date	RW-01			RW-02			RW-03		
	Depth to LNAPL	Depth to Water	LNAPL Thickness	Depth to LNAPL	Depth to Water	LNAPL Thickness	Depth to LNAPL	Depth to Water	LNAPL Thickness
2/7/2012	11.60	11.77	0.17	11.36	11.45	0.09	9.66	10.00	0.34
2/24/2012	11.89	12.06	0.17	11.75	11.88	0.13	10.01	10.20	0.19
<hr/>									
Date	RW-04			BP-MW-05			BP-MW-07		
	Depth to LNAPL	Depth to Water	LNAPL Thickness	Depth to LNAPL	Depth to Water	LNAPL Thickness	Depth to LNAPL	Depth to Water	LNAPL Thickness
2/7/2012	10.02	10.12	0.10	11.37	12.45	1.08	11.29	11.38	0.09
2/24/2012	10.35	10.40	0.05	11.72	12.49	0.77	11.60	11.72	0.12
<hr/>									
Date	BP-MW-08			BP-MW-10			BP-MW-11		
	Depth to LNAPL	Depth to Water	LNAPL Thickness	Depth to LNAPL	Depth to Water	LNAPL Thickness	Depth to LNAPL	Depth to Water	LNAPL Thickness
2/7/2012	12.13	14.90	2.77	8.77	8.99	0.22	11.37	11.37	0.00
2/24/2012	12.60	14.70	2.10	8.88	9.35	0.47	11.76	11.76	0.00

