



DEPARTMENT OF THE ARMY

MOBILE DISTRICT, CORPS OF ENGINEERS

P.O. BOX 2288

MOBILE, ALABAMA 36628-0001

July 30, 2013

REPLY TO

ATTENTION OF:

South Mississippi Branch
Regulatory Division

SUBJECT: Department of the Army Permit Number SAM-2007-635-DMY,
ThyssenKrupp Steel, USA, Modification Number: 04.

ThyssenKrupp Steel, USA
Attention: Mr. Larry Wahl
C/o: Mr. Dustin Taylor
Post Office Box 456
Calvert, Alabama 36513

Dear Mr. Wahl:

Reference is made to your letter dated January 30, 2013 for a modification to the original permit authorization dated October 12, 2007. Outlined in the enclosed Modification 02 dated April 25, 2008, both parties agreed as co-permittee's for the overall project, however in your most recent letter, you requested a split of the originally authorized permit, SAM-2007-635-DMY between ThyssenKrupp Steel, USA and Outokumpu (formerly ThyssenKrupp Stainless, USA). Your project will continue to be identified as SAM-2007-635-DMY or the ThyssenKrupp Steel, USA project. Please refer to this in all future correspondence with this office. The project site is located just off U.S. Highway 43 north approximately 18 miles off of Interstate 65 and 32 miles from the Port of Mobile. Site includes multiple streams and tributaries adjacent to the Tombigbee River (River Mile 49), Mount Vernon, Mobile and Washington County, Alabama. Section 55 and 56, Township 3 North, Range 1 East. Coordinates as follows: Latitude N 31 08' 30" and Longitude W 87 59' 11".

In accordance with your request and following coordination with interested parties your permit is hereby modified to include ThyssenKrupp Steel, USA and Outokumpu Stainless, USA. Additionally your permit now includes the enclosed updated site layout drawing date stamped July 30, 2013. Your revised modification includes the following scope of activities outlined in your request identified above:

The portion of the project on ThyssenKrupp Steel USA property includes the following work (derived from the scope of work approved by the Alabama Department of Environmental Management in a letter dated August 28, 2007):

Wetland Fill (Applies to both ThyssenKrupp Steel, USA and Outokumpu):

The majority of the Mount Vernon site is primarily upland (non-wetland) with approximately 321.6 acres of jurisdictional wetlands and approximately 22.7 acres of isolated non- jurisdictional wetlands. Impacts will be associated with approximately 51.7 acres of jurisdictional wetlands and 18.9 acres of isolated non-jurisdictional wetlands. Most of the upland habitat on site has been intensively managed for the production of loblolly pine. The wetland communities that occur are classified into the following categories: bottomland hardwood forest, headwater forest , swamp forest, gum depression, wet flat (pine) , pine savannah, beaver pond, and borrow pond and range from medium to high quality.

Stream Impacts (Applies to Outokumpu only):

Impacts are planned for approximately 1,169 linear feet of jurisdictional stream of which approximately 317 linear feet is perennial and 852 linear feet is intermittent.

Dredging (applies to ThyssenKrupp Steel USA only):

ThyssenKrupp Steel and Outokumpu require the transporting of bulk raw materials and finished steel products into and out of the facility. Approximately 400,000 cubic yards of material has been evacuated by mechanical dredge to include both upland and water bottom for support of a waterfront barge loading and unloading terminal and to support vessel traffic required by the facility along the Tombigbee River. The barge terminal will be evacuated into the riverbank and arranged to keep moored barges out of the shipping channel.

Dredge Disposal Area (applies to ThyssenKrupp Steel USA only):

Material excavated was placed in an upland location and used primarily during construction activities.

Mitigation (applies to both ThyssenKrupp Steel USA and Outokumpu):

Wetland compensation for unavoidable wetland impacts as a result of the project was done through the preservation of approximately 162 acres of on-site jurisdictional wetlands and Enhancement of a 100-foot upland buffer adjacent to the wetlands totaling approximately 120 acres. For those on-site unavoidable stream impacts, proposed compensation is through riparian buffer enhancement along a disturbed reach of Dabney Creek. In addition, ThyssenKrupp Steel has made efforts to preserve an extra portion of Dabney Creek by deed restriction.

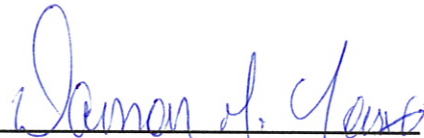
All other previous conditions to which the work is made subject shall remain in full force and effect, including the expiration date of October 12, 2027.

