



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

December 4, 2015

BDM Warren Steel Holdings, LLC
999 Pine Ave SE
Warren, OH 44483

Re: **BDM Warren Steel Holdings, LLC
Director's Authorization
Approval
Beneficial Use
Trumbull County
BENU021235**

Re: **BDM Warren Steel Holdings, LLC
Non-permit Related Exemptions
Approval
Beneficial Use
Trumbull County
BENU021235**

Subject: Final Findings and Orders

Dear Sir or Madam:

Transmitted herewith are the Final Findings and Orders of the Director concerning the matter indicated for BDM Warren Steel Holdings, LLC.

You are hereby notified that this action of the Director of Ohio EPA (Director) is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 made payable to "Treasurer, State of Ohio." The Commission, in its discretion, may reduce the fee if by affidavit it is demonstrated that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High St., 17th Floor
Columbus, Ohio 43215

If you have any questions, please contact Janine Maney at (614) 644-3037.

Sincerely,

Gregory Nichols, Administrative Professional 3
Division of Materials & Waste Management

Enclosure

cc: Jarnal Singh, NEDO
Sue Netzly-Watkins, NEDO

OHIO E.P.A.

DEC -4 2015

ENTERED DIRECTOR'S JOURNAL

Issuance Date: DEC 04 2015

Effective Date: DEC 04 2015

**BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY**

In the Matter of:

BDM Warren Steel Holdings, LLC
999 Pine Ave. SE
Warren, Ohio 44483

Director's Final
Findings and Orders

I. JURISDICTION

These Director's Final Findings and Orders ("Orders") are hereby issued to BDM Warren Steel Holdings, LLC ("BDM"), pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency ("Ohio EPA") under Ohio Revised Code ("ORC") Section 3734.02, Ohio Administrative Code ("OAC") Rule 3745-27-03(B), and OAC Rule 3745-27-05(A)(4).

II. PARTIES

These Orders shall apply to and be binding upon BDM and successors in interest liable under Ohio law. No changes in ownership relating to the BDM Steel Facility, as hereinafter defined, shall in any way alter BDM's obligations under these Orders.

III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same meaning as defined in ORC Chapter 3734. and the rules promulgated thereunder.

IV. FINDINGS

The Director of Ohio EPA ("Director") has determined the following findings:

1. BDM is the owner of the Pond #5 area, situated on a part of Parcel Number 43-313400, and of the Pond #56 (also known as the 56" Hot Mill Lagoon) area, situated on a part of Parcel Number 28-694800. These parcels are located on a portion of a 268 acre tract of land identified by the Trumbull County Recorder as instrument number 201210240026388, located at Main and Pine Avenue SE, Warren, Trumbull County, Ohio.

2. BDM has entered into the Ohio Voluntary Action Program (VAP) Memorandum of Agreement (MOA) track (Project No. 278-000671-004) for a portion of the 268 acre tract of land located at 1040 Pine Avenue SE, Warren, Ohio.
3. The Pond #5 and Pond #56 were constructed to manage process wastewater used in steel manufacturing. Pond #5 may also have been used to store industrial sludge from the wastewater treatment plant. BDM is closing both ponds pursuant to a permit-to-install, which includes a closure plan, issued on September 2, 2014, under ORC Chapter 6111. The closure plan requires the removal of all liquids and residual materials from each pond, as well as impacted soils adjacent to each pond, and re-establishment of positive drainage by regrading and filling with approved material.
4. Closure of the ponds is estimated to generate 17,000 cubic yards of residual materials and impacted soils. The residual materials and impacted soils will be blended with material available on-site, such as slag, slag fines, or other on-site available materials, or lime or other stabilization/solidification agent, as needed, to yield a controlled fill material ("Blended Material"), estimated at 34,000 cubic yards. Blended Material is a solid waste.
5. On October 29, 2015, Ohio EPA received a request ("BDM's Request") from Hull & Associates, Inc., on behalf of BDM, for authorization to use Blended Material to fill in Pond #5, an enlarged Pond #5, or a combination of Pond #5 and Pond #56, without obtaining a landfill permit or paying solid waste disposal fees.
6. Use of the Blended Material to fill in Pond #5, an enlarged Pond #5, or a combination of Pond #5 and Pond #56, will minimize disposal of inert material in landfills and contribute to Ohio EPA's reuse and recycling objectives.
7. The constituent concentrations of the Blended Material will be below U.S. EPA's Regional Screening Levels ("RSLs") for industrial soil (with the exception of arsenic) and VAP industrial/commercial standards. The end use of the Facility is for industrial/commercial purposes, and therefore, the area(s) of Blended Material placement is restricted through an Environmental Covenant established under ORC Sections 5301.80 to 5301.92. Therefore, placement of Blended Material into the former pond areas will not cause a nuisance or harm human health or the environment.