## **Figures**

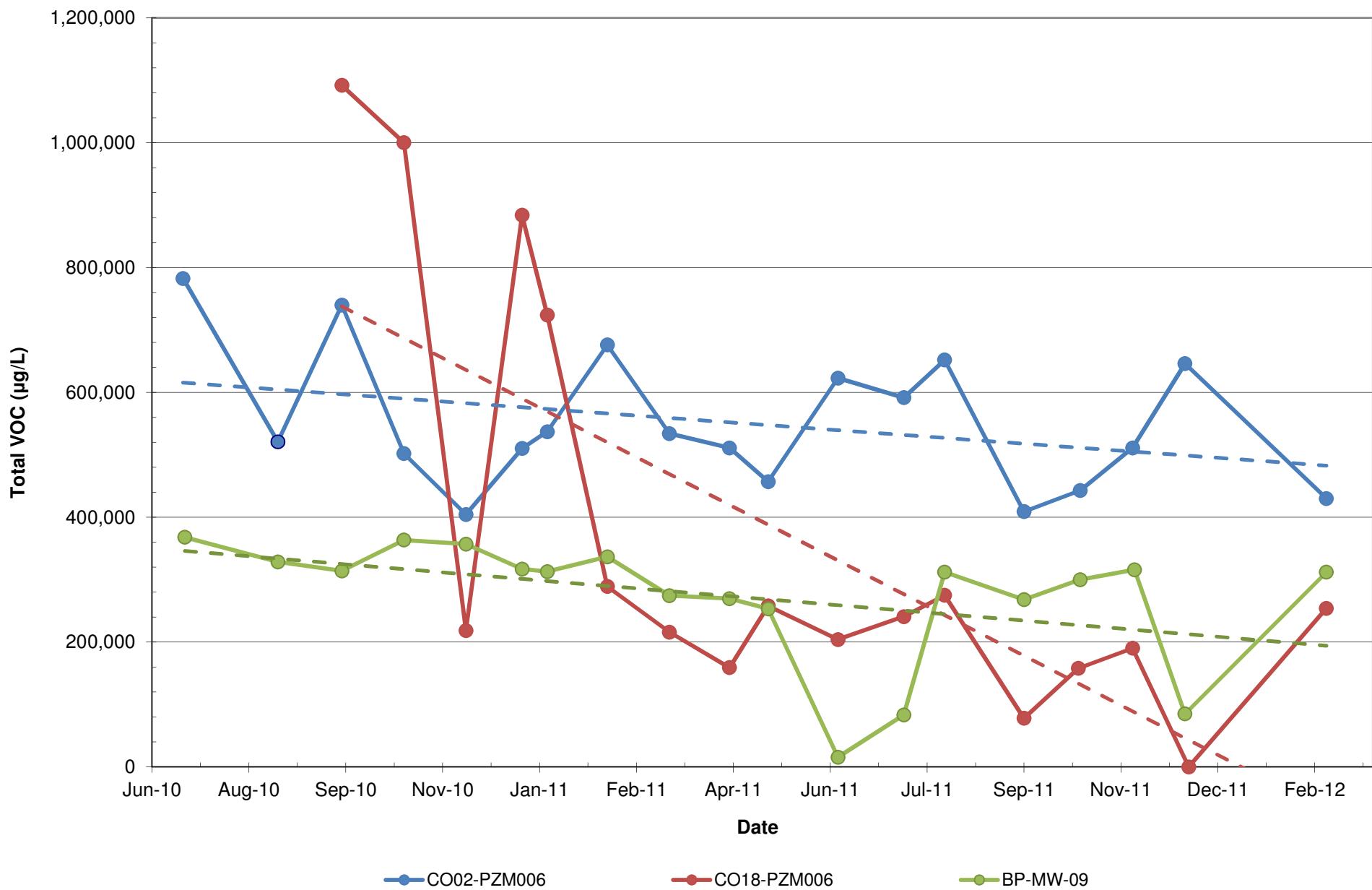




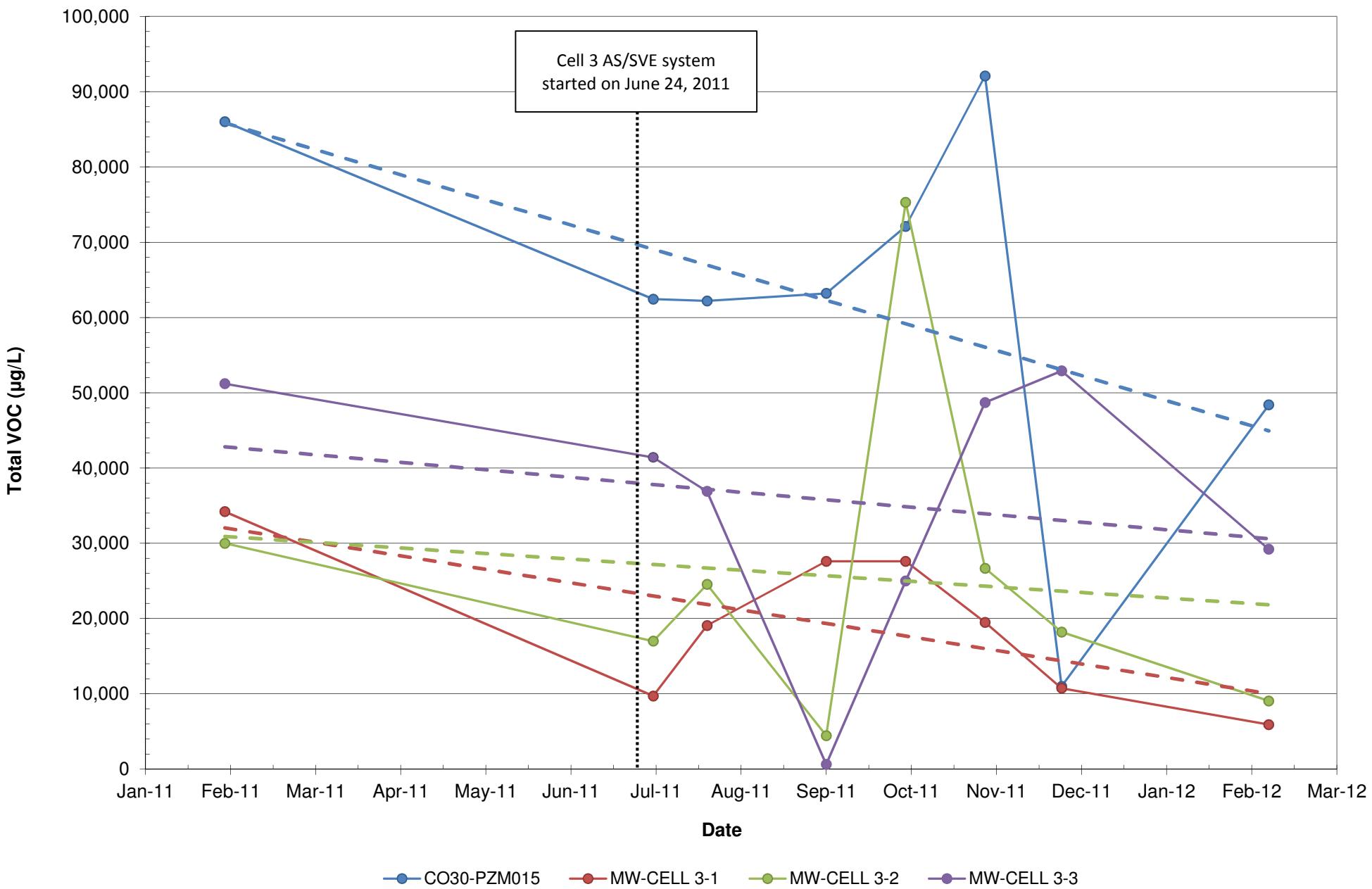
**Figure 3**  
**Cumulative Summary of Estimated Hydrocarbon Recovery**  
**Former Coke Oven Area Interim Remedial Measures**  
**RG Steel Sparrows Point, LLC**



