



State of Ohio Environmental Protection Agency

*Covered  
Central  
Blair*

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October 2, 2008

Michael E. Long, Manager Environmental Compliance  
Mittal Steel USA, Inc.  
3250 Interstate Drive  
Richfield, Ohio 44286-9000

**Re: Mittal Steel USA, Inc.  
OHD004218673 - ISG Cleveland, Inc.  
OHD046203774 - ISG Cleveland West Properties, Inc.  
Notice of Violation**

Dear Mr. Long:

On September 24, 2008, I completed a review of the financial assurance documentation on file for the Mittal Steel USA, Inc. (Mittal) facilities referenced above. I evaluated the facilities for compliance with financial assurance and liability requirements set forth in the Ohio Administrative Code (OAC) rules 3745-55-42 through 3745-55-51.

On June 25, 2007, Ohio EPA received a financial assurance submittal from you consisting of a financial guarantee for closure, post-closure and liability coverage. The financial guarantee documentation for 2008 was due within 90 days of the end of your 2007 fiscal year which was December 31, 2007.

**Upon review of the financial assurance documentation, I found that Mittal has failed to submit financial assurance for closure and post-closure, in violation of OAC 3745-55-43 and OAC 3745-55-45 and had also failed to provide liability coverage in violation of OAC 3745-55-47.**

Area of concern: The financial guarantee and recitals submittal by you deviated from the required wording in several areas:

The Chief Financial Officers letter contains the following errors and/or omissions:

- "sudden" before "accidental" in the second paragraph;
- "identified above is" missing after "Firm" in the 3<sup>rd</sup> paragraph as well as sections 1., 2., 3., and 4;
- "Is" is missing after "Firm" in the 4<sup>th</sup> paragraph;
- "or liability coverage" is missing after "post-closure care" in sections 1., and 2; and
- "This firm is not required to file a Form 10K....." *I believe this is incorrect.*

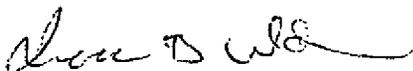
Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

The recitals contain the following errors and/or omissions:

- Guarantee for Closure or Post-closure Care: 3745-248 needs to be replaced
- with 3745-256 in section 4 and 8.
- Guarantee for Liability Coverage: 4(c)(2)(a) and (b) need to be replaced with
- 4(c)(2)(A) and (B).
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If you have any questions regarding this letter or financial assurance regulations, please feel free to call me at (614)644-3067.

Sincerely,



Isaac B. Wilder  
Compliance Assurance Section  
Division of Hazardous Waste Management

cc: Kristina Durnell, ITTS, DHWM  
Todd Surrena, DHWM, NEDO