



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

July 10, 2007

OHD 004 218 673
RTC of 6-12-07 NOV
Re: **Mittal Steel USA, Inc.**
OHD004218673 - ISG Cleveland, Inc.
OHD046203774 - ISG Cleveland West Properties, Inc.
Financial Assurance

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

Dear Mr. Long:

On June 13, 2007, I completed a review of the financial assurance documentation on file for the International Steel Group, Inc.'s (ISG) 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.

Upon review of the financial assurance documentation, I found that Mittal had 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.

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. With this submittal Mittal has **returned to compliance** for the violations of **OAC 3745-55-43, OAC 3745-55-45 and OAC 3745-55-47** cited in my June 12, 2007 notice of violation letter.

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

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 3rd paragraph as well as sections 1., 2., 3., and 4;
- "Is" is missing after "Firm" in the 4th 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.

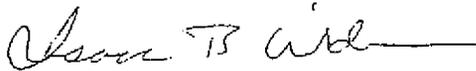
Michael E. Long
Manager Environmental Compliance
Mittal Steel USA, Inc.
Page 2 of 2

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).

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: Tammy McConnell, ITTS, DHWM
Todd Surrena, DHWM, NEDO

keyword: jms; Mittal Steel Group FRR 08

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with applicable regulations.