



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

**Richard E. Dunn, Director**

EPD Director's Office  
2 Martin Luther King, Jr. Drive  
Suite 1456, East Tower  
Atlanta, Georgia 30334  
404-656-4713

AUG 22 2018

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Gerdau Long Steel North America  
c/o Mr. Luis A. Nieves, Director Environment  
P.O. Box 31328  
Tampa, FL 33631

**Re: Voluntary Remediation Program Consent Order No. EPD-VRP-015**

**SoGreen Former Waste Pile Site**

HSI Site Number: 10142

Highland Avenue, Tifton, Tift County, GA

Tax Parcel ID#: T045 149; T046 002

**Parramore Fertilizer Site**

HSI Site Number: 10143

Highland Avenue, Tifton, Tift County, GA

Tax Parcel ID#: T046 001; T045 156

Dear Mr. Nieves:

An executed copy of Consent Order EPD-VRP-015 is enclosed. Consent Order EPD-HSR-003 and Consent Order EPD-HSR-003, Amendment No. 1 are now superseded in their entirety and replaced by the attached Order. EPD did not receive comments during the 30-day public comment period; therefore, the Order was executed as proposed. As specified in the Order, Gerdau Long Steel of North America (Gerdau), along with Owen Electric Steel Company of South Carolina a/k/a SMI Steel-South Carolina and U.S. Foundry & Manufacturing Corporation are accepted as participants and the above-referenced properties are now enrolled in the Voluntary Remediation Program (VRP). In accordance with Paragraph 13(a) of the Order, it is understood that Gerdau will transmit a copy of the Order to the other Respondents.

Please implement the voluntary investigation and remediation plans in accordance with the schedules and specifications contained therein and within the Order, and subject to comments in our October 31, 2017 letter. EPD anticipates receipt of the first VRP Progress Reports within six months of the date of this executed consent order. If you have any questions regarding the proposed Order or comments, please contact Robert Marbury at 404-463-7507.

Sincerely,

Richard E. Dunn  
Director

Encl: Consent Order EPD-VRP-015 (three copies)  
cc: Robert D. Mowrey - Kazmarek, Mowrey, Cloud, Laseter, (via email)  
File: 237-0031 (HSI# 10142-VRP); 237-0032 (HSI# 10143 – VRP)

**STATE OF GEORGIA  
DEPARTMENT OF NATURAL RESOURCES  
ENVIRONMENTAL PROTECTION DIVISION**

<b>IN RE:</b>	)	
	)	
<b>Gerdau AmeriSteel U.S. Inc.;</b>	)	
<b>Owen Electric Steel Company of</b>	)	
<b>South Carolina a/k/a SMI Steel-</b>	)	<b>Consent Order No. EPD-VRP-015</b>
<b>South Carolina; &amp;</b>	)	
<b>US Foundry &amp; Manufacturing</b>	)	
<b>Corporation</b>	)	
	)	
<b>RESPONDENTS</b>	)	

**CONSENT ORDER**

WHEREAS, the Parramore Fertilizer Site (the "PFS") (HSI No. 10143) is that portion of contiguous property affected by one or more historic releases exceeding a reportable quantity that occurred on the Parramore Parcel (Tax Parcel I.D. No. T046 001) and the Railroad Parcel (Tax Parcel I.D. No. T045 156);

WHEREAS, the SoGreen Waste Pile Site (SoGreen Site) (HSI No. 10142) is that portion of contiguous property affected by one or more historic releases exceeding a reportable quantity that occurred on the SoGreen Parcel (Tax Parcel I.D. No. T054 149) and the Barren Area (Tax Parcel I.D. No. T046 002);

WHEREAS, releases at the PFS and the SoGreen Site included hazardous substances under the Georgia Hazardous Site Response Act, O.C.G.A. Section 12-8-90 et seq., as amended ("HSRA");

WHEREAS, the PFS and SoGreen Sites were listed on the Hazardous Site Inventory ("HSI") on June 29, 1994 as site numbers 10143 and 10142 respectively;

