OHIO RIVER PARTNERS, LLC
1331 Broad Avenue, Suite 100
Findlay, Ohio 45840

U.E.P.A.
S.E.D.O.
2013 APR -5 PM 12: 12

April 4, 2013

Ms. Melody Stewart
Division of Materials and Waste Management
Ohio Environmental Protection Agency
Southeast District Office
2195 Front Street
Logan, Ohio 43138

Re: RG Steel Wheeling, LLC Property – Approximately 10 acres, Martins Ferry, Ohio (See Drawing attached to this Letter as Exhibit A)

Dear Ms. Stewart:

Ohio River Partners, LLC, an Ohio limited liability company is negotiating with RG Steel Wheeling, LLC, a Delaware limited liability company concerning the purchase by ORP of the above referenced property currently owned by RG (the "RG Site"). RG is one of multiple debtors-in-possession in a jointly administered Chapter 11 Case pending in the U.S. Bankruptcy Court for the District of Delaware (Case No. 12-11661(KJC)).

ORP has commenced its due diligence concerning the RG Site, inclusive of its environmental due diligence. The environmental due diligence included soil and groundwater sampling as documented in the attached report by Civil & Environmental Consultants, Inc. (CEC) dated April 3, 2013.

As indicated in the report, dissolved cadmium was detected in four (4) of the seven (7) groundwater samples. Concentrations of cadmium ranged from 13.6 micrograms per liter to 89.8 micrograms per liter. These four (4) samples are above the Maximum Contaminant Level (MCL) standards for drinking water established by the U.S. EPA and also exceed the Ohio VAP Generic Unrestricted Potable Use Standard.

CEC's report also shows that the groundwater flow was generally to the west-southwest, *away from* the Martins Ferry Municipal Well Field which is located east/northeast of the RG Site.

ORP has shared the foregoing information with the Martins Ferry Municipal Water Authority.

Upon acquiring the RG Site, ORP intends to operate the RG Site for a limestone storage, off-loading, and transfer yard. None of ORP's intended uses involve or contain cadmium. ORP also understands and will comply with its use and reporting obligations prescribed by an Environmental Covenant on the RG Site.

Please call me at (419)424-5662 Ext. 1406 if Ohio EPA has concerns or requires additional information from us relating to the RG Site.

Sincerely,

R. Dan Mapes
Ohio River Partners. LLC.

April 4, 2013

Mr. Robert Mapes
Ohio River Partners, LLC
1331 Broad Avenue, Suite 100
Findlay, Ohio 45840

2013 APR -5 PM 12: 12
U.E.P.A.
S.E.D.O

Dear Mr. Mapes:

Subject: Soil and Groundwater Sampling Results
Approximately 10-Acre Parcel
North End of Former RG Steel Property
1001 Main Street
Martins Ferry, Ohio
CEC Project 122-509

Pursuant to your request, Civil & Environmental Consultants, Inc. (CEC) performed soil and groundwater sampling as part of Ohio River Partners, LLC's (ORP's) due diligence prior to potential acquisition of an approximately 10-acre parcel of land at the north end of the former RG Steel Wheeling, LLC (RG Steel) plant in Martins Ferry, Ohio. CEC understands that ORP is negotiating with RG Steel concerning purchase of the above-referenced property currently owned by RG Steel (the "10-Acre Parcel"). RG Steel is one of multiple debtors-in-possession in a jointly administered Chapter 11 Case pending in the U.S. Bankruptcy Court for the District of Delaware (Case No. 12-11661(KJC)). The location of the 10-Acre Parcel is depicted on Figure 1.

