

October 12, 2015

Ms. Donna Musa
Site Hazard Assessments
Toxics Cleanup Program
State of Washington
Department of Ecology
Northwest Regional Office
3190 160th Avenue SE
Bellevue, WA 98008-5452

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Moore&VanAllen

William A. White
Attorney at Law

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F 704 378 2098
billwhite@mvalaw.com

Moore & Van Allen PLLC

Suite 4700
100 North Tryon Street
Charlotte, NC 28202-4003

Re: Site Hazard Assessment Nucor Steel Seattle
Ecology FSIC: 2091/ CS ID: 94

Dear Ms. Musa,

I represent Nucor Steel Seattle, Inc. (owner of the Nucor Seattle steel mill) in connection with Lower Duwamish Waterway Superfund Site matters. I wrote you late in 2014, responding to a Site Hazard Assessment notice, pointing out that the receiving water body for Nucor Steel Seattle, Inc.'s permitted NPDES discharge is Elliot Bay and not the Lower Duwamish Waterway.

A recent study confirming that fact has come to my attention. Attached for the administrative record is a copy of my correspondence to EPA about that Study, along with a copy of the study itself.

Very truly yours,

Moore & Van Allen PLLC



William A. White

cc: Patrick Jablonski

September 16, 2015

Mr. Shawn Blocker
Unit Manager
Site Cleanup Unit 3
Remedial Cleanup Program
U.S. EPA Region 10
1200 6th Avenue, Suite 900
Seattle, WA 98101

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Re: Supplemental Response of Nucor Steel Seattle, Inc. to February 19, 2010 Environmental Protection Agency Information Request, Lower Duwamish Waterway Superfund Site
Respondent: Nucor Steel Seattle, Inc.
Real Property: 2424 SW Andover Street, Seattle, WA 98106
King County Tax Parcels: 2445100110 and 2445100140

Dear Mr. Blocker:

This letter and the attachment, which recently came to my attention, supplement the June 28, 2010 response of Nucor Steel Seattle, Inc. ("Nucor Steel Seattle" or "Respondent") to the Information Request enclosed with Ms. Sheila Eckman's transmittal letter dated February 19, 2010.

In its June, 2010 letter Nucor Steel Seattle noted that its real property or steel mill operations could not physically have been the source of any hazardous substances to which EPA is responding at the Lower Duwamish Waterway Superfund Site. Nucor Steel Seattle noted that during all times Nucor Steel Seattle has owned the steel mill property and operated there, the steel mill property has had no hydrological connection with the site. Rather, discharges from the Nucor Steel Seattle steel mill property flow into Elliott Bay, which is not part of the Lower Duwamish Waterway Superfund Site.

Attached is a copy of a Study performed for the Port of Seattle by Aspect Consulting dated November 3, 2008. As relevant, this study concludes that the "steel mill area" has drained to Elliott Bay since the late 1800s. See pp. 8-11. Current discharges from Nucor Steel Seattle, Inc. are to Elliott Bay through the Longfellow Creek Overflow Line.

The Attached Study also contains additional information about activities at the Steel Mill which are potentially within the scope of Information request 2 ("Site Activities and Interests) and its subparts a. through i., all of which to the steel mill history, operating conditions and materials used at the steel mill.

Mr. Shawn Blocker
September 16, 2015

Based on this complete physical separation from the site, Nucor Steel Seattle continues to deny any liability arising from alleged releases or threatened releases in connection with the Lower Duwamish Waterway Superfund Site. Moreover, Nucor Steel Seattle continues to believe that the above information request, given the circumstances disclosed by the attached report, is not directed at obtaining any information that is or would be relevant to any alleged potential liability at the Lower Duwamish Superfund Site.

Please do not hesitate to call or e-mail should you have questions regarding this supplement.

Very truly yours,

Moore & Van Allen, PLLC

A handwritten signature in black ink, appearing to read 'William A. White', followed by a long horizontal flourish.

William A. White

cc: LDWG via Maren Norton, Esq.