8. ORC Section 3734.01(E) defines "solid wastes," in pertinent part, to mean "such unwanted residual solid or semisolid material as results from industrial, commercial, agricultural, and community operations...."
9. ORC Section 3734.01(F) defines "disposal," in pertinent part, to mean "the discharge, deposit, injection, dumping, spilling, leaking, emitting, or placing of any solid wastes...into or on any land or ground or surface water or into the air...."
10. ORC Section 3734.01(N) defines "facility," in pertinent part, to mean "any site, location, tract of land, installation, or building used for incineration, composting, sanitary landfilling, or other methods of disposal of solid wastes...."
11. The activities described in BDM's Request constitute disposal of solid waste at a facility.
12. ORC Sections 3734.02(C), 3734.05(A)(1), and 3734.05(A)(2), and OAC Chapters 3745-27, 3745-30, and 3745-37 require that a permit and license be obtained prior to establishment or modification of a solid waste facility.
13. The activities described in BDM's Request constitute establishment or modification of a solid waste facility and require that a permit and license be obtained prior to initiating such activities.
14. OAC Rule 3745-27-05(A) specifies the methods of solid waste disposal that are authorized in Ohio. This rule authorizes sanitary landfilling, incineration, and composting as acceptable disposal methods. In addition, OAC Rule 3745-27-05(A)(4) states that solid wastes may be disposed as engineered fill or by land application, provided the Director determines that such alternative methods will not create a nuisance or harm human health or the environment and are capable of complying with other applicable laws.
15. The proposed disposal method described in BDM's Request is a method other than sanitary landfilling, incineration, or composting, and, therefore requires authorization from the Director pursuant to OAC Rule 3745-27-05(A)(4).
16. Based upon a review of BDM's Request, Ohio EPA has determined that the disposal of Blended Material by the method described in BDM's Request can be performed without creating a nuisance or harming human health or the environment, and in compliance with other applicable laws, provided it is performed in accordance with BDM's Request and the orders specified below.

17. Pursuant to ORC Section 3734.02(G) and OAC Rule 3745-27-03(B), the Director, by order, may exempt any person generating, collecting, storing, treating, disposing of, or transporting solid wastes in such quantities or under such circumstances that, in the determination of the Director, are unlikely to adversely affect the public health or safety or the environment from any requirement to obtain a permit or license or comply with other requirements of ORC Chapter 3734. and any rules adopted thereunder.
18. Based upon a review of BDM's Request, Ohio EPA has determined that granting BDM an exemption from the requirements of ORC Sections 3734.02 and 3734.05 to obtain a permit and a license to establish a solid waste facility, as specified in Finding 11 of these Orders, is unlikely to adversely affect the public health or safety or the environment, provided that BDM performs the activities in accordance with BDM's Request and these Orders.
19. Pursuant to ORC Section 3734.57(A), the owner or operator of a solid waste disposal facility must collect and remit to the state a disposal fee for each ton of solid waste disposed at the facility. However, pursuant to ORC Section 3734.57(D)(1)(a), the fees levied under ORC Section 3734.57(A) do not apply to the disposal of solid wastes that are disposed of at a facility owned by the generator of the wastes when the solid waste facility exclusively disposes of solid waste generated at one or more premises owned by the generator regardless of whether the facility is located on the premises where the wastes are generated. BDM is the generator of the excavated residual materials and impacted soil and is the owner of the property where the waste will be disposed. Therefore, this fee is not applicable.
20. Pursuant to ORC Section 3734.573(A), the solid waste management policy committee of a single or joint solid waste management district is authorized to levy a generation fee on solid wastes generated within the solid waste management district. The Geauga-Trumbull Solid Waste Management District has levied a generation fee. However, pursuant to ORC Section 3734.573(H)(1), the fee levied under ORC Section 3734.573(A) does not apply to the management of solid wastes that are disposed of at a facility owned by the generator of the wastes when the solid waste facility exclusively disposes of solid waste generated at one or more premises owned by the generator regardless of whether the facility is located on a premises where the wastes were generated. BDM is the generator of the excavated residual materials and impacted soil and is the owner of the property where the waste will be disposed. Therefore, this fee is not applicable.

V. ORDERS

1. Pursuant to OAC Rule 3745-27-05(A)(4), BDM is hereby authorized to use Blended Material generated from closure of Pond #5 and Pond #56 as fill, as specified in BDM's Request and outlined in Finding 4 of these Orders, as an alternative disposal method. The residual materials shall not be blended with hazardous waste.
2. Pursuant to ORC Section 3734.02(G) and OAC Rule 3745-27-03(B), BDM is hereby exempted from the requirements contained in ORC Sections 3734.02(C), 3734.05(A)(1), and 3734.05(A)(2), and OAC Chapters 3745-27, 3745-30, and 3745-37 to obtain a permit and license to establish and operate a solid waste facility in order to dispose of Blended Material in Pond #5, an enlarged Pond #5, or a combination of Pond #5 and Pond #56, as specified in BDM's request.
3. Solid waste originating from any location other than Pond #5 and Pond #56, as described in Findings 1, 2, and 3 of these Orders, shall not be disposed at Pond #5, an enlarged Pond #5, or a combination of Pond #5 and Pond #56.
4. If Blended Material is not used to fill in Pond #5, an enlarged Pond #5, or a combination of Pond #5 and Pond #56, as specified in BDM's request, the material shall be subject to solid waste disposal requirements and shall be taken to a licensed solid waste disposal facility.
5. Not later than 60 days after filling and capping of the area(s) of Blended Material disposal, BDM shall submit the following to Supervisor, Division of Materials and Waste Management, Ohio EPA, Northeast District Office:
 - a. A report of the total volume in cubic yards of Blended Material used to fill in Pond #5, an enlarged Pond #5, or a combination of Pond #5 and Pond #56 as specified in BDM's Request and the total weight in tons of Blended Material taken to a licensed solid waste disposal facility.
 - b. Results of testing the Blended Material for TPH C20-C34 content, total solids analysis, permeability, and the moisture content and density from the test sections.
 - c. A report correlating the number of passes used on test sections, the corresponding TPH and permeability results, and the number of passes used to compact the corresponding Blended Material.