The work was performed in general conformance with ASTM International (ASTM) E1903-11 *Standard Guide for Environmental Site Assessments: Phase II Environmental Site Assessment Process*. The primary objectives of this work were to provide sufficient information regarding subsurface conditions to assist ORP in making informed business decisions concerning the 10-Acre Parcel, and to provide the level of knowledge necessary to satisfy one of the landowner liability protections under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (42 U.S.C. §9601). As such, the work performed for this effort included performing a series of five (5) soil borings, collecting and analyzing soil samples,

converting one (1) soil boring to a monitoring well, and collecting groundwater samples from the newly-installed monitoring well and six (6) existing monitoring wells as described below. The existing monitoring wells were previously installed by others for purposes of investigating a 1990 release from petroleum underground storage tanks (USTs) in support of a No Further Action (NFA) letter from the Bureau of Underground Storage Tank Regulations (BUSTR). These tanks were located to the south of the 10-acre parcel.

The 10-Acre Parcel is comprised of an irregular-shaped parcel of vacant land located in an industrial portion on the northeast side of Martins Ferry, Ohio. A concrete slab associated with a demolished building, former railroad lines, and scrap concrete/rubble piles are present on the 10-Acre Parcel. The land use in the immediate vicinity of the property consists of an existing limestone yard to the north; a municipal well field to the east; building slabs to the south; and railroad lines to the west. The former RG Steel plant is located immediately south. The City of Martins Ferry Well Field is located approximately 150-feet to the east of the 10-Acre Parcel. The site layout is depicted on Figure 2.

1.0 SCOPE OF WORK

CEC performed the following field activities to complete this work:

- Advancement of five soil borings (SB-4 through SB-7 and MW-21) on the southwestern portion of the 10-Acre Parcel;
- Collection of soil cores continuously in all boring locations and field screening of the soil samples in the field for the presence of total volatile organic compounds (VOCs);
- Laboratory analysis of two soil samples from each soil boring for VOCs, eight Resource Conservation and Recovery Act (RCRA) metals, and Polycyclic Aromatic Hydrocarbons (PAHs) (MW-21 only);
- Installation, development, and sampling of one monitoring well (MW-21) on the southwestern portion of the 10-Acre Parcel; and,
- Collection of groundwater samples from monitoring wells MW-8S, MW-8D, MW-17, MW-19, and MW-20 MW-15 and MW-21 for laboratory analysis of VOCs and RCRA metals. The sample from MW-21 was also analyzed for PAHs.

All work was performed in accordance with industry-accepted practices and following generally accepted quality assurance/quality control (QA/QC) protocol. Samples were analyzed at Pace Analytical Services, Inc. (Pace) in Indianapolis, Indiana. All samples were shipped to the

laboratory in iced coolers under chain-of-custody protocol. Locations of the soil borings and monitoring wells are depicted on Figure 2.

2.0 RESULTS

2.1 Lithology

Lithology encountered during drilling generally consisted of a surficial cinder fill layer underlain by tan to dark brown sandy clay. Directly beneath this layer was 12 to 20 feet of inter-bedded tan, sandy clay, as well as fine-grained sand lenses that varied from moist to wet. At least 22 feet of tan to brown sand and gravel was identified directly beneath this layer. This sand and gravel layer was also moist to wet. Bedrock was not encountered during drilling. Copies of the borehole logs from this investigation are provided in Attachment A.

2.2 Depth to Groundwater and Field Parameters

Groundwater was generally encountered between 28 feet below ground surface to 38 feet bgs. Groundwater level data was collected from the monitoring wells using an electronic water level indicator referenced to the top of the inner PVC casing of the well. The presence of two aquifers was indicated in previous Tier 1 and Tier 2 investigations associated with the BUSTR NFA letter. Groundwater flow in the shallow zone was generally to the west and groundwater flow in the deeper alluvial aquifer was to the west-southwest.

Water level data from this work also indicated a westward component to groundwater flow. This flow direction varies from the anticipated flow, which would be toward the Ohio River. This variation could be due to seasonal variations in groundwater flow or influence due to surface water/groundwater interaction with the Ohio River. Further evaluation of groundwater flow was beyond the scope of this work. Water-level elevation data from this investigation are provided in Table 1. Groundwater flow direction is depicted on Figure 3.