If the scope of work or project location changes, you are urged to contact this office for a verification of this determination. Please contact me at (251) 694-3781, if you have any questions. For additional information about our Regulatory

Program, please visit our web site at www.sam.usace.army.mil/RD/reg, and please take a moment to complete our customer satisfaction survey while you're there. Your responses are appreciated and will allow us to improve our services.

Copies of this letter will be sent via email to the Alabama Department of Environmental Management, US Fish and Wildlife Service, the Alabama Department of Conservation and Natural Resources and Mr. Steven D. Stewart of AMEC.

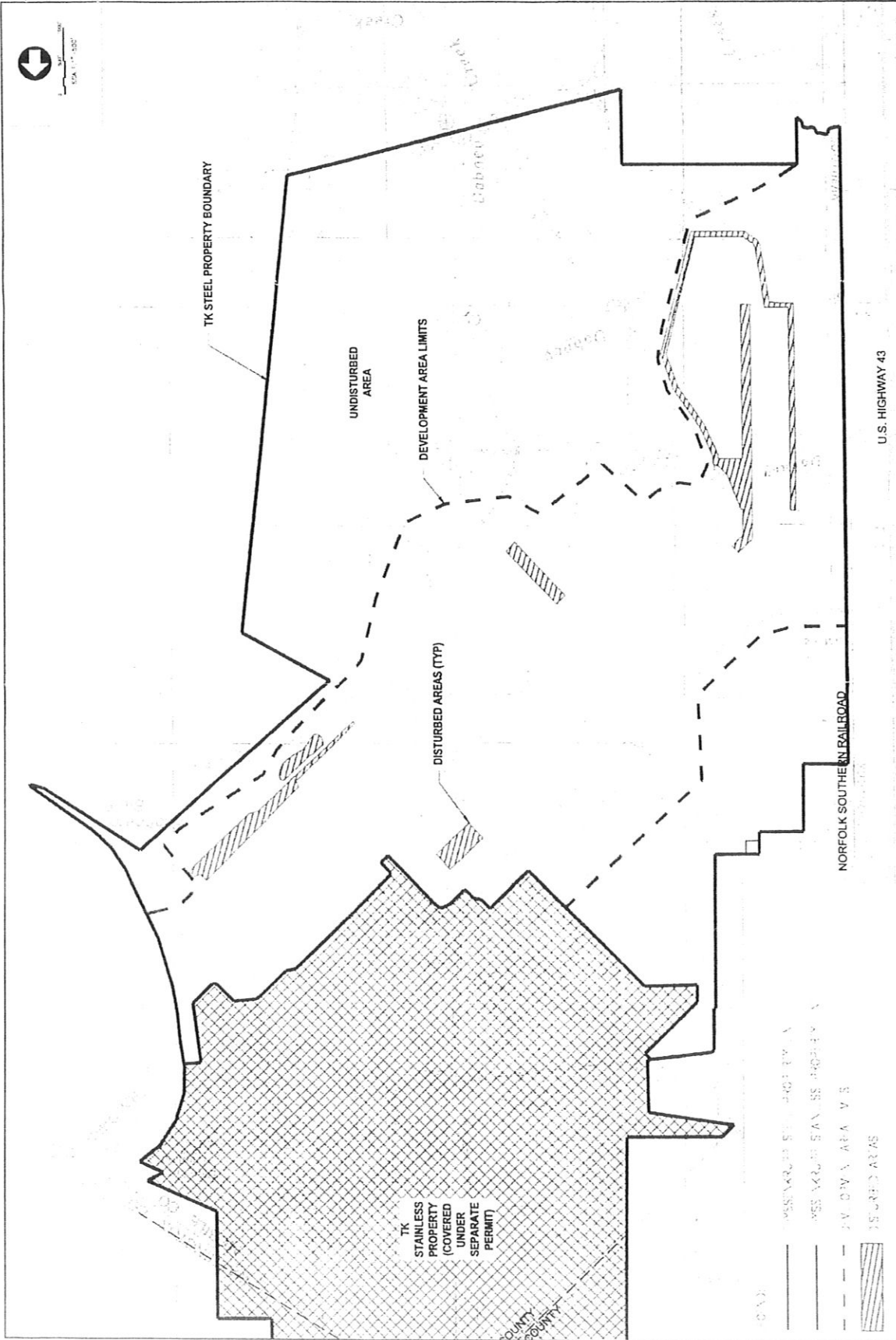
BY AUTHORITY OF THE SECRETARY OF THE ARMY:

PREPARED BY: 
DAMON M. YOUNG, P.G.
Team Leader, South Mississippi Branch
Regulatory Division

STEVEN J. ROEMHILDT, P.E.
Colonel, Corps of Engineers
District Commander

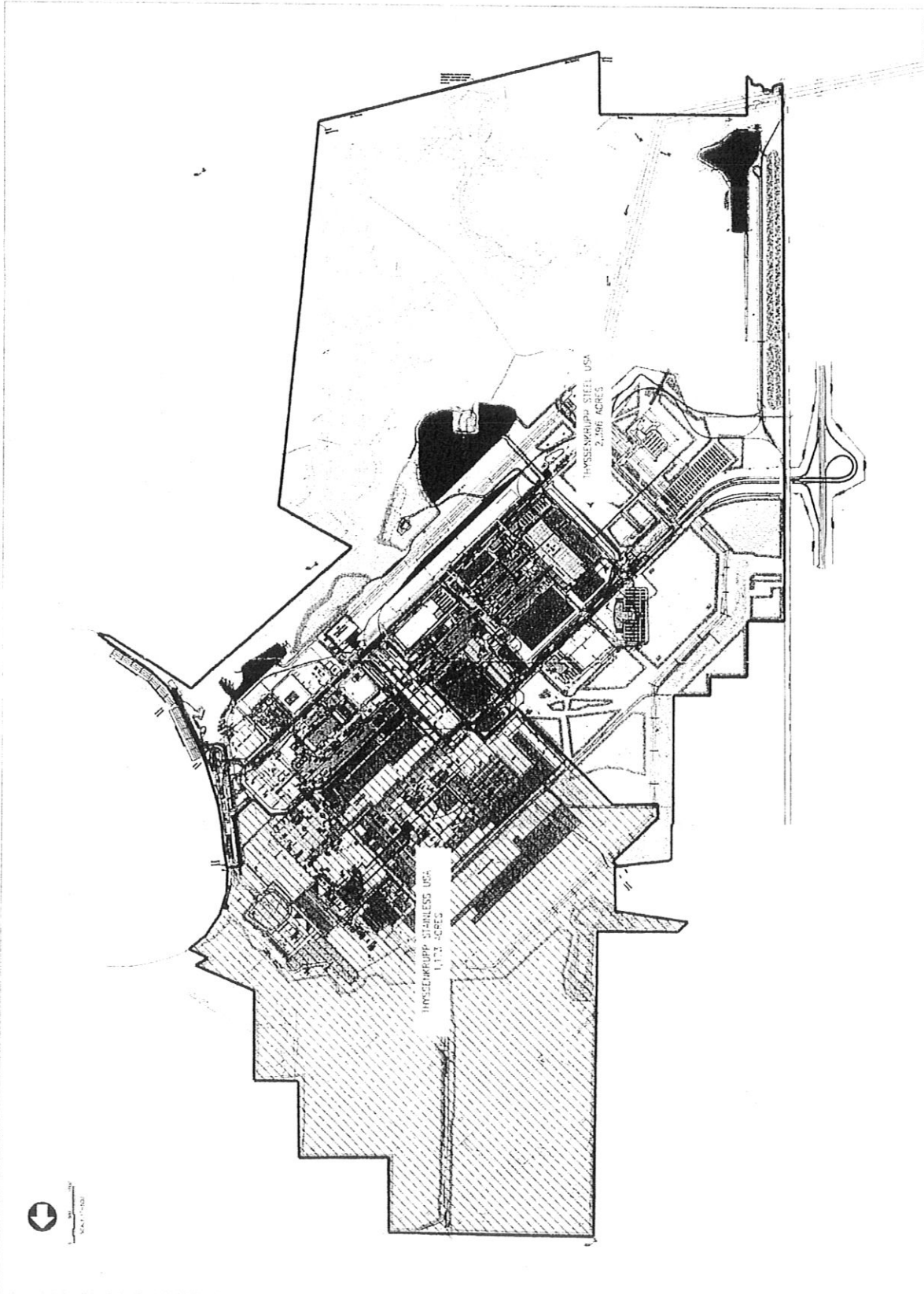
BY: _____
MUNTHUR N. SAHAWNEH
Chief, South Mississippi Branch
Regulatory Division