WHEREAS, Respondents and the Environmental Protection Division (EPD) entered into HSRA Consent Order EPD-HSR-003 on September 8, 1993 (the "Consent Order"), and the Consent Order provided for Respondents to undertake certain work to address the SoGreen Site;

WHEREAS, Respondents and EPD revised the Consent Order obligations on April 15, 1998 with Consent Order EPD-HSR-003 Amendment No. 1 (the resulting amended Consent Order referred to herein as the "Amended Consent Order"), under which Amendment Respondents also agreed to undertake certain work to address the Barren Area portion of the SoGreen Site and the PFS;

WHEREAS, Respondents have horizontally delineated groundwater releases emanating from the PFS in a manner meeting the VRP Act and policies concerning delineation;

WHEREAS, Respondents removed more than 30,000 tons of soil from the PFS in accordance with a December 16, 1993 order issued by the United States Environmental Protection Agency (EPA), in accordance with remedial standards established in that order;

WHEREAS, historic correspondence between EPA and Respondents indicates that Respondents completed the performance of the work required under the 1993 order from EPA;

WHEREAS, the remaining work at the PFS under the Amended Consent Order pertains to groundwater remediation and monitoring, including in particular an identified plume of chlorinated volatile organic compounds;

WHEREAS, EPD and Respondents agree that a previously recommended approach to active remediation of PFS groundwater warrants reevaluation;

WHEREAS, with respect to the SoGreen Site, under the Consent Order, Respondents, as recited in the Amended Consent Order removed all “visually identifiable K061” materials and all material containing lead, cadmium, or chromium above TCLP values from and installed a clay cap including a synthetic liner over the SoGreen property;

WHEREAS, the soil in the capped area is subject to Ga. Comp. R. & Regs. 391-3-19-.06(7)(a)(1) and, in accordance therewith and with Ga. Comp. R. & Regs. 391-3-19-.06(7)(b), meets the delineation and cleanup standards applicable to soils under HSRA and the VRP Act upon execution of a Uniform Environmental Covenant (UEC);

WHEREAS, EPD concurred in 1999 with the conclusion in the Greenwood Cemetery Site Investigation Report (Jan. 7, 1999) that soil contamination on the Barren Area Parcel had been delineated, based on the results of the Barren Area Site Characterization (June 1996) and the Greenwood Cemetery Site Investigation (August 1998);

WHEREAS, chlorinated organic groundwater contaminants have been detected in groundwater at the SoGreen Parcel proximal to the historic landfill to the northeast of the SoGreen Parcel (the “Landfill Plume”) and the railroad to the west of the SoGreen Parcel (the “Railroad Plume”);

WHEREAS, Respondents currently have responsibility for the Landfill Plume or Railroad Plume under EPD-HSR-003, as amended, only if those Plumes emanate from the SoGreen Site;

WHEREAS, on May 8, 2017, the Respondents submitted to EPD an application, including a Voluntary Investigation and Remediation Plan (hereinafter the “VIRP”), for

enrollment of the SoGreen Site (i.e., the SoGreen Parcel and Barren Area) as qualifying properties into the Georgia Voluntary Remediation Program (hereinafter the “VRP”), established under the Georgia Voluntary Remediation Program Act, O.C.G.A. Section 12-8-100 et seq., as amended (hereinafter “VRP Act”);

WHEREAS, on May 8, 2017, the Respondents submitted to EPD an application, including a VIRP, for enrollment of the PFS (i.e., the Parramore Parcel and Railroad Parcel) as qualifying properties into the VRP, established under the VRP Act;

WHEREAS, the VIRPs set forth plans to address the PFS and SoGreen Sites under the principles and policies of the VRP Act in lieu of the provisions of the Amended Consent Order;

WHEREAS, EPD has determined that the PFS and SoGreen Site are eligible for enrollment into the VRP;

WHEREAS, the Respondents and EPD desire to enable Respondents’ participation in the VRP with respect to the PFS and SoGreen Site; and

NOW, THEREFORE, it is hereby ORDERED by the Director and CONSENTED to by the Respondents, as follows:

1. As to the Respondents, the Consent Order and Amended Consent Order are hereby terminated and replaced in their entirety by this Order. The date this Order is executed by the Director is the “Effective Date.”
2. Upon the Effective Date, Respondents’ VRP applications for the PFS and the SoGreen Site and VIRPs for each Site are approved, and the above-referenced PFS and SoGreen properties are hereby separately enrolled in the VRP.
3. Respondents shall comply with the following schedule for submission of the compliance status report for the PFS, subject to modifications and extensions granted in writing by EPD, such modifications and extensions not to be unreasonably denied, and subject to the convention that any due date falling on a Saturday, Sunday, or State of Georgia holiday shall be deemed to fall on the next regular business day:
  - a. Respondents shall submit progress reports regarding the PFS to EPD semi-annually, or at such longer interval as EPD may approve, pursuant to Section 12-8-107(b) of the VRP Act, as amended, with the first report due six (6) months after the effective date of this Order.
  - b. Within three (3) months of the discovery of regulated substance(s) associated with a release emanating from the PFS Parcel or Railroad Parcel on a non-enrolled property, Respondents shall either (1) apply to EPD to include such property as an enrolled property under the VRP Act, if Respondents want to include such property as an enrolled property under the VRP Act, (2) notify EPD of a plan and timetable to include such

property as an enrolled property under the VRP Act, or (3) notify EPD that such property is not included under the VRP Act.

- c. Within twenty four (24) months after the date of execution of this Order, the Respondents shall complete horizontal delineation in soil of any release or associated constituents of concern emanating from the PFS or Railroad Parcel and extending onto property, if any, for which access was not available as of the date of execution of this Order.
- d. Within six (6) months of the date of the Effective Date, Respondents shall complete the PFS Soil Sampling Plan included in the PFS VIRP, and Respondents shall include the results of and recommendations based on the sampling in the next progress report that is due more than 60 days after the receipt of all validated sampling data.
- e. Within 30 months of the date of the Effective Date, the Respondents shall (i) update the PFS groundwater CSM (including vertical delineation); (ii) conclude reevaluation of potential remedial options with respect to the PFS groundwater; (iii) finalize the PFS VIRP; and (iv) provide a cost estimate for implementation of any remaining PFS corrective actions to groundwater and to soil, including without limitation costs of monitoring attenuation of groundwater constituents.
- f. Within 60 months after the date of the Effective Date, or other later date approved in writing by EPD, e.g., if EPD concurs that completion of corrective action cannot feasibly be achieved within 60 months after the date of the Effective Date, the Respondents shall submit the compliance status report concerning PFS, including the requisite certifications, required under the VRP Act.

4. Respondents shall comply with the following schedule for submission of the compliance status report for the SoGreen Site, subject to modifications and extensions granted in writing by EPD, such modifications and extensions not to be unreasonably denied:

- a. Respondents shall submit progress reports regarding the SoGreen Site to EPD semi-annually, or at such longer interval as EPD may approve, pursuant to Section 12-8-107(b) of the VRP Act, as amended, with the first report due six (6) months after the effective date of this Order.
- b. Within three (3) months of the discovery of regulated substance(s) associated with a release emanating from the SoGreen Parcel or Barren Area on a non-enrolled property, Respondents shall either (1) apply to EPD to include such property as an enrolled property under the VRP Act, if Respondents wants to include such property as a enrolled property under the VRP Act, (2) notify EPD of a plan and timetable to include such

property as an enrolled property under the VRP Act, or (3) notify EPD that such property is not included under the VRP Act.