Field parameters including temperature, pH, and conductivity were collected at the time of groundwater sampling. Groundwater temperature was within expected values, ranging from approximately 14.0 degrees Celcius (°C) to 15.9 °C. Conductivity values were also within anticipated values, ranging from approximately 580 to 1785 micromhos per centimeter (umhos/cm). pH values were slightly lower than neutral in four wells (MW-8S, MW-8D, MW-17 and MW-19), with values ranging from approximately 4.32 to 5.63. Copies of groundwater sampling logs are provided in Attachment B.

2.3 Laboratory Analyses

2.3.1 Soil

Soil samples from all of the soil borings except MW-21 were analyzed for VOCs and RCRA metals; soil samples from MW-21 were analyzed for VOCs, RCRA metals and PAHs. Two samples per soil boring were collected. The shallow sample was designated with an "A" (collected at 0 to 2 feet) and the deep sample was designated with a "B" (collected above the water table).

The only VOC detected in the soil samples was carbon disulfide, detected at 0.0146 milligrams per kilograms (mg/kg) in the shallow soil sample collected from MW-21. Carbon sulfide is a common laboratory artifact. Arsenic, barium, chromium and lead were detected in all of the soil samples. Cadmium was detected in three of the soil samples; selenium was detected in only one of the samples, and mercury was detected in two of the samples. Silver was not detected in any of the soil samples. Several PAH compounds were detected in the shallow soil sample collected from MW-21; however there were no PAHs detected in the deeper soil sample from MW-21. All of the results were well below applicable Ohio EPA Voluntary Action Program (Ohio VAP) Generic Direct-Contact Standards for Commercial/Industrial land use. Soil analytical results are summarized in Table 2. Copies of the laboratory analytical reports are provided in Attachment C.

2.3.2 Groundwater

Groundwater samples were collected from seven monitoring wells and analyzed for VOCs and dissolved RCRA metals. MW-21 was sampled for PAHs in addition to VOCs and dissolved RCRA metals. There were no detections of any VOCs in all seven monitoring wells and there were no detections of PAHs in MW-21. Dissolved cadmium was detected in four of the seven groundwater samples (MW-8S, MW-8D, MW-17 and MW-19) [NOTE: these are the four wells which exhibited slightly lower than neutral pH levels – See Section 2.2 above]. Concentrations ranged from 13.6 micrograms per liter (µg/L) to 89.8 µg/L. These four samples were above the Maximum Contaminant Level (MCL) standards for drinking water established by the U.S. EPA and also exceeded the Ohio VAP Generic Unrestricted Potable Use Standard (UPUS) of 5 µg/L. Groundwater analytical results are summarized in Table 3. Copies of the laboratory analytical reports are provided in Attachment C.

3.0 DISCUSSION

Based upon the information generated during this work, the following summarizes results of the investigation:

- Groundwater flow direction is away from the Martins Ferry Municipal Well Field.
- All of the laboratory results from the analyses of the soil samples were below the applicable Ohio VAP generic direct-contact standards.
- No VOCs were detected in any of the groundwater samples.
- PAHs were detected in the shallow soil sample collected and analyzed from MW-21; all of the results were below the applicable Ohio VAP generic direct-contact standards.
- Dissolved cadmium exceeded the Ohio VAP Generic UPUS of 5 µg/L in four of the seven groundwater samples. These four wells also showed pH values slightly lower than neutral.

Further evaluation of the source for the cadmium in the four groundwater samples was beyond the scope of this investigation; however, the following can be inferred based on the data:

- Soil analytical results do not indicate a potential on-site source;
- The westward groundwater flow could indicate a potential source to the east; and
- the lower than neutral pH values associated with the four wells identifying cadmium could influence the elevated concentration of the cadmium in these wells.

4.0 CLOSING

We appreciate the opportunity to provide environmental services to Ohio River Partners. Should you have any questions regarding the information in this report, please don't hesitate to contact us at 614-540-6633.

