



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

By Mail

September 4, 2013

Russell Becker
Vice President Remediation
Sparrows Point LLC
1650 Des Peres Road, Suite 303
St. Louis, Missouri 63131

Subject: Coke Oven Area Interim Measures Design Plan Cells 2 and 5

Dear Mr. Becker:

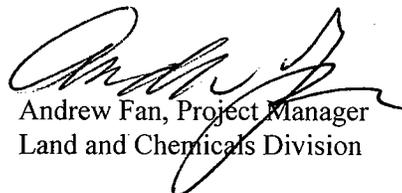
EPA hereby approves the Coke Oven Area Interim Measures Design Plan Cell 2 and 5 submitted by Sparrows Point LLC on August 6, 2013 in response to the US Environmental Protection Agency (EPA) Region III's May 6, 2013 letter requiring installation of Interim Measures at Cells 2 and 5, with the following modifying conditions:

1. Sparrows Point LLC shall install one shallow monitoring well in each of the areas circled on attached Figures 1-2 and 1-3 for Cells 2 and 4/5 to provide additional information on the impact on the groundwater flow by the reinjection trenches. The exact location of the monitoring points within the designated areas shown on the figures will be determined by Sparrows Point LLC based on field conditions and access restrictions.
2. Sparrows Point LLC shall include in each quarterly Interim Measures progress report a monthly summary and cumulative summary of the contaminant mass removed by groundwater pumping based on system influent concentrations (total VOCs) and flow rate for Cells 2 and 4/5 as well as the mass removal rate by air sparging at each cell, as currently reported for Cells 1 and 3.

The May 6, 2013 letter required the Interim Measures at Cells 2 and 5 to be operational within 90 days of approval. Based on a review of the schedule provided in the design plan and as discussed at the meeting on July 25, 2013, EPA accepts the revised proposed schedule set forth in the August 6, 2013 design plan. Sparrows Point LLC shall provide an update to EPA on the progress in implementing the proposed schedule at 90 and 120 days following receipt of this letter. If Sparrows Point LLC determines that it will not be able to meet the proposed schedule due to unforeseen circumstances, it must promptly notify EPA in writing as to the reason for the delay.