- d. As-built drawings of Pond #5, an enlarged Pond #5, or a combination of Pond #5 and Pond #56 where Blended Material was disposed.
7. The authorization granted in Order 1 and the exemptions granted in Order 2 shall apply only to the use of Blended Material as structural fill as proposed in BDM's request and described in Findings 3 and 4 of these Orders and shall be limited to fill in Pond #5, an enlarged Pond #5, or a combination of Pond #5 and Pond #56.
8. Nothing in these Orders shall be construed to authorize any activity that deviates from the permit-to-install issued September 2, 2014 for closure of Pond #5 and Pond #56. Nothing in these Orders shall be construed to authorize any activity, method, or waiver from the requirements of ORC Chapter 3734. or the regulations promulgated thereunder, except as expressly provided herein. These Orders shall not be interpreted to release BDM from responsibility under ORC Chapters 3704., 3734., including the requirements in 3734.02(H) and OAC Rule 3745-27-013, or 6111.; under the Federal Clean Water Act, the Resource Conservation and Recovery Act, or the Comprehensive Environmental Response, Compensation, and Liability Act; or from other applicable requirements for remedying conditions resulting from any release of contaminants to the environment.
9. Pursuant to ORC Sections 5301.80 to 5301.92 and ORC Section 3745.01, the Ohio EPA and BDM have entered into an Environmental Covenant (attached as Attachment A, and fully incorporated herein) for the purpose of subjecting the property, described as the Pond #5 area and the Pond #56 area, to certain activity and use limitations.

VI. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state, and federal laws and regulations. Nothing in these Orders shall be construed as waiving or compromising in any way the applicability and enforcement of any other statutes or regulations applicable to BDM or to the property described as the Pond #5 area and the Pond #56 area. Ohio EPA reserves all rights and privileges except as specified herein.

BDM Warren Steel Holdings, LLC, Trumbull County
IAWMP Approval - DFFOs
Page 7 of 7

IT IS SO ORDERED:

A handwritten signature in black ink, appearing to read "Craig W. Butler", is written over a horizontal line.


Craig W. Butler

Director

Ohio Environmental Protection Agency

Attachment A

Environmental Covenant


Instr: 201512010022766 12/01/2015
P: 1 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024820
Trumbull County Recorder EPBDM STEE

**To be recorded with Deed
Records - ORC §317.08**

ENVIRONMENTAL COVENANT

This Environmental Covenant is entered into by BDM Warren Steel Holdings, LLC (BDM) ("Owner"), and the Ohio Environmental Protection Agency ("Ohio EPA") pursuant to Ohio Revised Code ("ORC") §§ 5301.80 to 5301.92 for the purpose of subjecting the Property known as Pond 5 Area and Pond 56 Area to the activity and use limitations and specified obligations set forth herein.

This Environmental Covenant is created to facilitate the performance of the environmental response project consisting of the closure of Pond 5 Area and Pond 56 Area, consistent with the requirements of ORC Chapters 6111, 3734, Section 3734.02(G) and Ohio Administrative Code Section 3745-27-05(A). Pond 5 Area and Pond 56 Area are located in the City of Warren in Trumbull County, Ohio. The administrative record for the environmental response project is contained in the files for BDM Warren Steel Holdings, LLC, and located at the Ohio EPA's Central Office in Franklin County, Ohio. Owner is closing both ponds pursuant to a permit-to-install issued on September 2, 2014, under ORC Chapter 6111. The closure plan requires the removal of all liquids and residual materials from each pond, as well as impacted soils adjacent to each pond, and re-establishing positive drainage by re-grading and filling with approved material.

Closure of Pond 5 Area and Pond 56 Area will generate residual materials and impacted soils. In accordance with the Director's Final Findings and Orders ("the Orders") to which this Environmental Covenant shall be attached, the residual materials and impacted soils may be blended with material available on-site, such as slag, slag fines, or other on-site available materials, or lime or other stabilization/solidification agents, to yield a solid waste Blended Material for use as structural fill in Pond 5 Area and Pond 56 Area. In accordance with the Orders, the residual materials shall not be blended with hazardous waste.

Now therefore, Owner BDM Warren Steel Holdings and Ohio EPA agree to the following:

1. Environmental Covenant. This instrument is an environmental covenant developed and executed pursuant to ORC §§ 5301.80 to 5301.92.

2. Property. This Environmental Covenant concerns Pond 5 Area situated on a part of an approximately 10.56 acre tract of land identified by the Trumbull County Auditor as Parcel Number 43-313400, and Pond 56 Area situated on a part of an approximately 65.49 acre tract of land identified by the Trumbull County Auditor as Parcel Number 28-694800. Parcel Number 43-313400 and Parcel Number 28-694800 are situated on a part of Parcel B, which is a parcel located on a portion of an approximately 268 acre tract of land identified by the Trumbull County Recorder as instrument number 201210240026388 owned by BDM Warren Steel Holdings, LLC, located in Trumbull County, Ohio, more particularly described in Exhibit A, as depicted in a copy of the Deed filed with the Trumbull County Recorder, attached hereto and hereby fully incorporated by reference herein as Exhibit A. Exhibit B includes the legal description of "Pond 5 Area" subject to this Environmental Covenant, depicted in the attached metes and bounds survey narrative and map of the tract described as "Pond 5 Area," attached hereto and hereby fully incorporated by reference herein as Exhibit B. Exhibit C includes the legal description of "Pond 56 Area" subject to this Environmental Covenant, depicted in the attached metes and bounds survey narrative and map of the tract described as "Pond 56 Area," attached hereto and hereby fully incorporated by reference herein as Exhibit C. The property subject to this Environmental Covenant consists solely of "Pond 5 Area" and "Pond 56 Area" (collectively "the Property").