Very truly yours,

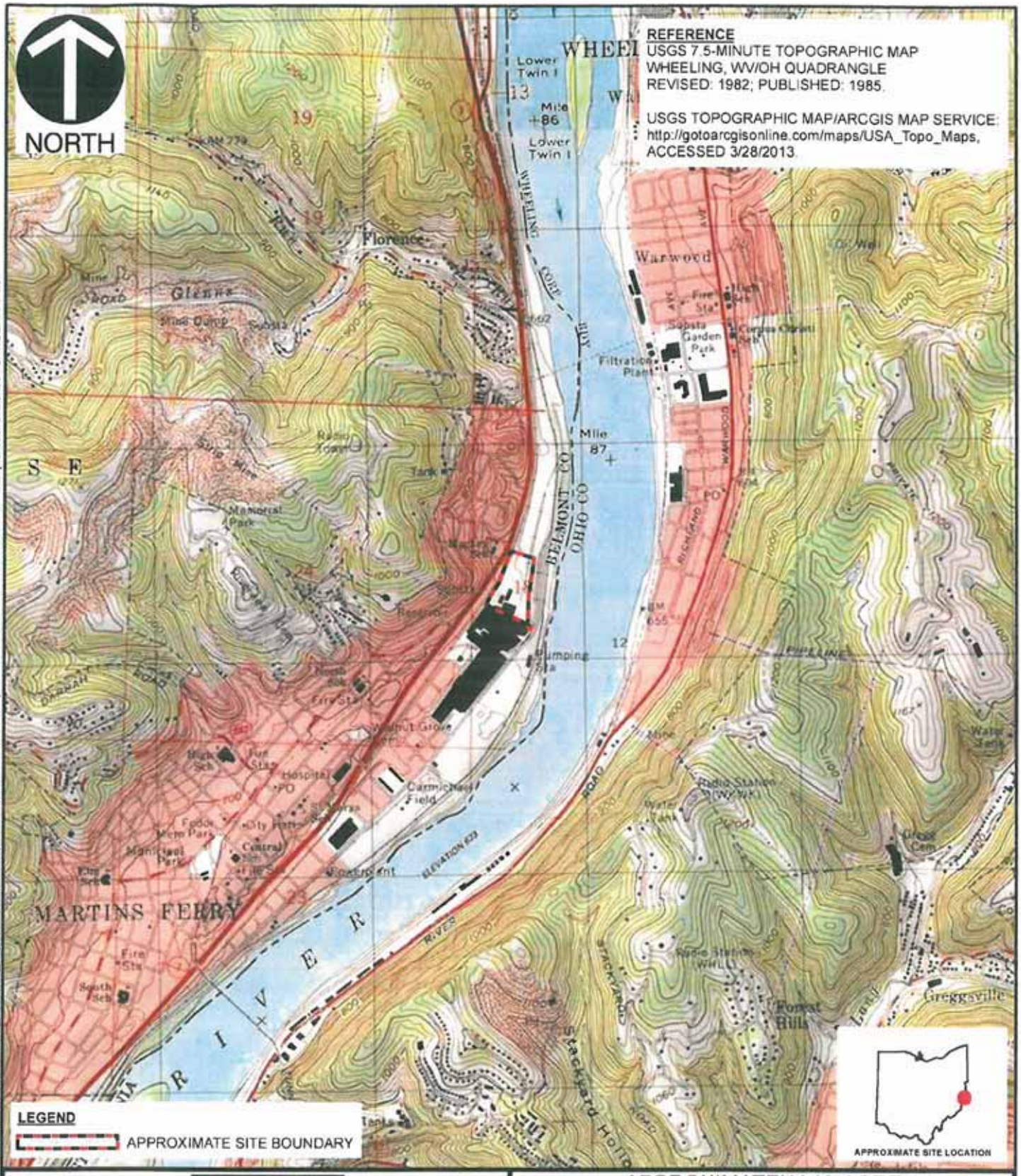
CIVIL & ENVIRONMENTAL CONSULTANTS, INC.