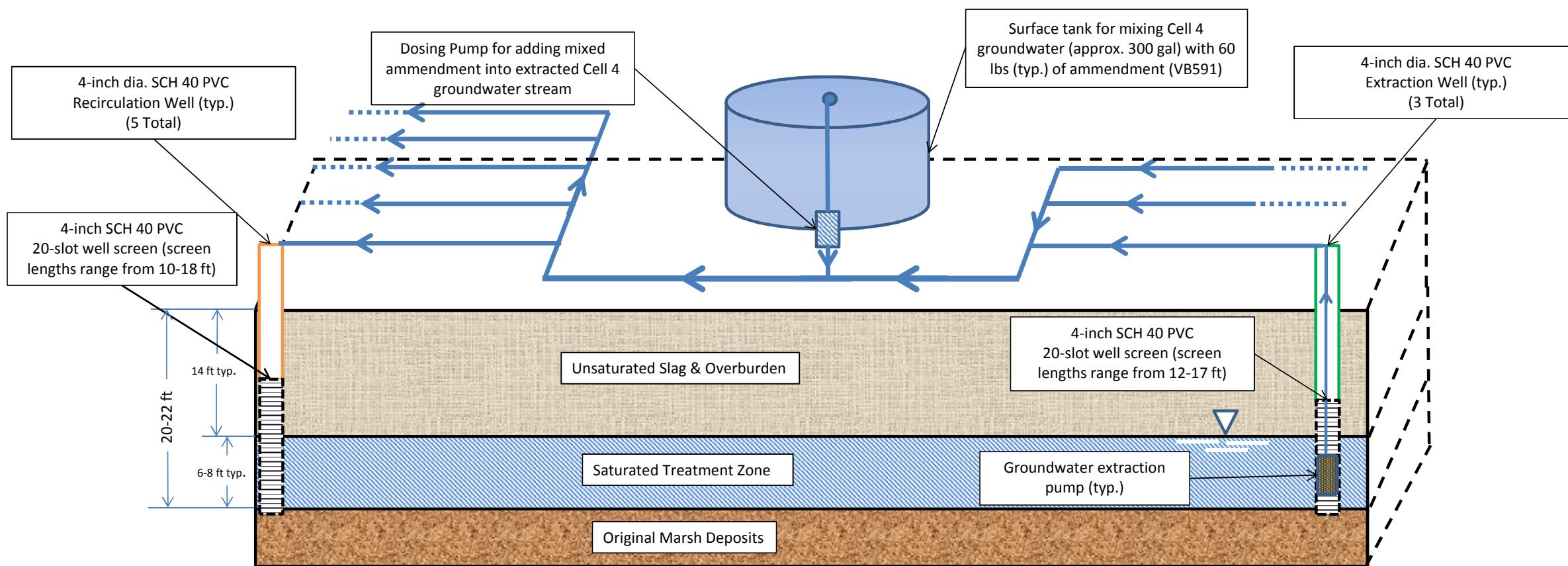
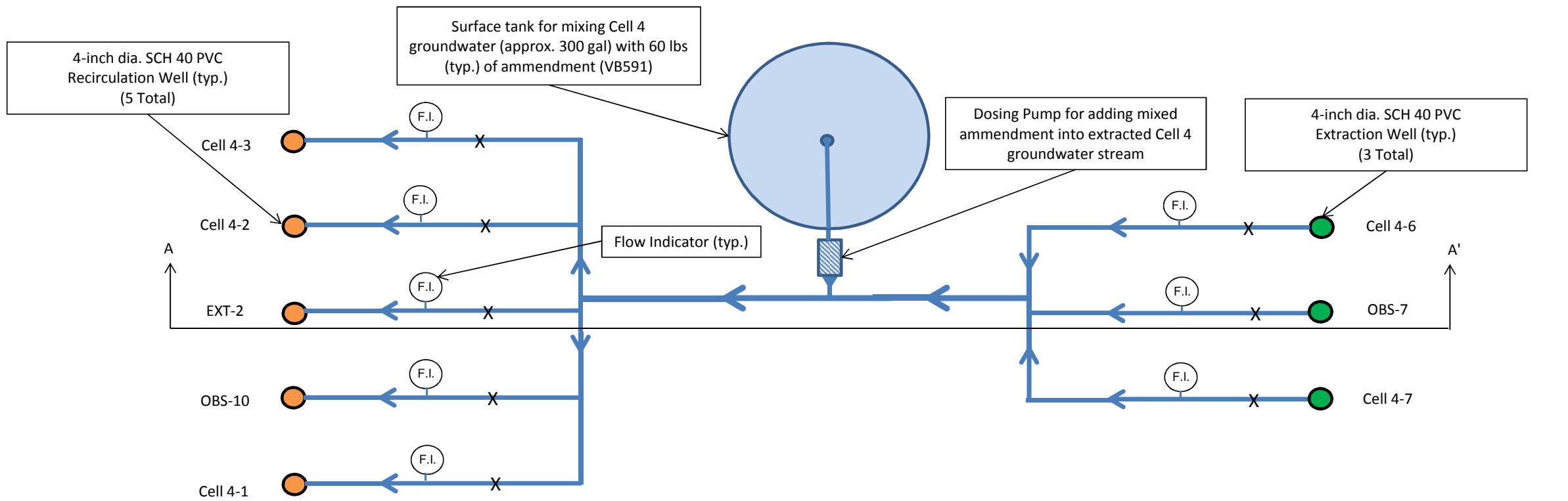
**Figure 4**  
**Measured Groundwater VOC Concentration by Month**  
**Cell 1: Prototype AS/SVE System in the "Cove" Area**  
**RG Steel Sparrows Point, LLC**