Enclosures



TK STAINLESS PROPERTY (COVERED UNDER SEPARATE PERMIT)	1" = 100' N	DISTURBED AREAS (TYP) DEVELOPMENT AREA LIMITS TK STEEL PROPERTY BOUNDARY	U.S. HIGHWAY 43 NORFOLK SOUTHERN RAILROAD	ITHYSENKRUPP STAINLESS USA, LLC. amec AMEC ENVIRONMENTAL & INFRASTRUCTURE, INC. 1001 ... 1001 ...	FIGURE 1 SITE-WIDE CONSTRUCTION BEST MANAGEMENT PRACTICES SITE PLAN	DATE: 7-19-10 DRAWN BY: ... CHECKED BY: ...	SCALE: AS SHOWN
	DISTURBED AREAS (TYP)						
	DEVELOPMENT AREA LIMITS						
	TK STEEL PROPERTY BOUNDARY						

JUL 30 2013



NO.	DATE	DESCRIPTION	BY	CHECKED
1	07/30/2013	ISSUED FOR CONSTRUCTION	AMEC	
2	07/30/2013	REVISED	AMEC	
3	07/30/2013	REVISED	AMEC	
4	07/30/2013	REVISED	AMEC	
5	07/30/2013	REVISED	AMEC	
6	07/30/2013	REVISED	AMEC	
7	07/30/2013	REVISED	AMEC	
8	07/30/2013	REVISED	AMEC	
9	07/30/2013	REVISED	AMEC	
10	07/30/2013	REVISED	AMEC	

AMEC CONSULTANTS & ENGINEERS, INC.
1000 W. 15th Street, Suite 1000
Cincinnati, OH 45202
TEL: (513) 566-7000
FAX: (513) 566-7001
WWW.AMEC.COM

CONSULTANT: M.A. MASSMAN
PROJECT: UMS

JUL 30 2013



DEPARTMENT OF THE ARMY
MOBILE DISTRICT, CORPS OF ENGINEERS
P.O. BOX 2288
MOBILE, ALABAMA 36628-0001

April 25, 2008

REPLY TO
ATTENTION OF:

Inland Branch
Regulatory Division

SUBJECT: Department of the Army Permit Number SAM-2007-635-DMY
Modification Number: 02

ThyssenKrupp Steel, USA
Attention: Mr. Thomas Woelker
1087 Downtowner Boulevard, Suite 200
Mobile, Alabama 36609

Dear Mr. Woelker:

Reference is made to your letter dated March 26, 2008 for a modification to the existing permit authorization dated October 12, 2007 and modified on March 17, 2008. In your request you outlined to co-permittee's ThyssenKrupp Steel, USA and ThyssenKrupp Stainless, USA to be added as signatures on the permit authorization. Additionally in an e-mail request dated April 23, 2008 you identified an un-foreseen change in scope due to right of way (ROW) related issues. In this request you outlined that former ROW impacts to jurisdictional wetlands numbers 6, 18, and 21 totaling 2.33 acres was needed to support a power utility line. As a result of this ROW, stone road access and overhead construction of this power utility line is needed. This would new ROW would impact approximately 0.1 acres of wetland number 22 which was previously identified as jurisdictional but not identified as an impact. As a result of this change you have shown that it would be a reduction in jurisdictional wetland impacts with a new ROW totaling 2.1 acres in the immediate vicinity of Barrows Creek. This is an overall reduction of impacts by 0.23 acres. At this time you are in the process of finalizing compensation for the original 52 acres of impact.

In accordance with your request and following coordination with interested parties your permit is hereby modified to include the additional signatures for co-permittee's ThyssenKrupp Steel, USA and ThyssenKrupp Stainless, USA. Please have all parties sign the enclosed signature authorization sheets and return both copies to this office for a final signature. Additionally your permit now includes the updated site layout drawing dated December 11, 2007 and the drawing outlining the Revised Alabama Power Alignment at Barrows Creek.

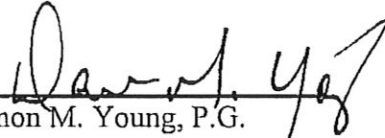
All other previous conditions to which the work is made subject shall remain in full force and effect, including the expiration date of October 12, 2027.

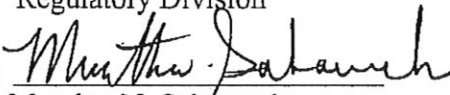
If the scope of work or project location changes, you are urged to contact this office for

a verification of this determination. Please contact me at (251) 694-3781, if you have any questions. For additional information about our Regulatory Program, please visit our web site at www.sam.usace.army.mil/RD/reg, and please take a moment to complete our customer satisfaction survey while you're there. Your responses are appreciated and will allow us to improve our services.