Mary B. Novak
Project Scientist

Andrew G. McCorkle, CPG
Principal

Attachments

FIGURES



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APPROXIMATELY 10-ACRE
FORMER RG STEEL COMPANY SITE
1001 MAIN STREET
MARTIN'S FERRY, BELMONT COUNTY, OHIO

SITE LOCATION MAP

DRAWN BY:	APK/ECP	CHECKED BY:	RJW	APPROVED BY:		FIGURE NO:	1
DATE:	3/28/2013	MAP SCALE:	N.T.S.	PROJECT NO:	122-509.0003		

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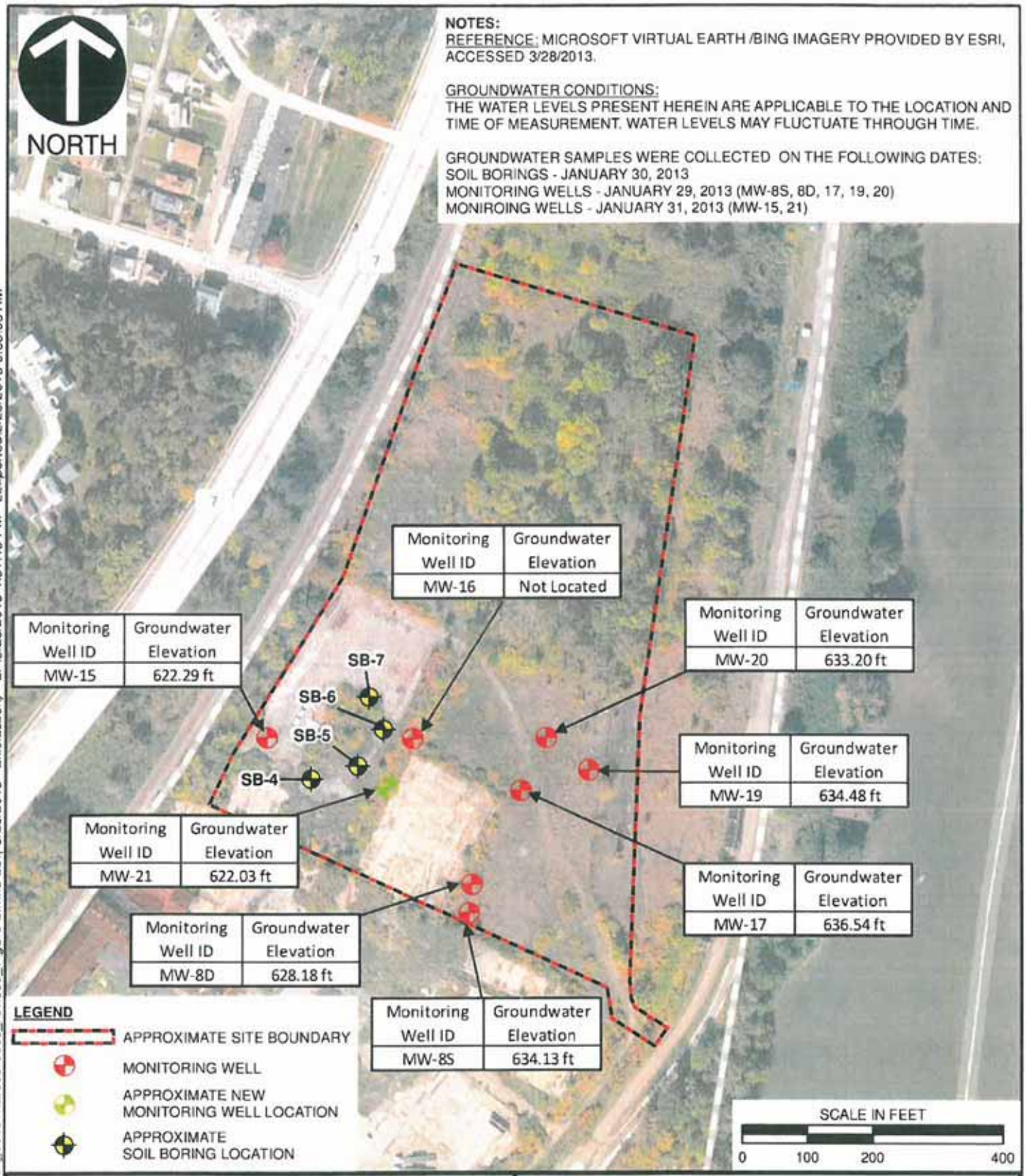