3. Owner. BDM Warren Steel Holdings, LLC ("Owner"), which is located at 1040 Pine Ave SE, Warren, Ohio 43055 is the owner of the Property.

4. Holder. Pursuant to ORC § 5301.81, Owner, whose address is listed above, is the holder of this Environmental Covenant.

5. Activity and Use Limitations. In accordance with the referenced Orders, Owner hereby imposes and agrees to comply with the following activity and use limitations:

Building or Construction on Property – There shall be no construction or installment of buildings or other structures, including but not limited to the construction of any commercial, industrial, residential or recreational structure, landing strip, billboard, advertising display, antenna, tower, or storage tank, or paved or aggregate roads or surfaces.

Drilling or Mining – There shall be no drilling or mining on the Property.

Filling, Grading or Excavating – There shall be no filling, grading, or excavating on the Property, except in accordance with the closure plan and the Orders.

Storage and Disposal of Waste – There shall be no storage or disposal of wastes on the Property, except in accordance with the closure plan and the Orders.

Land Use Limitations – The Property shall not be used for any residence, daycare facility, nursing home, elder care or other long-term health care facility, correctional facility, or school, college or other educational institution.

The Property is hereby limited to only commercial land use and/or industrial land use, as those terms are defined herein. For purposes of this Environmental Covenant, the definitions of "commercial land use" and "industrial land use" are set forth below:

Commercial land use is "land use with potential exposure of adult workers during a business day and potential exposure of adults and children who are customers, patrons, or visitors to commercial facilities during the business day. Commercial land use has potential exposure of adults to dermal contact with soil, inhalation of vapors and particles from soil and ingestion of soil."

Industrial land use is "land use with potential exposure of adult workers during a business day and potential exposures of adults and children who are visitors to industrial facilities during the business day. Industrial land use has potential exposure of adults to dermal contact with soil, inhalation of vapors and particles from soil and ingestion of soil."

Limitation Prohibiting Ground Water Extraction and Use – Ground water underlying the Property shall not be extracted or used for any purpose, potable or otherwise, except for investigation; monitoring or remediation of the ground water.

6. Running with the Land. This Environmental Covenant shall be binding upon the Owner and all assigns and successors in interest, including any Transferee, and shall run with the land, pursuant to ORC § 5301.85, subject to amendment or termination as set forth herein. The term "Transferee," as used in this Environmental Covenant, shall mean any future owner of any interest in the Property or any portion thereof, including, but not limited to, owners of an interest in fee simple, mortgagees, easement holders, and/or lessees.

7. Compliance Enforcement. Compliance with this Environmental Covenant may be enforced pursuant to ORC § 5301.91. Failure to timely enforce compliance with this Environmental Covenant or the activity and use limitations contained herein by any party shall not bar subsequent enforcement by such party and shall not be deemed a waiver of the party's right to take action to enforce any non-compliance. Nothing in this Environmental Covenant shall restrict the Director of Ohio EPA from exercising any authority under applicable law.

8. Rights of Access. Owner hereby grants to Ohio EPA, its agents, contractors, and employees the right of access to the Property for implementation or enforcement of this Environmental Covenant.

9. Compliance Reporting. Owner or any Transferee shall submit to Ohio EPA on an annual basis written documentation verifying that the activity and use limitations remain in place and are being complied with.

10. Notice upon Conveyance. Each instrument hereafter conveying any interest in the Property or any portion of the Property shall contain a notice of the activity and use limitations set forth in this Environmental Covenant, and provide the recorded location of this Environmental Covenant. The notice shall be substantially in the following form:

THE INTEREST CONVEYED HEREBY IS SUBJECT TO AN ENVIRONMENTAL COVENANT, DATED _____, 20____, RECORDED IN THE DEED OR OFFICIAL RECORDS OF THE _____ COUNTY RECORDER ON _____, 20____, IN [DOCUMENT _____, or BOOK____, PAGE ____]. THE ENVIRONMENTAL COVENANT CONTAINS THE FOLLOWING ACTIVITY AND USE LIMITATIONS:

Building or Construction on Property – There shall be no construction or installment of buildings or other structures, including but not limited to the construction of any commercial, industrial, residential or recreational structure, landing strip, billboard, advertising display, antenna, tower, or storage tank, or paved or aggregate roads or surfaces.

Drilling or Mining – There shall be no drilling or mining on the Property.

Filling, Grading or Excavating – There shall be no filling, grading, or excavating on the Property, except in accordance with the closure plan and the Orders.

Storage and Disposal of Waste – There shall be no storage or disposal of wastes on the Property, except in accordance with the closure plan and the Orders.

Land Use Limitations – The Property shall not be used for any residence, daycare facility, nursing home, elder care or other long-term health care facility, correctional facility, or school, college or other educational institution.

The Property is hereby limited to only commercial land use and/or industrial land use, as those terms are defined herein. For purposes of this Environmental Covenant, the definitions of "commercial land use" and "industrial land use" are set forth below:

Commercial land use is "land use with potential exposure of adult workers during a business day and potential exposure of adults and children who are customers, patrons, or visitors to commercial facilities during the business day. Commercial land use has potential exposure of adults to dermal contact with soil, inhalation of vapors and particles from soil and ingestion of soil."