Copies of this letter will be sent to the Alabama Department of Environmental Management, US Fish and Wildlife Service, the Alabama Department of Conservation and Natural Resources and Mr. Phil Pauquette of MACTEC.

BY AUTHORITY OF THE SECRETARY OF THE ARMY:

PREPARED BY: 
Damon M. Young, P.G.
Project Manager, Inland Branch
Regulatory Division

BY: 
Munther N. Sahawneh
Team Leader, Inland Branch
Regulatory Division

BYRON G. JORNS
Colonel, Corps of Engineers
District Commander

Enclosures

Copy Furnished:

E-Mail Only:

Ms. Jennifer Robinson, ADEM
Mr. Patric Harper, FWS
Mr. James Cherry, ADCNR
Mr. Phil Pauquette, MACTEC

DEPARTMENT OF THE ARMY PERMIT

Permittee: **THYSSENKRUPP STEEL AND STAINLESS, USA**

Permit No.: **SAM-2007-635-DMY**

Issuing Office: **MOBILE DISTRICT**

NOTE: The term "you" and its derivatives, as used in this permit, means the permittee or any future transferee. The term "this office" refers to the appropriate district or division office of the Corps of Engineers having jurisdiction over the permitted activity or the appropriate official of that office acting under the authority of the commanding officer.

You are authorized to perform work in accordance with the terms and conditions specified below.

Project Description: The permittee is authorized to fill 52 acres of jurisdictional wetlands and 1,169 linear feet of stream in conjunction with the construction of a steel and stainless processing facility in the vicinity of Calvert / Mount Vernon, Alabama. The processing facility will include the construction of a barge terminal (wharf facility). The barge terminal will be 1,540 feet long with future expansion capability to 1,760 feet. The working surface will be a ground supported concrete slab. The crane runways will be pile-supported. Approximately 400,000 cubic yards of material will be excavated via hydraulic dredge to facilitate barge loading and unloading terminal and to support the vessel traffic required by the facility along the Tombigbee River. The barge terminal will be excavated into the riverbank and arranged to keep moored barges out of the shipping channel. Steel sheet pile bulkhead and riprap will be used to protect the barge terminal. The excavated materials will be placed in an upland location and used primarily during construction activities.

- Attached:**
1. Vicinity Map and Supplemental "Approved Drawings" (56 pages)
 2. 401 Water Quality Certification (6 pages)
 3. Mitigation Plan and "Approved Revisions" (23 pages)
 4. Memorandum of Agreement for Section 106 of the NHPA and Supplemental "Approved Plans" (30 pages)
 5. Aquatic Species, Dredging Permit Conditions (5 pages)

Project Location: The project is for the construction of a steel and stainless processing facility located just off U.S. Highway 43 north approximately 18 miles off of Interstate 65 and 32 miles from the Port of Mobile. Site includes multiple streams and tributaries adjacent to the Tombigbee River (River Mile 49), Mount Vernon, Mobile and Washington County, Alabama. Section 55 and 56, Township 3 North, Range 1 East. Coordinates as follows: Latitude N 31 08' 30" and Longitude W 87 59' 11".

Permit Conditions:

General Conditions:

1. The time limit for completing the work authorized ends on **October 12, 2027**. If you find that you need more time to complete the authorized activity, submit you request for a time extension to this office for consideration at least 1 month before the above date is reached.
2. You must maintain the activity authorized by this permit in good condition and in conformance with the terms and conditions of this permit. You are not relieved of this requirement if you abandon the permitted activity, although you may make a good faith transfer to a third party in compliance with General Condition 4 below. Should you wish to cease to maintain the authorized activity or should you desire to abandon it without a good faith transfer, you must obtain a

modification of this permit from this office, which may require restoration of the area.

3. If you discover any previously unknown historic or archeological remains while accomplishing the activity authorized by this permit, you must immediately notify this office of what you have found. We will initiate the Federal and State coordination required to determine if the remains warrant a recovery effort or if the site is eligible for listing in the National Register of Historic Places.
4. If you sell the property associated with this permit, you must obtain the signature of the new owner in the space provided and forward a copy of the permit to this office to validate the transfer of this authorization.
5. If a conditioned water quality certification has been issued for your project, you must comply with the conditions specified in the certification as special condition to this permit. For your convenience, a copy of the certification is attached if it contains such conditions.
6. You must allow representatives from this office to inspect the authorized activity at any time deemed necessary to ensure that it is being or has been accomplished in accordance with the terms and conditions of your permit.