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APPROXIMATELY 10-ACRE
FORMER RG STEEL COMPANY SITE
1001 MAIN STREET
MARTIN'S FERRY, BELMONT COUNTY, OHIO

SITE PLAN AND
GROUNDWATER ELEVATIONS

DRAWN BY:	APK/ECP	CHECKED BY:	RJW	APPROVED BY:		FIGURE NO.:	2
DATE:	3/28/2013	MAP SCALE:	1 " = 200 '	PROJECT NO:	122-509.0003		

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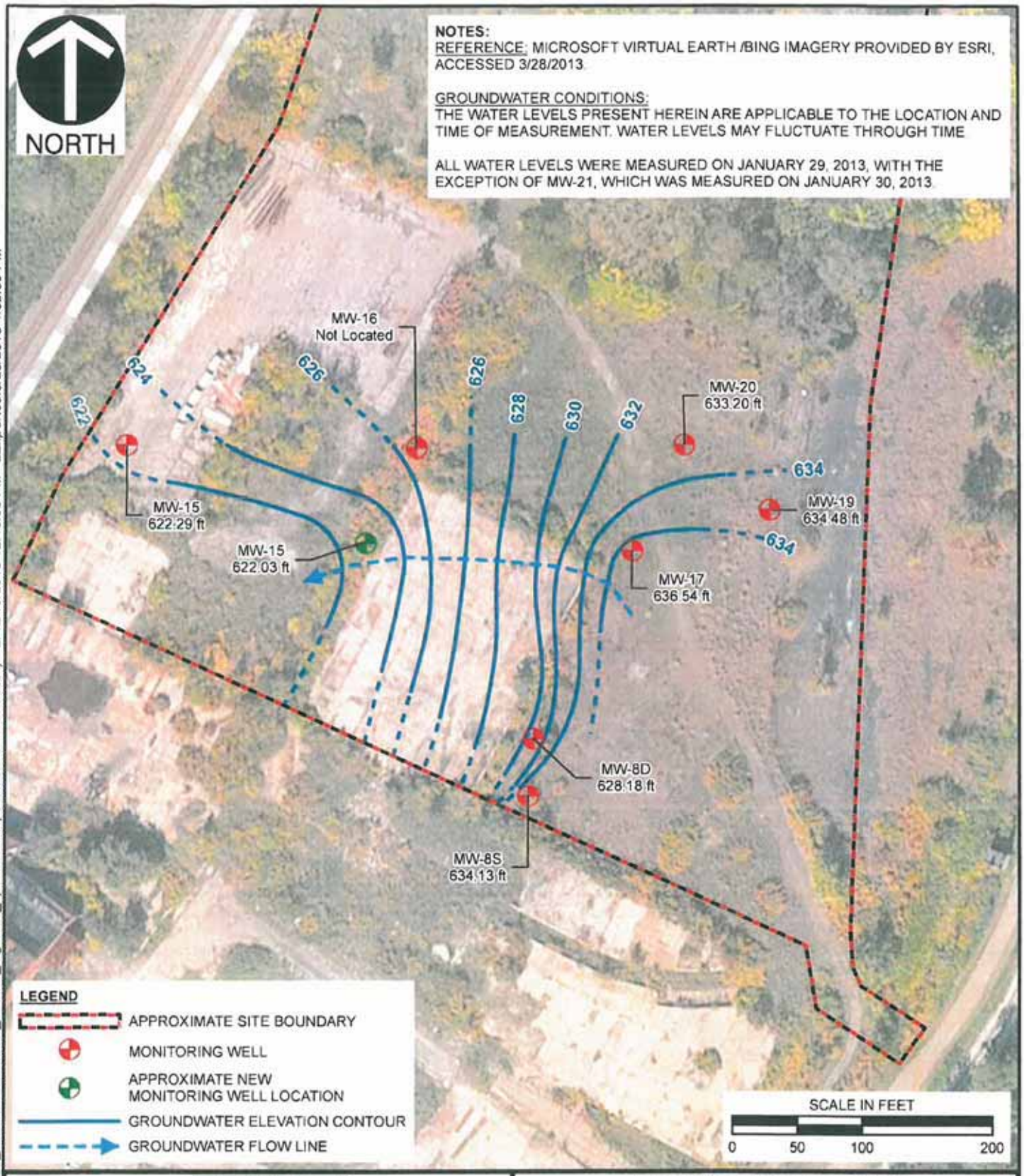