- c. Within fourteen (14) days of the date of the Effective Date, Respondents shall commence their efforts to obtain access from the City of Tifton, Tift County, CSX, and potentially additional parties as needed to implement the SoGreen Site Hydrology Evaluation as described in the SoGreen Site VIRP.
- d. Within twelve (12) months of the date of the Effective Date, Respondents shall submit a report, within a regularly scheduled progress report or otherwise, to EPD on the SoGreen Site Hydrology Evaluation evaluating whether either the Landfill Plume or the Railroad Plume emanate from the SoGreen Site based on the data collected from properties to which Respondents received access to conduct the Evaluation.
- e. Within six (6) months of the date of the Effective Date, Respondents shall complete the Barren Area Soil Sampling Plan included in the SoGreen VIRP, and Respondents shall include the results of and recommendations based on the sampling in the next progress report that is due more than 60 days after the receipt of all validated sampling data.
- f. If the data collected within twelve (12) months of the date of the Effective Date do not show that the Landfill Plume and/or Railroad Plume emanate from the SoGreen Parcel, (1) Respondents shall negotiate in good faith with EPD and any persons identified by EPD as persons who contributed to or are contributing to those releases (within the meaning of HSRA) to participate in addressing the Plume(s) to cleanup standards applicable under the VRP Act and (2) absent such an additional agreement, Respondents shall have no responsibility under this Order for such Plume(s) and shall not be considered by EPD, in relation to such Plume(s), to be a “person who has contributed or who is contributing to a release” within the meaning of O.C.G.A. § 12-8-92(9) unless additional information subsequently developed, provided to, or obtained by EPD demonstrates that Respondents have that status. Further, in that event, Respondents will have fully satisfied their obligations under this Order for the SoGreen Site upon the Director’s concurrence with Respondents’ certification that all aspects of the SoGreen Site comply with cleanup standards as applicable under the VRP Act, other than with respect to the Plumes for which Respondents are not responsible by virtue of this Paragraph 4.f.
- g. For SoGreen Site soils and whichever (if either) of the Landfill and/or Railroad Plumes emanate from the SoGreen Parcel, Respondents shall, by the latter of thirty (30) months of the date of the Effective Date or twelve (12) months after receiving any requisite access rights, (i) complete horizontal and vertical delineation of groundwater (soils having been



delineated already); (ii) update the SoGreen Site CSM; (iii) finalize the SoGreen Site VIRP; and (iv) provide a cost estimate for implementation of remaining SoGreen Site corrective actions, if any, to groundwater and soil, including without limitation costs of monitoring attenuation of groundwater constituents.

- h. Within sixty (60) months after the date of the Effective Date, or other later date approved in writing by EPD, e.g., if EPD concurs that completion of corrective action cannot feasibly be achieved within sixty (60) months after the date of the Effective Date, the Respondents shall submit the compliance status report concerning the SoGreen Site soils and whatever aspects of SoGreen Site groundwater for which it has responsibility under Paragraph 4(f), including the requisite certifications, required under the VRP Act.

5. Within sixty (60) days after the date of execution of this Order, the Respondents shall submit a cost estimate to EPD to complete the work proposed in Section 5 of each VIRP. This estimate shall be based upon independent third party costs. Whenever an updated VIRP is submitted to EPD, Respondents shall also submit to EPD an updated cost estimate within sixty (60) days.

6. Within ninety (90) days after the date of execution of this Order, and also within ninety (90) days of any submission of an updated VIRP to EPD, the Respondents shall provide EPD a financial assurance mechanism to reflect all costs identified in the most recent cost estimate available under Condition 5. The financial assurance mechanism shall be submitted and maintained on such forms as specified by EPD and shall be subject to EPD's acceptance. The written cost estimate shall be reviewed at least annually by the Respondents to ensure that the amount of the financial assurance mechanism is sufficient to ensure performance of the activities described in the VIRP most recently submitted to EPD. If the cost estimate indicates the amount of the financial assurance mechanism is not sufficient to ensure performance of those activities, the Respondents shall notify EPD within thirty (30) days.

7. The Respondents and one or more registered professional geologists or engineers shall be responsible to oversee the implementation of the PFS and SoGreen Site VIRPs in accordance with the provisions, purposes, standards, and policies of the VRP Act, as amended. EPD may, at its sole discretion, review and comment on documents submitted by the Respondents. However, failure of EPD to respond to a submittal within any timeframe does not relieve the Respondents from complying with the specified schedule and the provisions, purposes standards and policies of the Act and Order.