Industrial land use is "land use with potential exposure of adult workers during a business day and potential exposures of adults and children who are visitors to industrial facilities during the business day. Industrial land use has potential exposure of adults to dermal contact with soil, inhalation of vapors and particles from soil and ingestion of soil."

Limitation Prohibiting Ground Water Extraction and Use – Ground water underlying the Property shall not be extracted or used for any purpose, potable or otherwise, except for investigation, monitoring or remediation of the ground water.

Owner shall notify Ohio EPA within ten (10) days after each conveyance of an interest in any portion of the Property. Owner's notice shall include the name, address, and telephone number of the Transferee, a copy of the deed or other documentation evidencing the conveyance, and a survey map that shows the boundaries of the property being transferred.

11. Representations and Warranties. Owner hereby represents and warrants to the other signatories hereto:

a. that the Owner holds fee simple title to the Property as the sole owner of the Property;

b. that the Owner obtained a title insurance policy dated October 24, 2012 that depicts that the Property is subject to specific encumbrances; that the Owner is not aware of any other encumbrances on the Property; that the Owner is not aware of any encumbrance that conflicts with the activity and use limitations set forth in this environmental covenant.

c. that the Owner has the power and authority to enter into this Environmental Covenant, to grant the rights and interests herein provided and to carry out all obligations hereunder; and

d. that this Environmental Covenant will not materially violate or contravene or constitute a material default under any other agreement, document or instrument to which Owner is a party of by which Owner may be bound or affected.

12. Amendment or Termination. This Environmental Covenant may be amended or terminated by consent of all of the following: the Owner or a Transferee; and the Ohio EPA, pursuant to ORC § 5301.90 and other applicable law. The term, "Amendment," as used in this Environmental Covenant shall mean any changes to the Environmental Covenant, including the activity and use limitations set forth herein, or the elimination of one or more activity and use limitations when there is at least one limitation remaining. The term, "Termination," as used in this Environmental Covenant, shall mean the elimination of all activity and use limitations set forth herein and all other obligations under this Environmental Covenant. This Environmental Covenant may be amended or terminated only by a written instrument duly executed by the Director of Ohio EPA and the Owner or Transferee of the Property or portion thereof, as applicable. Within thirty (30) days of signature by all requisite parties on any amendment or termination of this Environmental Covenant, the Owner or Transferee shall file such instrument for recording with the Trumbull County Recorder's Office, and shall provide a file- and date-stamped copy of the recorded instrument to Ohio EPA.

13. Severability. If any provision of this Environmental Covenant is found to be unenforceable in any respect, the validity, legality, and enforceability of the remaining provisions shall not in any way be affected or impaired.

14. Governing Law. This Environmental Covenant shall be governed by and interpreted in accordance with the laws of the State of Ohio.

15. Recordation. Within ten (10) days after the date of the final required signature upon this Environmental Covenant, Owner shall file this Environmental Covenant for recording, in the same manner as a deed to the Property, with the Trumbull County Recorder's Office.

16. Effective Date. The effective date of this Environmental Covenant shall be the date upon which the fully executed Environmental Covenant has been recorded as a deed record for the Property with the Trumbull County Recorder.

17. Distribution of Environmental Covenant. The Owner shall distribute a file- and date-stamped copy of the recorded Environmental Covenant to: Ohio EPA; the Health Department; the Holders; such unit of local government in which the Property is located, and each person who signed the Environmental Covenant.

Instr: 201512010022766 12/01/2015
P: 7 of 39 F: \$324.00 11:42AM AGF
Diana Marchese T20150024820
Trumbull County Recorder EPBDM STEE

18. Notice. Unless otherwise notified in writing by Ohio EPA, any document or communication required by this Environmental Covenant shall be submitted to:

Chief
Division of Materials and Waste Management
Ohio EPA
P.O. Box 1049
Columbus, Ohio 43216-1049

OHIO ENVIRONMENTAL PROTECTION AGENCY


Craig W. Butler, Director

11/24/15
Date

State of Ohio EPA

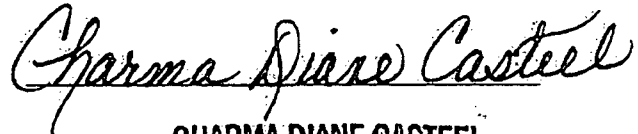
County of Franklin

) SS:
)

Before me, a notary public, in and for said county and state, personally appeared Craig W. Butler, the Director of Ohio EPA, who acknowledged to me that he did execute the foregoing instrument on behalf of Ohio EPA.

IN TESTIMONY WHEREOF, I have subscribed my name and affixed my official seal the 24th day of NOVEMBER, 2015.





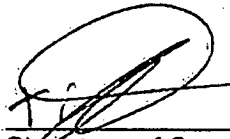
CHARMA DIANE CASTEEL
NOTARY PUBLIC
STATE OF OHIO
MY COMMISSION EXPIRES

Notary Public May 10, 2019

Prepared By:
Janine Maney, Attorney for Ohio EPA

The undersigned representative of the: Owner and Holder with a recorded interest in the Property represent and certify that the representative is authorized to execute this Environmental Covenant.