Special Conditions:

a. The permittee shall comply with all requirements of the Alabama Department of Environmental Management's 401 water quality certification dated August 28, 2007 in addition to a letter of clarification dated September 14, 2007.

b. The permittee shall implement the wetland mitigation plan dated April 10, 2007, revised June 13, 2007 and revised July 23, 2007 for un-avoidable impacts to approximately 52 acres of jurisdictional wetlands via onsite preservation of 162 acres of wetlands with a 100-foot buffer and through the purchase of sufficient credits for impacts to 31 acres of medium quality wetlands at a local wetland mitigation bank. The number of credits purchased shall be in accordance with the bank's approved banking instrument. Proof of credit purchase shall be provided within 60 days of permit issuance. The permittee shall conduct approximately 1,300 linear feet of floodplain restoration and streambank stabilization and approximately 1,300 linear feet of buffer preservation on Stream Number 4 for a total of 5,135 stream credits. On-site mitigation shall commence within 120 days of the permit issuance.

c. The stream mitigation site will be monitored for 5 years. A base line monitoring report of the mitigation sites shall commence concurrent with permit issuance and be completed within twelve months of permit issuance. Copies of the annual monitoring report including appropriate photo-documentation and a comparison with the base line data shall be furnished annually to the U.S. Army Corps of Engineers.

d. The permittee shall use the Mobile District's Restrictive Covenant (RC) and any changes to the RC will have to be reviewed by the Mobile District prior to its implementation. After approval, it will be properly recorded at the county courthouse. A fully executed copy shall be provided to the U.S. Army Corps of Engineers within 120 days of permit issuance.

e. If any evidence of the presence of Endangered/Threatened species is found during construction, ground disturbing activities in the immediate vicinity must cease, and the permittee

shall notify the USACE and FWS immediately. Additionally, the permittee shall implement the construction conditions outlined in a letter dated August 30, 2007 and identified as "Aquatic Species Dredging Permit Conditions" during dredging operations. For future major construction events, the permittee shall coordinate with this office.

f. The applicant, the SHPO and the USACE shall adhere to a Memorandum of Agreement dated September 18, 2007. Additionally, should artifacts or archaeological features be encountered during project activities, all heavy equipment operations within a 30 meter (98.43 feet) buffer surrounding the potentially significant artifact(s) or the observation will cease and the Alabama State Historic Preservation Officer, and Mobile District shall be consulted immediately.

g. Best management practices shall be implemented to minimize erosion, siltation and damage to adjacent wetlands and waters of the United States. Appropriate erosion and siltation control measures must be used and maintained in effective operating condition during construction. All temporary erosion control features shall remain in place until permanent stabilization measures have been completed and have become fully effective.

h. Only suitable material free of waste, metal and organic trash, unsightly debris, etc., may be used as fill and material discharged must be free from toxic pollutants in toxic amounts.

i. The disposal of trees, brush and other debris in any stream corridor, wetland or surface water is prohibited.

j. All excavation and fill activities shall be performed in a manner that minimizes disturbance and turbidity increases in "waters of the United States" and wetlands; and shall be retained in a manner to preclude its erosion into any adjacent wetlands or waterway.

k. The movement of equipment within wetlands shall be limited to the minimum necessary to accomplish the work authorized herein. All equipment required to traverse wetland areas shall be supported on mats.

l. Project construction shall be conducted in such a manner that the passage of normal and expected high flows of surface water runoff outside the project boundaries is not restricted or otherwise altered.

m. Construction activities shall not infringe upon navigation on the waterway. Construction and daily operational activities shall be in compliance with Federal Waterway Regulations.

n. The permittee will provide this District and the U.S. Coast Guard a work schedule, at least 10 days in advance, for work impacting the ship channel, so that a "Notice to Mariners" can be issued.

o. Prior to the dredging operations surrounding the development of the wharf facility, the permittee shall coordinate with the Alabama Department of Conservation and Natural Resources – State Lands Division (SLD); Submerged Lands Permits for clearance of removal of state water-bottoms.

p. Currently a pre-hydrographic survey has been conducted. However, the permittee shall

conduct a post-construction hydrographic survey will be performed of the work area extended over the full width of the adjacent Federal navigation channel and extended upstream and downstream at least 150 feet of either work limit. Such a survey should be tied to mean low water datum, taken from a common base line control (which is tied to a survey monument) and indicate the water bottom and bank elevations every 25 feet in 2 principle directions. The survey results should be processed to a plan view map (a separate map for each survey) and submitted to this office.

q. Activities surrounding maintenance dredging events, the permittee shall coordinate in a timely manner with this office, the FWS, the ADEM, and the ADCNR SLD.

r. The permittee understands and agrees that, if future operations by the United States require the removal, relocation or other alteration, of the structure or work herein authorized, or if, in the opinion of the Secretary of the Army or his authorized representative, said structure or work shall cause unreasonable obstruction to the free navigation of the navigable waters, the permittee will be required, upon due notice from the U. S. Army Corps of Engineers (Corps), to remove, relocate or alter the structural work or obstructions caused thereby, without expense to the United States. No claim shall be made against the United States on account of any such removal or alteration.