8. The Respondents must address EPD's comments dated October 31, 2017 and any comment letters addressing the investigation and remediation pursuant to the VRP Act to the extent such comments are not inconsistent with the terms of this Order, and the Respondents must do so in a manner that satisfies the provisions, purposes, standards, and policies of the VRP Act.

9. EPD's approval of the PFS and/or SoGreen VIRPs extends only to those technical aspects of the document that expressly require EPD approval under applicable rules and statutes. This approval is not an endorsement by EPD that it accepts as conclusive any representations made in the document. Nor does EPD guarantee or warrant that the document is free of errors or omissions. EPD may later withdraw approval of the PFS and/or SoGreen Site VIRPs in whole or in part if EPD determines that the conditions precedent to its authority to terminate enrollment under O.C.G.A. § 12-8-107(d) are satisfied.

10. For any enrolled property, this Order shall terminate if and as of the date the Director concurs under Section 12-8-107(e) of the VRP Act, as amended, with the Respondents' certification that the property complies with applicable VRP cleanup standards. Further, if the Respondents are not responsible for one or both Plumes as described in Paragraph 4.f, the Order shall terminate for the SoGreen Parcel as described in this Paragraph 10 upon the Director's concurrence that the SoGreen Parcel complies with applicable VRP cleanup standards in all respects other than the Plumes for which Respondents are not responsible by virtue of Paragraph 4.f. Upon any termination of this Order for a property under this Paragraph 10, EPD shall also remove the property from the HSI.

11. Enrollment of a property in the VRP and coverage of such property under this Order shall terminate (hereinafter the "Termination Date") sixty (60) days after either the Director or the Respondents provide written notification to the other party that enrollment in the VRP is being terminated, as provided in Section 12-8-107(d) of the VRP Act, for the property. In the event of a termination under this Paragraph, and subject to Respondents' rights, including under Section 12-8-107(g)(3) of the VRP Act, as of the Termination Date the property that was subject to the termination shall, subject to the operation of Paragraph 4(f), be subject to the terms and conditions of HSRA and the termination shall also be considered a written request for a CSR (and/or in Respondents' sole discretion a Corrective Action Plan) under Ga. Comp. R. & Regs. 391-3-19-.06(3) with a requested response date ninety (90) days after the Termination Date.

12. If this Order is terminated or modified for one or more properties under Paragraphs 10, 11 or otherwise, that termination or modification shall have no bearing on the terms, force, or effect of this Order on the properties for which the Order was not terminated or modified.



13. Unless otherwise provided in this Order, as amended, the following notice provisions shall apply:

- a. Notifications, submissions or other communications required by this Order, shall be made in writing and addressed as follows:

As to the Respondents:

Luis A. Nieves  
Director,,Environment  
Gerdau Long Steel North America  
P.O. Box 31328  
Tampa, Florida 33631

with a copy to:

Robert D. Mowrey  
Kazmarek Mowrey Cloud Laseter LLP  
1230 Peachtree St. NE  
Suite 3600  
Atlanta, GA 30309

As to EPD:

Response and Remediation Program  
Attn: Program Manager  
Georgia Environmental Protection Division  
2 Martin Luther King Jr. Drive  
Suite 1054  
Atlanta, Georgia 30334

- b. Either party may, by written notice to the other party, change its designated representatives for receipt of notice or its notice address.
- c. For purposes of the deliverables referenced in Paragraphs 3 and 4 hereof, EPD's receipt of a deliverable by the specified milestone due date via U.S. Mail, courier or hand delivery, or EPD's receipt of an electronic transmittal of a copy of the deliverable by the specified milestone due date confirming that the deliverable has been sent via U.S. Mail, courier or hand delivery, shall constitute timely submission of the deliverable.

14. The individual signing this Order for the Respondents is duly authorized to enter into and bind the Respondents to the terms of the Order.

15. Within sixty (60) days after Respondents' receipt from EPD of an invoice for any reasonable costs to EPD in reviewing the VRP application and subsequent

documents that exceed the initial VRP application fee, Respondents shall reimburse EPD for such costs, provided the invoice includes a reasonably detailed itemization and justification of those costs.