IT IS SO AGREED:



Signature of Owner

XCJBATTERS
BDM Warren Steel Holdings, LLC

Date

11/10/15

State of Pennsylvania)
County of Deaver) ss:

Before me, a notary public, in and for said county and state, personally appeared, Charles J. Batters, a duly authorized representative of BDM Warren Steel Holdings who acknowledged to me that the representative did execute the foregoing instrument on behalf of BDM Steel Warren Holdings.

IN TESTIMONY WHEREOF, I have subscribed my name and affixed my official seal this 11 day of Nov., 2015.

Donna Louise Essey
Notary Public

NOTARIAL
SEAL

Prepared By:
Donald Graham, Attorney for Owner BDM

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Donna Louise Essey, Notary Public
Hopewell Twp., Beaver County
My Commission Expires Oct. 29, 2018
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES



Instr: 201512010022766 12/01/2016
P: 10 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024820
Trumbull County Recorder EPBDM STEE

Exhibit A

Deed Recorded as instrument number 201210240026388

Instr: 20121024028300 10/24/2012
P: 11 of 21 F: \$180.00 1:05PM
Diana Marchese T20120331660
Trumbull County Recorder BX1701 VS

Instr: 201512010022766 12/01/2015
P: 11 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024820
Trumbull County Recorder EPBDM STEE

REAL PROPERTY TRANSFER TAX
TRANSFERRED AND PAID

TRUMBULL COUNTY

OCT 24 2012

OCT 23 2012

GIS/TAX MAP DEPT

GIS/MAP DEPT. NOTE:
NEXT TRANSFER
WILL REQUIRE SURVEY
Lordstown Spur only

In the amount of 16,000.00
Adrian S. Biviano, Trumbull County Auditor

QUITCLAIM DEED

KNOW ALL MEN BY THESE PRESENTS that, **RC STEEL WARREN, LLC**, a Delaware limited liability company, formerly known as Severstal Warren, LLC, successor by merger with Severstal Warren, Inc., successor by merger with WCI Steel, Inc., formerly known as WCI Steel Acquisition, Inc., GRANTOR, for valuable consideration paid, does hereby GRANT, CONVEY, and QUITCLAIM without warranty of any kind to and **BDM WARREN STEEL HOLDINGS, LLC**, an Ohio limited liability company, GRANTEE, whose tax mailing address is 100 Bet-Tech Drive, Aliquippa, Pennsylvania, 15001, all of its right, title and interest in and to the following described real estate:

LORDSTOWN SPUR:

Situated in the State of Ohio, County of Trumbull, Township of Lordstown, Sections 9, 12, 29, 30, 31, and 32, and being more fully described as follows:

Beginning at a point in the centerline of Burnett East Road, said point also being on the line dividing Warren Township with Lordstown Township, and on the line dividing the lands now or formerly owned by A. B. Powrie, et al with the lands now or formerly owned by Guy and Mary Ross;

Thence South 02 deg. 52' West along the line dividing the lands now or formerly owned by A. B. Powrie, et al with the lands now or formerly owned by Guy and Mary Ross a distance of 1957.6 feet to a point;

Thence continuing South 02 deg. 52' West along the line dividing the lands now or formerly owned by A. B. Powrie, et al with the lands now or formerly owned by the Reserve Realty and Mortgage Company a distance of 454.5 feet to a point;

Thence continuing South 02 deg. 52' West a distance of 130.75 feet to a point;

Thence South 18 deg. 49' East, passing over the line dividing Section 9 with Section 12, a distance of 235 feet to a point;

Thence South 09 deg. 26' East a distance of 209.6 feet to a point;

Thence South 02 deg. 52' West a distance of 1337.89 feet to a point;

Thence South 02 deg. 31' West a distance of 1049.92 feet to a point on the line dividing Section 12 with Section 29;

Thence South 02 deg. 10' 30" West a distance of 2672.38 feet to a point on the centerline of Moser Road, now known as W. Park Avenue Extension, and the line dividing Section

Instr: 201210240026388 10/24/2012
P: 2 of 21 P: \$180.00 1:08PM
Diana Marchese T20120031660
Trumbull County Recorder BX1761 VRL

Instr: 201512010022765 12/01/2015
P: 12 of 39 P: \$324.00 11:42AM RGR
Diana Marchese T20150024820
Trumbull County Recorder EPBOM STEE

29 with Section 32;

Thence South 02 deg. 04' West a distance of 1865.69 feet to a point;

Thence by a curve to the right having a radius of 758.5 feet and an arc length of 1070.34 feet, said curve also being defined by a chord having a bearing and distance of South 42 deg. 29' 32" West, 983.72 feet, to a point on the Northerly line of lands now or formerly owned by the B&O Railroad Company;

Thence South 78 deg. 28' 30" East along said Northerly railroad line a distance of 722.73 feet to a point on the line dividing Section 32 with Section 31;

Thence North 02 deg. 04' East along said Northerly railroad line and the line dividing Section 32 with Section 31 a distance of 20.00 feet to a point;

Thence South 78 deg. 28' 30" East along said Northerly railroad line a distance of 340.10 feet to a point;

Thence by a curve to the right having a radius of 791.5 feet and an arc length of 757.30 feet, said curve also being defined by a chord having a bearing and distance of North 25 deg. 20' 35" West 728.74 feet, to a point on the line dividing Section 31 with Section 32;

Thence North 02 deg. 04' East along said dividing line a distance of 2122.41 feet to a point on the centerline of Moser Road, now known as West Park Avenue Extension, and the corner of Sections 29, 30, 31, and 32;