**Figure 5**  
**Measured Groundwater VOC Concentration by Month**  
**Cell 3: Prototype AS/SVE System in the "Cove" Area**  
**RG Steel Sparrows Point, LLC**



**Figure 6**  
**Schematic Layout and Sections**  
**Cell 4 In-Situ Anaerobic Bio-Treatment System**  
**Former Coke Oven Area Interim Remedial Measures**  
**RG Steel Sparrows Point, LLC**



Section A-A' (not to scale)

# Cell 4

In-Situ Anaerobic  
Bio-System

OBS-6  
Cell 4-2  
EXT-2  
OBS-10  
Cell 4-1  
Cell 4-4  
Cell 4-7  
OBS-9  
AS-2  
OBS-7  
Cell 4-3  
Cell 4-5  
Cell 4-6  
OBS-8

0 20 40 80 Feet

Image source: World Imagery, ESRI. GeoEye, 2009.

## Legend

- Extraction Well (Existing)
- Extraction Well (New)
- Recirculation Well (Existing)
- Recirculation Well (New)
- Monitoring Well (Existing)
- Monitoring Well (New)
- Groundwater Flow Direction

CLIENT Severstal Sparrows Point, LLC

LOCATION Baltimore, MD

**URS**

12420 Milestone Center Drive  
Germantown, MD 20876

GIS BY	JK/aer	11/18/2011
CHK BY	BE	11/18/2011
PM	BE	11/18/2011

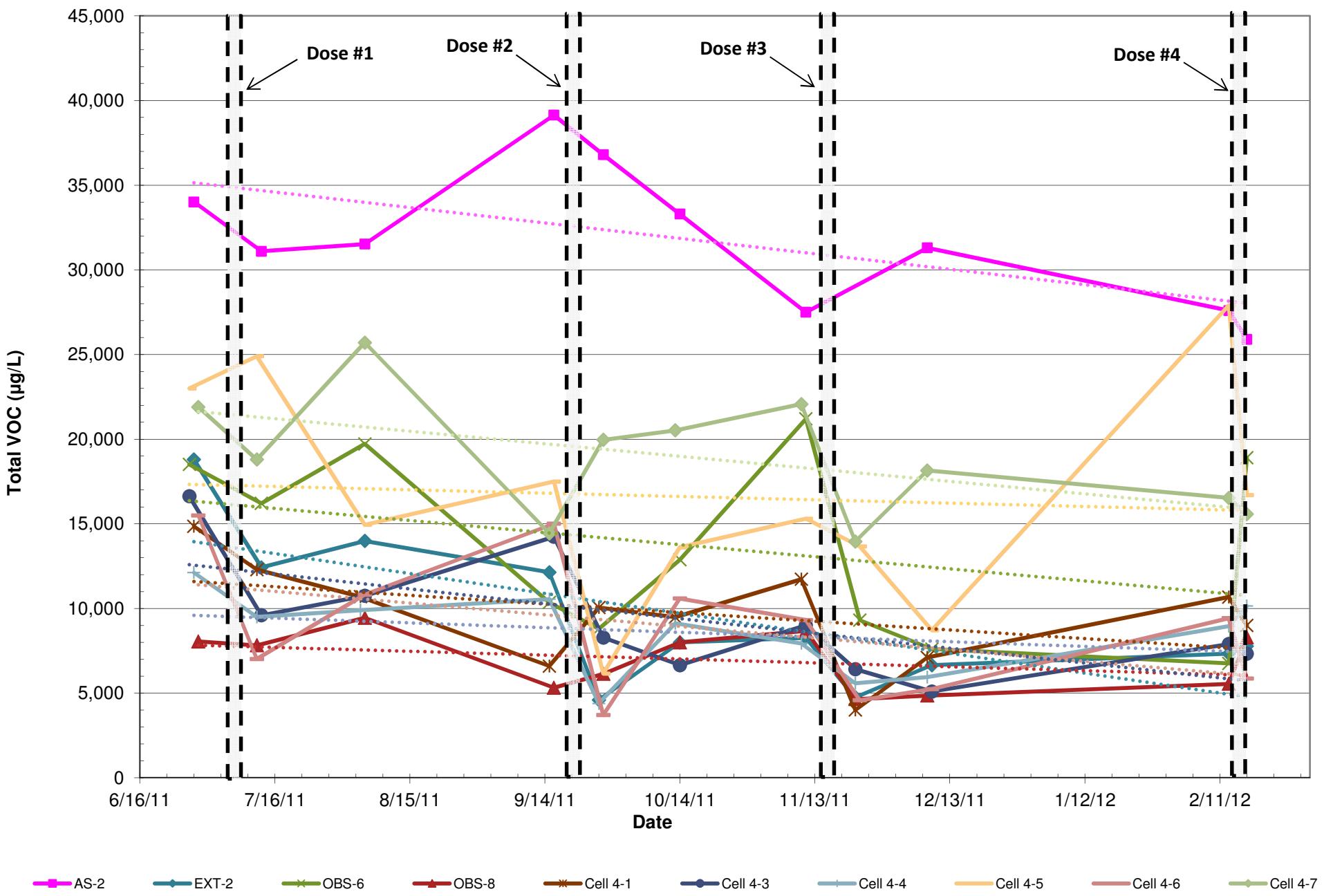


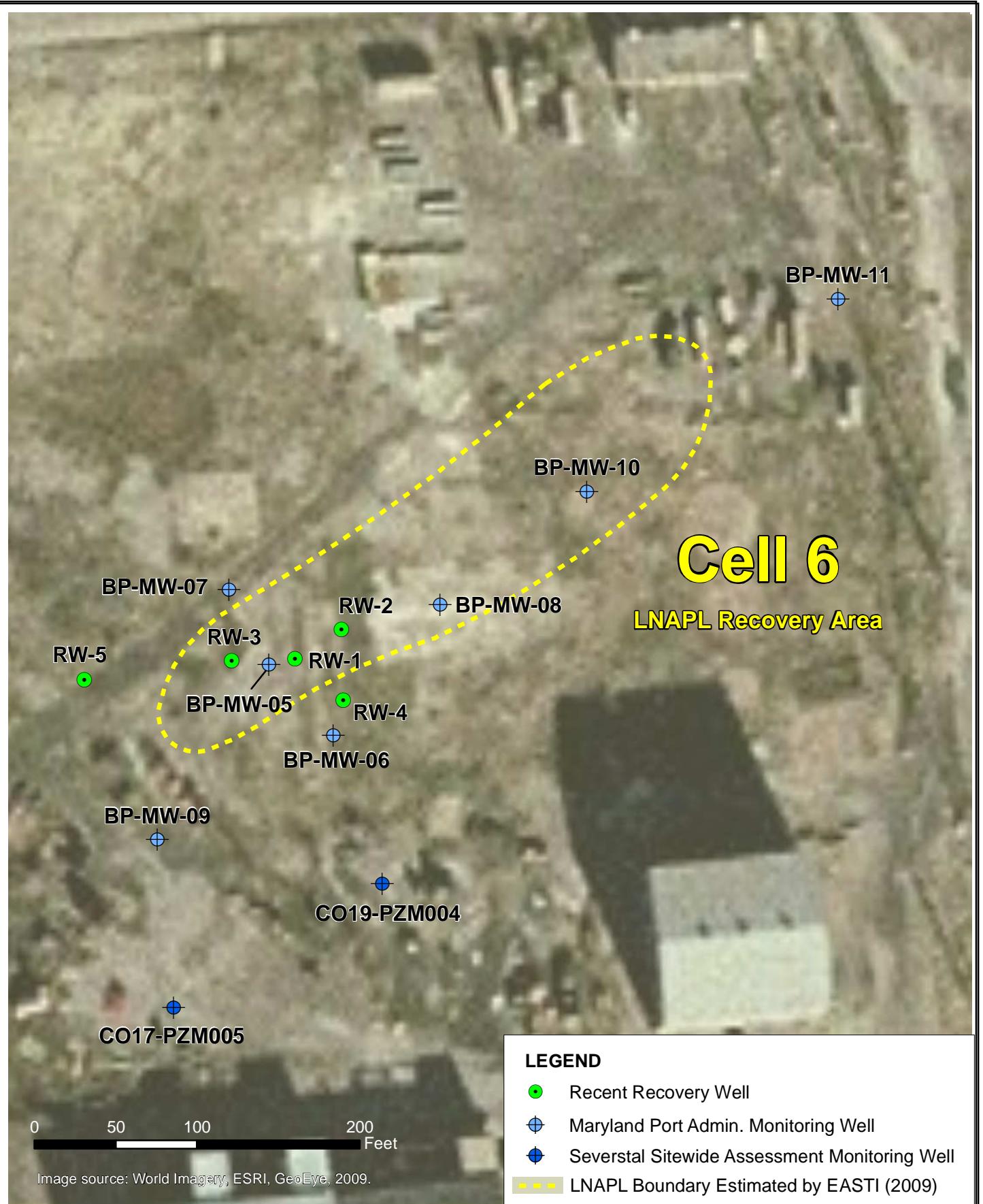
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**Figure 7**

**Cell 4 Wells**

**Figure 8**  
**Measured Groundwater VOC Concentration per Month**  
**Cell 4: In-Situ Anaerobic Bio-Treatment Area**  
**RG Steel Sparrows Point, LLC**





CLIENT	Sparrows Point		
LOCATION	Baltimore, MD		
<b>URS</b> 200 Orchard Ridge Drive Gaithersburg, MD 20878	GIS BY	JK	10/13/10
	CHK BY	BE	10/14/10
	PM	BE	10/14/10



**Figure 9**  
**LNAPL Monitoring and Recovery Wells**

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