16. For purposes of enforcement under any applicable State Law, this Order shall be construed as and shall have the same force and effect as a final Order of the Director pursuant to HSRA, as amended, and the VRP Act, as amended. Any deadline included in this Order shall be understood as providing that the subject obligation shall be fulfilled by the time specified herein or by a later specified time determined in writing by EPD. Requests for EPD to use this discretion must be made in writing a minimum of fourteen (14) days prior to the otherwise applicable deadline. EPD shall notify the Respondents of the approval or denial of the request in writing within five (5) days of the request and shall not unreasonably deny the request. If EPD fails to so notify the Respondents, the request shall be deemed approved.

17. Force majeure. Failure to complete a condition mandated by this Order or within the time period specified in accordance with Paragraph 13 will be excused and not subject Respondents to enforcement action if the failure is the result of a force majeure event as identified in this Paragraph and Respondents comply with the requirements set forth in this Paragraph. Respondents shall have the burden of proving that they were rendered unable, wholly or in part, by force majeure to carry out their obligations.

- a. The term "force majeure" as used herein shall be limited to the following: Act of God; strike, lockout, or other labor or industrial disturbance not caused by an unfair labor practice by the Respondents; act of the public enemy; war; blockade; public riot; fire; storm; flood; explosion; failure to secure timely and necessary federal, state, or local approvals or permits, provided such approvals or permits have been timely and diligently sought; or other delay caused by unforeseeable circumstances beyond the reasonable control of Respondents, their employees, agents, consultants, or contractors. Force Majeure does not include financial inability to perform an obligation required by this Consent Order or a failure to achieve compliance with applicable regulatory permits.
- b. Respondents shall notify the Division verbally within 48 hours (or no later than noon of the next business day if the expiration of the 48 hours occurs on a weekend or holiday) from the time Respondents learn, or in the exercise of reasonable diligence should have learned, of any force majeure circumstances that may reasonably be expected to cause a schedule or performance delay. Within 10 days of such time, Respondents shall submit to the Division a written notice as to the anticipated length (if known) and cause of any delay due to force majeure. Failure to so notify the Division shall constitute a waiver of any claim to force majeure for the period of time between the time such notification was due and when it was actually provided.

- c. The Respondents and the Division agree to negotiate informally and in a good faith attempt to identify and reach resolution on delays resulting from force majeure. In the event that any circumstance or series of circumstances involving force majeure cause the schedule to extend over thirty (30) calendar days, Respondents and the Division shall meet to assess the overall schedule impact and attempt to mitigate the same.
- d. If force majeure has occurred, the affected time for performance specified in this Order shall be extended for a period of time equal to the delay resulting from such force majeure. Respondents shall exercise due diligence and adopt reasonable measures to avoid or minimize any delay.

18. By entering into, or taking any action in accordance with, this Order, the Respondents do not admit any fact, conclusion of law, or allegation contained in the Order, including without limitation that any Respondents is a “person who contributed to a release” within the meaning of HSRA for any release at the PFS or SoGreen Site. Nor does entry of this Order represent or reflect a conclusion by the Director that any Respondent is a “person who contributed to a release or is contributing to a release” within the meaning of HSRA for any release at the PFS or SoGreen Site. The Respondents do not admit liability for any purpose, nor admit any liability or responsibility for the conditions at the PFS or SoGreen Site, any allegation of negligence, wrongdoing, or fault relating to the PFS or SoGreen Site, or any allegation of wrongful conduct relating to the PFS or SoGreen Site under any federal, state, or local laws or regulations.

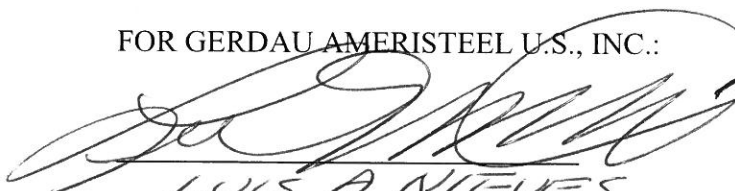
*[Signatures appear on following pages.]*

This Consent Order shall be signed first by the Respondents and shall be deemed executed when signed by the Director of EPD.