Thence South 88 deg. 02' 30" East along said centerline of Moser Road, now known as West Park Avenue Extension, and the line dividing Section 31 with Section 30 a distance of 524.83 feet to a point on the line dividing the lands now or formerly owned by B. F. Lane with the lands now or formerly owned by Ellen Gillingham;

Thence North 01 deg. 57' 30" West along said dividing line a distance of 2667.37 feet to a point on the line dividing Section 30 with Section 11;

Thence North 87 deg. 30' West along said dividing line a distance of 504.5 feet to a point at the corner of Sections 11, 12, 29, and 30;

Thence North 02 deg. 31' East along the line dividing Section 11 with Section 12 a distance of 1049.92 feet to points;

Thence North 02 deg. 52' East along said dividing line and passing through the corner of Sections 9, 10, 11 and 12 a distance of 1742.25 feet to a point;

Thence continuing North 02 deg. 52' East along the line dividing Section 9 with Section 10 a distance of 149.5 feet to a point on the line dividing the lands now or formerly owned by B. F. Lane with the land, now or formerly owned by the Reserve Realty and Mortgage Company;

Thence North 87 deg. 08' West along said dividing line a distance of 131.5 feet to a point;

Thence North 02 deg. 52' East a distance of 454.85 feet to a point;

Thence North 02 deg. 52' East a distance of 1957.73 feet to a point on the centerline of Burnett East Road and the line dividing Lordstown Township with Warren Township;

Thence North 87 deg. 30' West along said centerline and said Township line a distance of 75 feet to the place of beginning, containing 55.884 acres of land, more or less.

Instr: 201210240026398 10/24/2012
P: 3 of 21 F: \$100.00 1:05PM
Diana Marchese T20120031680
Trumbull County Recorder 821781 VRL

Instr: 201512010022766 12/01/2015
P: 13 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024920
Trumbull County Recorder EPBDM STEE

The above description is based on Trumbull County Records and LTV Steel Company, Inc. (F.K.A. Republic Steel Corporation - Warren Works) Drawing No. 15297. It is not to be construed as an actual survey by Mosure & Syrakos Co. of the Premises.

The description has been prepared by Thomas F. Mosure, Registered Surveyor No. 4718.

Being Auditor's Parcel No. _____

LEASE AREA TO STANDARD SLAG:

Situated in the State of Ohio, County of Trumbull, Township of Warren, Section 42, and being more fully described as follows:

Commencing at a point at the junction of the centerline of South Main Street (Austintown Warren Road) with the centerline of Burnett East Road, said point also being on the Southerly line of Warren Township, Section 42;

Thence North 81 deg. 18' 00" West along said centerline of Burnett East Road and said Southerly line of Section 42 a distance of 1,270.86 feet to a point, and the true place of beginning for the lease herein described;

Thence continuing North 81 deg. 18' 00" West along said centerline of Burnett East Road and said Southerly line of Section 42 a distance of 922.20 feet to a point;

Thence North 08 deg. 07' 00" East a distance of 1306.98 feet to a point;

Thence North 27 deg. 30' 00" East a distance of 655.97 feet to a point;

Thence South 86 deg. 39' 00" East a distance of 399.44 feet to a point;

Thence South 28 deg. 14' 50" West a distance of 129.01 feet to a point;

Thence South 01 deg. 06' 21" West a distance of 756.70 feet to a point;

Thence South 82 deg. 20' 58" East a distance of 274.02 feet to a point;

Thence South 08 deg. 56' 30" West a distance of 1,042.75 feet to a point;

Thence South 08 deg. 42' 00" West a distance of 55.77 feet to the place of beginning, containing 33.740 acres of land, more or less.

The above lease is subject to any rights The Pittsburgh, Youngstown, and Ashtabula Railway Company, its successors and assigns, and the Pittsburgh, Cleveland, and Toledo Railroad Company, its successors and assigns, have or ought to have over, through, or across said property.

The above lease is based on a survey made by Thomas F. Mosure, Registered Surveyor No. 4718 in May, 1988.

The hereinabove described lease is also subject to all easements, rights of way, licenses, leases, covenants, reservations, restrictions, limitations, encumbrances of record and to all matters shown on survey or those matters which an inspection of the Premises would disclose; to zoning ordinances; and to legal highways.

Being Auditor's Parcel No. _____

BUY BACK PARCEL:

Instr: 201210240028388 10/25/2012
P: 4 of 21 P: \$100.00 1:25PM
Diana Marchese T20120031650
Trumbull County Recorder BX(76) VR

Instr: 201512010022766 12/01/2015
P: 14 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20160024820
Trumbull County Recorder EPBDM STEE

Situated in State of Ohio, County of Trumbull, Township of Warren, Section 42, and being more fully described as follows:

Commencing at a point at the junction of the centerline of Burnett East Road with the centerline of South Main Street (Austintown-Warren Road);

Thence North 07 deg. 37' 00" West along said centerline of South Main Street a distance of 1,328.97 feet to a point;

Thence North 01 deg. 55' 00" East along said centerline of South Main Street a distance of 970.22 feet to a point;

Thence North 00 deg. 05' 16" West along said centerline of South Main Street a distance of 699.36 feet to a point, and the true place of beginning for the parcel herein described;

Thence South 84 deg. 59' 27" West a distance of 132.29 feet to a point;

Thence South 02 deg. 50' 16" East a distance of 306.42 feet to a point;

Thence South 84 deg. 51' 22" West a distance of 326.48 feet to a point;