Further Information:

1. Congressional Authorities: You have been authorized to undertake the activity described above pursuant to Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. 403) and Section 404 of the Clean Water Act (33 U.S.C. 1344).

2. Limits of this authorization.

a. This permit does not obviate the need to obtain other Federal, State or local authorizations required by law.

b. This permit does not grant any property rights or exclusive privileges.

c. This permit does not authorize any injury to the property or rights of others.

d. This permit does not authorize interference with any existing or proposed Federal project.

3. Limits of Federal Liability. In issuing this permit, the Federal Government does not assume any liability for the following:

a. Damages to the permitted project or uses thereof as a result of other permitted or unpermitted activities or from natural causes.

b. Damages to the permitted project or uses thereof as a result of current or future activities undertaken by or on behalf of the United States in the public interest.

c. Damages to persons, property, or to other permitted or unpermitted activities or structures caused by the activity authorized by this permit.

- d. Design or construction deficiencies associated with the permitted work.
- e. Damage claims associated with any future modification, suspension, or revocation of this permit.

4. Reliance on Applicant's Data: The determination of this office that issuance of this permit is not contrary to the public interest was made in reliance on the information you provided.

5. Reevaluation of Permit Decision. This office may reevaluate its decision on this permit at any time the circumstances warrant. Circumstances that could require a reevaluation include, but are not limited to, the following:

- a. You fail to comply with the terms and conditions of this permit.
- b. The information provided by you in support of your permit application proves to have been false, incomplete, or inaccurate (See 4 above).
- c. Significant new information surfaces which this office did not consider in reaching the original public interest decision.

Such a reevaluation may result in a determination that it is appropriate to use the suspension, modification, and revocation procedures contained in 33 CFR 325.7 or enforcement procedures such as those contained in 33 CFR 326.4 and 326.5. The referenced enforcement procedures provide for the issuance of an administrative order requiring you to comply with the terms and conditions of your permit and for the initiation of legal action where appropriate. You will be required to pay for any corrective measures ordered by this office, and if you fail to comply with such directive, this office may in certain situations (such as those specified in 33 CFR 209.170) accomplish the corrective measures by contract or otherwise and bill you for the cost.

6. Extensions. General condition 1 establishes a time limit for the completion of the activity authorized by this permit. Unless there are circumstances requiring either a prompt completion of the authorized activity or a reevaluation of the public interest decision, the Corps will normally give favorable consideration to a request for an extension of this time limit.

Your signature below, as permittee, indicates that you accept and agree to comply with the terms and conditions of this permit.

Jim Wines VICE PRESIDENT
 (PERMITTEE) ThyssenKrupp Steel and Stainless USA
 Attention: Mr. Thomas Woelker
 1087 Downtowner Boulevard, Suite 200
 Mobile, AL 36609
 USA

04-18-2008
 (DATE)

Jim Wines VICE PRESIDENT
 (CO-PERMITTEE) ThyssenKrupp Steel USA
 Attention: Mr. Thomas Woelker
 1087 Downtowner Boulevard, Suite 200
 Mobile, AL 36609
 USA

04-18-2008
 (DATE)

Uli Albrecht-Frueh

(CO-PERMITTEE) ThyssenKrupp Stainless USA
Attention: Dr. Uli Albrecht-Frueh
1087 Downtowner Boulevard, Suite 200
Mobile, AL 36609
USA

MAY - 2 - 08
(DATE)

This permit becomes effective when the Federal official, designated to act for the Secretary of the Army, has signed below.

BYRON G. JORNS
COLONEL, CORPS OF ENGINEERS
(DISTRICT ENGINEER)

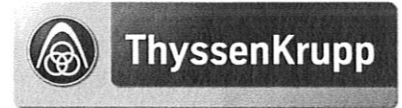
BY: *William R Bunkley* 5/23/08
WILLIAM R. BUNKLEY (DATE)
CHIEF, INLAND BRANCH
REGULATORY DIVISION

When the structures or work authorized by this permit are still in existence at the time the property is transferred, the terms and conditions of this permit will continue to be binding on the new owner(s) of the property. To validate the transfer of this permit and the associated liabilities associated with compliance with its terms and conditions, have the transferee sign and date below.