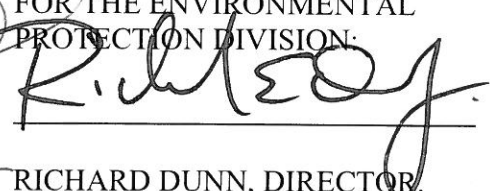
It is so ORDERED, CONSENTED, AND AGREED to this 22 day of August, 2018  
(to be filled in by the Director upon his signature).

FOR GERDAU AMERISTEEL U.S., INC.:

FOR THE ENVIRONMENTAL  
PROTECTION DIVISION:

  
BY: LUIS A NIEVES  
DIRECTOR, ENVIRONMENT

OFFICE: TAMPA, FL

  
RICHARD DUNN, DIRECTOR,  
EPD  
DEPARTMENT OF NATURAL  
RESOURCES

FOR OWEN ELECTRIC STEEL  
COMPANY OF SOUTH CAROLINA  
A/K/A SMI STEEL – SOUTH  
CAROLINA:

\_\_\_\_\_  
BY: \_\_\_\_\_

OFFICE: \_\_\_\_\_

FOR U.S. FOUNDRY & MANUFACTURING  
CORPORATION:

\_\_\_\_\_  
BY: \_\_\_\_\_

OFFICE: \_\_\_\_\_

This Consent Order shall be signed first by the Respondents and shall be deemed executed when signed by the Director of EPD.

It is so ORDERED, CONSENTED, AND AGREED to this 22 day of August, 2018  
(to be filled in by the Director upon his signature).

FOR GERDAU AMERISTEEL U.S., INC.:

\_\_\_\_\_

BY: \_\_\_\_\_

OFFICE: \_\_\_\_\_

FOR THE ENVIRONMENTAL  
PROTECTION DIVISION:



RICHARD DUNN, DIRECTOR,  
EPD

DEPARTMENT OF NATURAL  
RESOURCES

FOR OWEN ELECTRIC STEEL  
COMPANY OF SOUTH CAROLINA  
A/K/A SMI STEEL – SOUTH  
CAROLINA:



BY: BRAD BREDEZEN

OFFICE: DIRECTOR OF ENVIRONMENTAL

FOR U.S. FOUNDRY & MANUFACTURING  
CORPORATION:

\_\_\_\_\_

BY: \_\_\_\_\_

OFFICE: \_\_\_\_\_

This Consent Order shall be signed first by the Respondents and shall be deemed executed when signed by the Director of EPD.

It is so ORDERED, CONSENTED, AND AGREED to this 22 day of August, 2018  
(to be filled in by the Director upon his signature).

FOR GERDAU AMERISTEEL U.S., INC.:

\_\_\_\_\_

BY: \_\_\_\_\_

OFFICE: \_\_\_\_\_

FOR THE ENVIRONMENTAL  
PROTECTION DIVISION:



RICHARD DUNN, DIRECTOR,  
EPD  
DEPARTMENT OF NATURAL  
RESOURCES

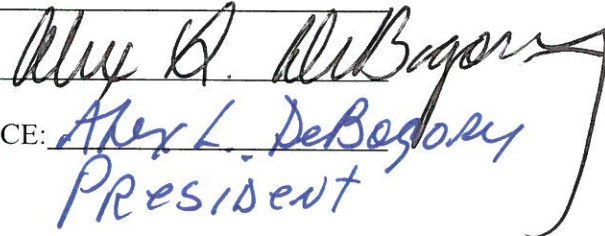
FOR OWEN ELECTRIC STEEL  
COMPANY OF SOUTH CAROLINA  
A/K/A SMI STEEL – SOUTH  
CAROLINA:

\_\_\_\_\_

BY: \_\_\_\_\_

OFFICE: \_\_\_\_\_

FOR U.S. FOUNDRY & MANUFACTURING  
CORPORATION:

BY: 

OFFICE: Alex L. DeBogory  
President