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

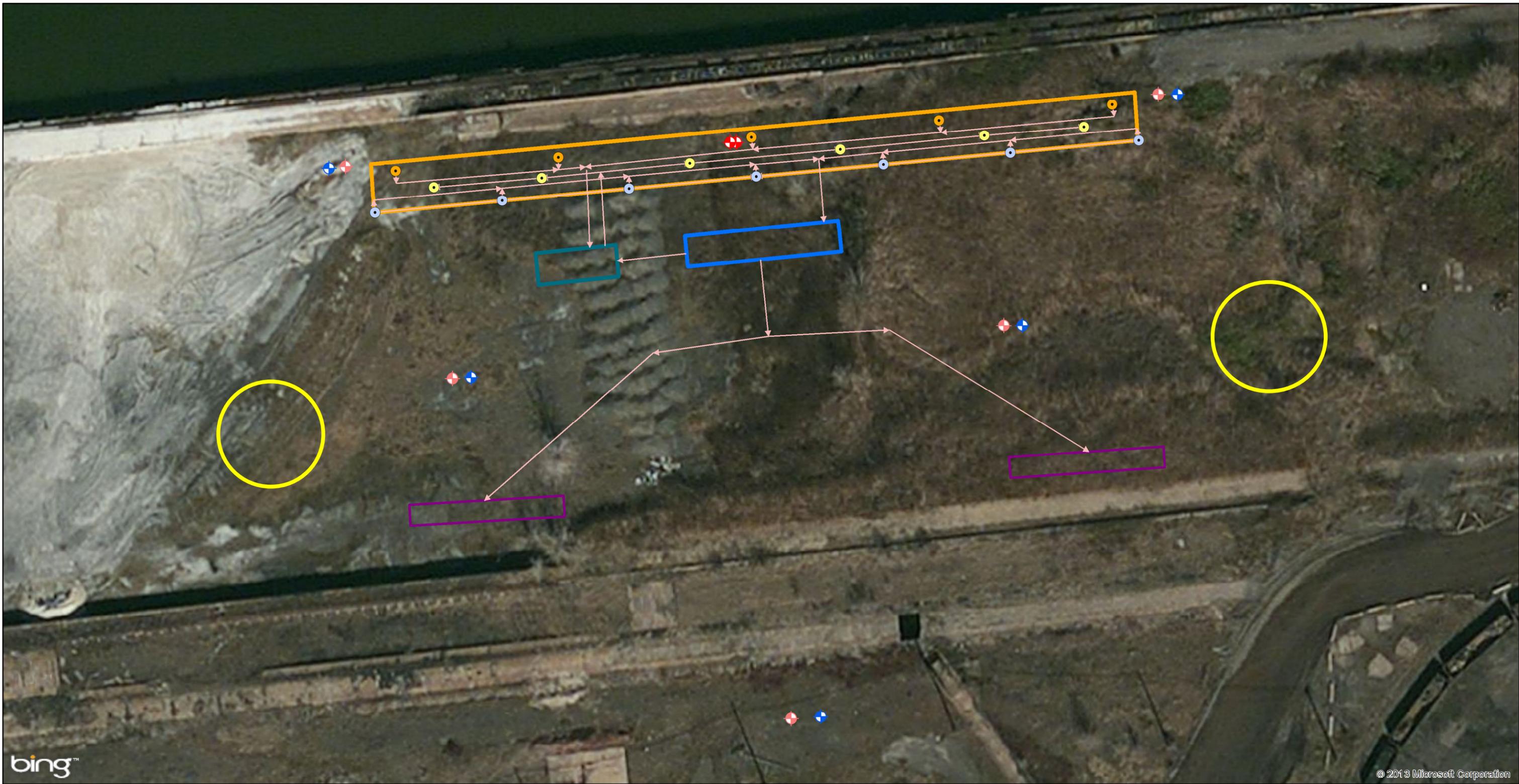
Sincerely,

A handwritten signature in black ink, appearing to read 'Andrew Fan', is written over the typed name and title.

Andrew Fan, Project Manager
Land and Chemicals Division

Attachment

cc: Barbara Brown, MDE

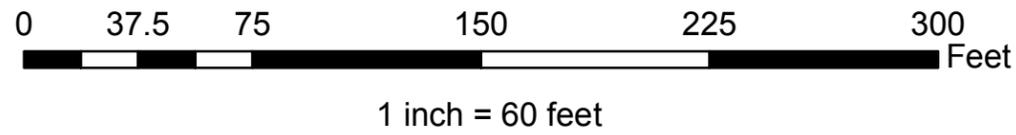


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Sparrows Point Former Coke Oven Area Interim Measures Cell 2 Site Plan & Cell Layout