(TRANSFEE)

(DATE)

ThyssenKrupp Steel USA



January 30, 2013

US Army Corps of Engineers—Mobile District
Mr. Damon Young
109 Saint Joseph Street
Mobile, AL 36628

Certified Mail Number 7007 1490 0004 6370 0682

Dear Mr. Young,

We would like to request a split of the permit SAM-2007-635-DMY between ThyssenKrupp Steel USA and Outokumpu (formerly ThyssenKrupp Stainless, USA). Enclosed are a scope of the split and map of the property boundaries. The responsible official for the permit will be Larry Wahl, Director EHS. Please contact Dustin Taylor at (251) 623-5821 if you have any questions or concerns.

Yours sincerely,
ThyssenKrupp Steel USA, LLC

A handwritten signature in cursive script that reads 'Larry Wahl'.

Larry Wahl
Director Environmental, Health and Safety

Enclosures

Proposed scope of ThyssenKrupp Steel revised permit wetlands

ThyssenKrupp Steel USA, LLC and Outokumpu (Formerly ThyssenKrupp Stainless, USA) Stainless are proposing a split of their shared Army Corps of Engineers permit: SAM-2007-635-DMY. Attached are two maps, which lay out the property boundaries that will be adhered to in the new permits. The jurisdictional wetland and associated buffer zones for areas 15, 17, 26, and 31 will remain the property and responsibility of ThyssenKrupp Steel (outlined in red on the maps) and stream 4 will belong to Outokumpu (outlined in blue on the maps). The monitoring plan will continue with Volkert for the remainder of the 5 year contract. Any remediation required as a result of the monitoring reports will be the responsibility of each company to address.

The Responsible Official for the ThyssenKrupp Steel USA wetlands Army Corps of Engineers permit will be:

Larry Wahl, Director EHS
1 ThyssenKrupp Drive
Calvert, AL 36513
(O) (251) 289-3144
(C) (251) 508-1258
(F) (251) 289-5690

The portion of the project on ThyssenKrupp Steel USA property includes the following work (derived from the scope of work approved by ADEM in a letter dated August 28, 2007):

- 1) Wetland Fill (Applies to both ThyssenKrupp Steel USA and Outokumpu):
The majority of the Mount Vernon site is primarily upland (non-wetland) with approximately 321.6 acres of jurisdictional wetlands and approximately 22.7 acres of isolated non-jurisdictional wetlands. Impacts will be associated with approximately 51.7 acres of jurisdictional wetlands and 18.9 acres of isolated non-jurisdictional wetlands. Most of the upland habitat on site has been intensively managed for the production of loblolly pine. The wetland communities that occur are classified into the following categories: bottomland hardwood forest, headwater forest, swamp forest, gum depression, wet flat (pine), pine savannah, beaver pond, and borrow pond and range from medium to high quality.
- 2) Stream Impacts (Applies to Outokumpu only):
Impacts are planned for approximately 1,169 linear feet of jurisdictional stream of which approximately 317 linear feet is perennial and 852 linear feet is intermittent.
- 3) Dredging (applies to ThyssenKrupp Steel USA only):
ThyssenKrupp Steel and Outokumpu require the transporting of bulk raw materials and finished steel products into and out of the facility. Approximately 400,000 cubic yards of material has been evacuated by hydraulic dredge to include both upland and water bottom for support of a waterfront barge loading and unloading terminal and to support vessel traffic

required by the facility along the Tombigbee River. The barge terminal will be evacuated into the riverbank and arranged to keep moored barges out of the shipping channel.

- 4) Dredge Disposal Area (applies to ThyssenKrupp Steel USA only):
Material excavated was placed in an upland location and used primarily during construction activities.

- 5) Mitigation (applies to both ThyssenKrupp Steel USA and Outokumpu):
 - 1) Wetland compensation for unavoidable wetland impacts as a result of the project was done through the preservation of approximately 162 acres of on-site jurisdictional wetlands and
 - 2) Enhancement of a 100-foot upland buffer adjacent to the wetlands totaling approximately 120 acres.
 - 3) For those on-site unavoidable stream impacts, proposed compensation is through riparian buffer enhancement along a disturbed reach of Dabney Creek. In addition, ThyssenKrupp Steel has made efforts to preserve an extra portion of Dabney Creek by deed restriction.