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GROUNDWATER ELEVATION MAP

DRAWN BY:	APK/ECP	CHECKED BY:	RJW	APPROVED BY:		FIGURE NO.:	3
DATE:	3/28/2013	MAP SCALE:	1 " = 100 '	PROJECT NO:	122-509.0003		

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TABLES

Table 1
Ground Water Elevation Summary
Approximately 10-Acre Former RG Steel Property
CEC Project 122-509

Monitoring Well ID	Top of Casing Elevation (ft)	Depth to Water (ft)	Groundwater Elevation (ft)
MW-8S	661.07	26.94	634.13
MW-8D	660.72	32.54	628.18
MW-15	659.57	37.28	622.29
MW-17	658.07	21.53	636.54
MW-19	660.31	25.83	634.48
MW-20	660.95	27.75	633.20
MW-21	662.17	40.14	622.03

Notes:

All measurements referenced to mean sea level.

Static water level measurements were collected on January 29, 2013 (MW-8S, MW-8D, MW-17, MW-19, and MW-20) and January 31, 2013 (MW-15 and MW-21).

Table 2
Summary of Soil Analytical Results
Approximately 10-Acre Former RG Steel Property
CEC Project 122-509

Parameter	Units	Soil Sample ID and Depth										VAP Cleanup Standards
		MW-21A (2')	MW-21B (35')	SB-4A (2')	SB-4B (28')	SB-5A (2')	SB-5B (30')	SB-6A (2')	SB-6B (29')	SB-7A (2')	SB-7B (25')	Direct Contact
Collection Date		1/30/13	1/30/13	1/30/13	1/30/13	1/30/13	1/30/13	1/30/13	1/30/13	1/30/13	1/30/13	Commercial/ Industrial Land Use
Volatile Organic Compounds												
Cabon Disulfide	mg/kg	0.0146	ND	ND	ND	ND	ND	ND	ND	ND	ND	1,400
Polycyclic Aromatic Hydrocarbons												
Acenaphthene	mg/kg	ND	ND	--	--	--	--	--	--	--	--	56,000
Acenaphthylene	mg/kg	ND	ND	--	--	--	--	--	--	--	--	NS
Anthracene	mg/kg	0.126	ND	--	--	--	--	--	--	--	--	280,000
Benzo(a)anthracene	mg/kg	0.279	ND	--	--	--	--	--	--	--	--	76
Benzo(a)pyrene	mg/kg	0.178	ND	--	--	--	--	--	--	--	--	7.7
Benzo(b)fluoranthene	mg/kg	0.23	ND	--	--	--	--	--	--	--	--	77
Benzo(g,h,i)perylene	mg/kg	0.105	ND	--	--	--	--	--	--	--	--	NS
Benzo(k)fluoranthene	mg/kg	0.185	ND	--	--	--	--	--	--	--	--	770
Chrysene	mg/kg	0.371	ND	--	--	--	--	--	--	--	--	7600
Dibenz(a,h)anthracene	mg/kg	ND	ND	--	--	--	--	--	--	--	--	7.7
Fluoranthene	mg/kg	0.422	ND	--	--	--	--	--	--	--	--	37000