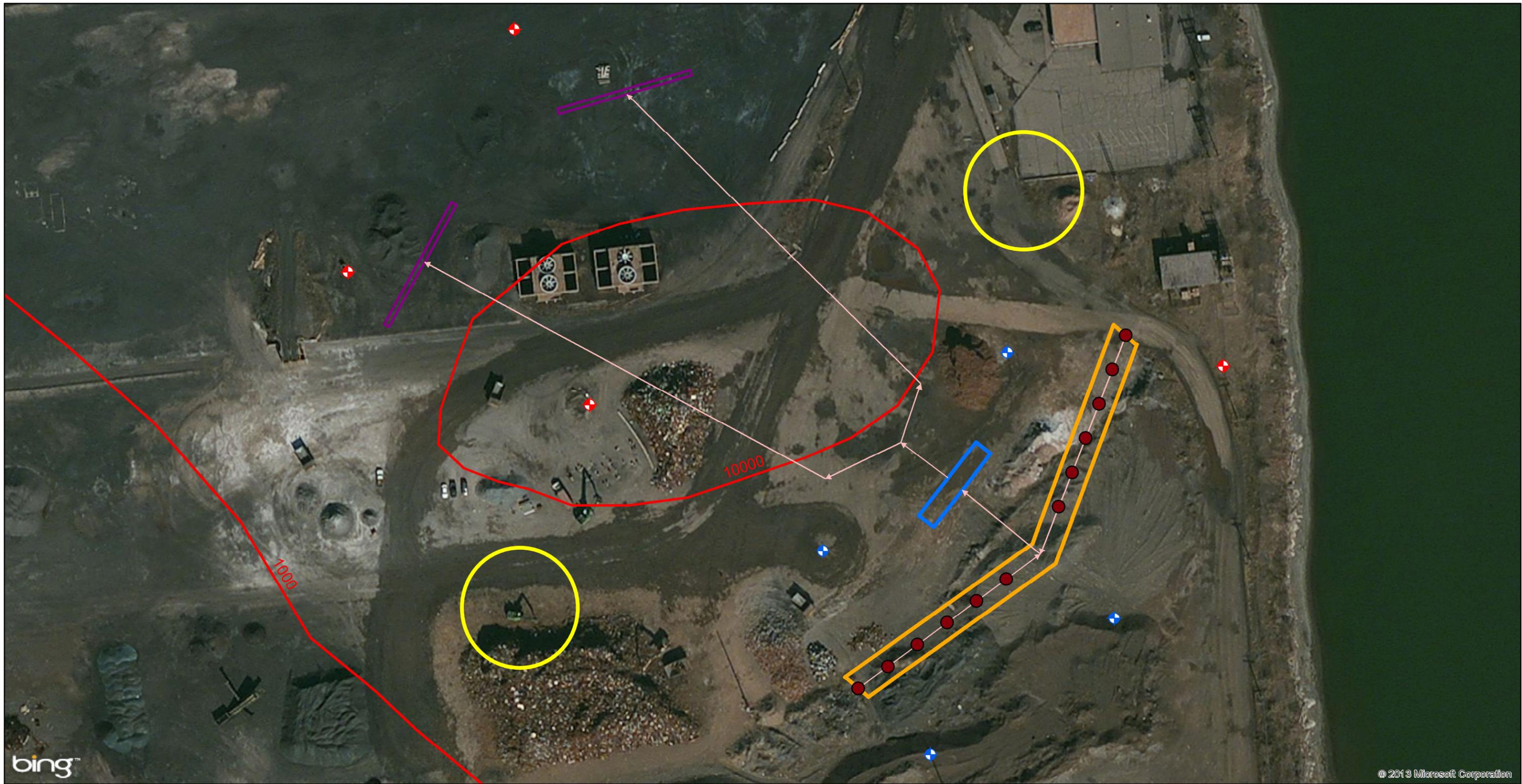


Legend

- ◆ Cell 2 Existing Monitoring Wells
- ◆ Proposed Monitoring Wells Shallow
- ◆ Proposed Monitoring Wells Intermediate
- Air Sparge Well
- SVE Recovery Riser
- Intermediate Zone Groundwater Recovery Well
- Piping
- ▭ AS/SVE Treatment Equipment
- ▭ Groundwater Treatment Equipment
- ▭ Re-Injection Trenches
- ▭ Extraction Zone

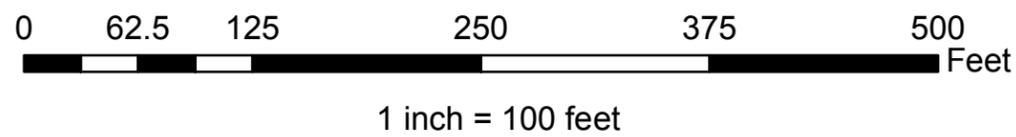


Figure 1-2



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Sparrows Point Former Coke Oven Area Interim Measures Cell 4/5 Site Plan & Cell Layout



- Legend**
- ◆ Cell 4 & 5 Existing Monitoring Wells
 - ◆ Proposed Monitoring Wells Shallow
 - Groundwater Extraction Wells
 - Piping
 - ▭ Groundwater Treatment Equipment
 - ▭ Re-Injection Trenches
 - ▭ Extraction Zone
 - Naphthalene Iso Concentration Shallow Zone

Figure 1-3