



May 14, 2013

Mr. Andrew Fan
US EPA Region III, 3LC20
1650 Arch Street
Philadelphia, PA 19103

Subject: Coke Oven Area Corrective Measures Study Work Plan

Dear Mr. Fan;

I am writing in regards to your May 6, 2013 letter that requests the installation of Interim Measures for Cells 2 and 5 at the former Coke Oven Area. Sparrows Point LLC had intended to design and implement a final remedy for the Coke Oven Area as soon as practical. The scope of the planned effort included interim measure activities that are consistent with our final remedial goals of aggressive source reduction and corrective measure study work to identify suitable technologies that when installed would control the migration of the dissolved plumes offshore. The source areas required some additional investigation to determine the extent of recoverable product; thus the exact nature of recovery method was to be determined as part of the work. Consistent with EPA guidance, there is study required before absolute specifics can be proposed for migration controls that might be necessary for a site and shoreline of this magnitude.

There was no intent to exclude work for Cells 2 and 5. We understood the priority of the dissolved plumes as originally identified in the EPA February 9, 2009 correspondence (issued prior to any "Cell" designation terminology) and planned to comprehensively address the migration of groundwater to surface water for the entire Coke Oven Area defined in the boundary map of the study area. The Workplan included the area of shoreline encompassed by Cells 2 and 5 and was geared to provide information to support the identification of appropriate corrective measures for the entire extent of dissolved plumes shown in the maps provided by U.S. EPA.

In sum, we withdraw the Coke Oven Area CMS Workplan and will pursue the project focused solely on Cells 2 and 5. The design plan for Cells 2 and 5 will be submitted within 90 days of receipt of your letter dated May 6, 2013. We will provide a schedule for the planning, procurement, construction and installation segment of this project with delivery of the design plan. Please contact me directly should you have questions.

Sincerely,

Russell Becker
Vice President, Remediation

Cc: Barbara Brown