Fluorene	mg/kg	ND	ND	--	--	--	--	--	--	--	--	37000
Indeno(1,2,3-cd)pyrene	mg/kg	0.0857	ND	--	--	--	--	--	--	--	--	77
2-Methylnaphthalene	mg/kg	5.44	ND	--	--	--	--	--	--	--	--	NS
Naphthalene	mg/kg	3.75	ND	--	--	--	--	--	--	--	--	150
Phenanthrene	mg/kg	1.68	ND	--	--	--	--	--	--	--	--	NS
Pyrene	mg/kg	0.462	ND	--	--	--	--	--	--	--	--	2800
8 RCRA Metals												
Arsenic	mg/kg	39.5	9.6	11.7	17.1	24.7	5.6	8.5	9.8	8.1	8.8	82
Barium	mg/kg	170	51.7	243	68.9	129	64.2	97.4	81.5	148	119	370,000
Cadmium	mg/kg	9.9	ND	ND	ND	ND	4.8	ND	4.2	ND	ND	2,300
Chromium	mg/kg	48.8	9.0	14.0	9.6	14.8	5.3	9.5	8.1	10.2	8.3	7,900
Lead	mg/kg	868	8.3	61.4	9.7	139	5.7	10.2	9.5	28.4	8.3	1,800
Selenium	mg/kg	ND	ND	ND	ND	2.7	ND	ND	ND	ND	ND	15,000
Silver	mg/kg	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	15,000
Mercury	mg/kg	0.42	ND	ND	ND	ND	ND	ND	ND	5.1	ND	290

Notes:
Values indicated in **BOLD** typeface exceed one or more action levels
NS = No Standard established
-- = Not analyzed for parameter

Table 3
Summary of Groundwater Analytical Results
Approximately 10-Acre Former RG Steel Property
CEC Project 122-509

Parameter	Sample ID							Drinking Water Standards[1]
	MW-8S	MW-8D	MW-15	MW-17	MW-19	MW-20	MW-21	
Collection Date	1/29/2013	1/29/2013	1/31/2013	1/29/2013	1/29/2013	1/29/2013	1/31/2013	
Volatile Organic Compounds (VOCs)								
ND								
Polycyclic Aromatic Hydrocarbons (PAH)								
ND								
Dissolved 8 RCRA Metals								
Aresnic, Dissolved	ND	ND	ND	ND	ND	ND	ND	10[1]
Barium, Dissolved	ND	ND	ND	ND	ND	ND	ND	2000[1]
Cadmium, Dissolved	**13.6**	**36.0**	ND	**21.4**	**89.8**	ND	ND	5[1]
Chromium, Dissolved	ND	ND	ND	ND	ND	ND	ND	100*[1]
Lead, Dissolved	ND	ND	ND	ND	ND	ND	ND	15[1]
Selenium, Dissolved	10.2	ND	ND	ND	ND	ND	ND	50[1]
Silver, Dissolved	ND	ND	ND	ND	ND	ND	ND	79[2]
Mercury, Dissolved	ND	ND	ND	ND	ND	ND	ND	2[1]

Notes:

Values indicated in **BOLD** typeface exceed one or more action levels

[1] = Ohio VAP Generic Unrestricted Potable Use Standard

[2] = Ohio VAP Risk-Derived Generic Unrestricted Potable Use Standard

ND = Not detected above laboratory detection limit

* Standard for Total Chromium