Thence North 05 deg. 29' 27" West a distance of 590.75 feet to a point;

Thence North 00 deg. 36' 55" East a distance of 297.66 feet to a point;

Thence North 89 deg. 15' 18" East a distance of 104.95 feet to a point;

Thence North 00 deg. 44' 52" West a distance of 192.35 feet to a point;

Thence North 89 deg. 19' 13" East a distance of 115.19 feet to a point;

Thence South 01 deg. 28' 16" East a distance of 207.34 feet to a point;

Thence South 88 deg. 59' 22" East a distance of 68.72 feet to a point;

Thence South 03 deg. 01' 22" East a distance of 256.28 feet to a point;

Thence North 79 deg. 58' 01" East, passing over the centerline of South Main Street, a distance of 252.89 feet to a point;

Thence North 90 deg. 00' 00" East a distance of 80.00 feet to a point on the centerline of the Mahoning River;

Thence South 15 deg. 05' 14" East along said centerline of the Mahoning River a distance of 304.89 feet to a point;

Thence South 84 deg. 59' 27" West a distance of 219.27 feet to the place of beginning, containing 9.266 acres of land, more or less, all of which is in the Township of Warren Section 42.

The above description is subject to any rights The Pittsburgh, Youngstown, and Ashtabula Railway Company, its successors and assigns, and the Pittsburgh, Cleveland, and Toledo Railroad Company, its successors and assigns, have or ought to have over, through, or across said property.

The above description is based on a survey made by Thomas F. Mosure, Registered Surveyor No. 4718 in May, 1988.

Instr: 201210240326388 10/24/2012
P: 5 of 21 F: \$160.00 1:08PM
Diana Marchese T20120031690
Trumbull County Recorder DX(76) VRL

Instr: 201512010022766 12/01/2015
P: 15 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024020
Trumbull County Recorder EP8DM STEE

The hereinabove described real estate is also subject to all easements, rights of way, licenses, leases, covenants, reservations, restrictions, limitations, encumbrances of record and to all matters shown on survey or those matters which an inspection of the Premises would disclose; to zoning ordinances; and to legal highways.

Being Auditor's Parcel No. _____.

PARCEL B:

Situated in the Township of Warren, County of Trumbull and State of Ohio:

And known as being situated in the State of Ohio, County of Trumbull, Township of Warren, Sections 41, 42, 35 and 28, Township of Howland, Section 31, Township of Weathersfield, Section 10, and in the City of Warren, and being more fully described as follows:

Beginning at a point at the junction of the centerline of Dover Street with the centerline of South Main Street (Austintown Warren Road), said point also being on the line dividing Warren Township Section 35 with Warren Township 42;

Thence South 81 deg. 00' 16" East along said line dividing said Section 35 and Section 42 and the Southerly line of the J. J. Gillens Subdivision No. 1 a distance of 375.00 feet to a point;

Thence North 06 deg. 35' 44" East along the Easterly line of said J. J. Gillens Subdivision No. 1 a distance of 663.85 feet to a point;

Thence South 83 deg. 47' 16" East along the Southerly line of the C. W. Ulrich Plat No. 1 a distance of 110.00 feet to a point;

Thence North 05 deg. 58' 44" East along the Easterly line of said C. W. Ulrich Plat No. 1 a distance of 480.25 feet to a point;

Thence North 83 deg. 43' 16" West along the Northerly line of said C. W. Ulrich Plat No. 1 a distance of 32.00 feet to a point;

Thence North 21 deg. 08' 14" East along the West bank of the Mahoning River a distance of 332.25 feet to a point;

Thence North 11 deg. 23' 46" West along the West bank of the Mahoning River a distance of 343.82 feet to a point;

Thence South 85 deg. 23' 46" East along the West bank of the Mahoning River a distance of 51.47 feet to a point;

Thence North 04 deg. 12' 51" West along the West bank of the Mahoning River a distance of 471.88 feet to a point;

Thence North 04 deg. 12' 51" West along the West bank of the Mahoning River a distance of 265.10 feet to a point;

Thence North 89 deg. 45' 09" East along the West bank of the Mahoning River a distance of 26.60 feet to a point;

Thence North 04 deg. 12' 51" West along the West bank of the Mahoning River a distance of 251.70 feet to a point;

Thence North 89 deg. 54' 09" East along the West bank of the Mahoning River a distance



Instr: 201512010022766 12/01/2015
P: 16 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024820
Trumbull County Recorder EPBDM STEE

Instr: 201210240026386 10/24/2012
P: 6 of 21 F: \$185.00 1:06PM
Diana Marchese T20120031660
Trumbull County Recorder .BA(76) VR

of 44.70 feet to a point;

Thence North 04 deg. 12' 51" West along the West bank of the Mahoning River a distance of 200.90 feet to a point;

Thence North 89 deg. 27' 09" East along the West bank of the Mahoning River a distance of 32.20 feet to a point;

Thence North 04 deg. 12' 51" West along the West bank of the Mahoning River a distance of 395.60 feet to a point;

Thence South 81 deg. 48' 51" East a distance of 131.72 feet to a point in the center of the Mahoning River;

Thence North 09 deg. 16' 51" West along said centerline of the Mahoning River a distance of 115.18 feet to a point;

Thence North 16 deg. 12' 09" East along said centerline of the Mahoning River a distance of 402.00 feet to a point;

Thence North 34 deg. 23' 09" East along said centerline of the Mahoning River a distance of 147.90 feet to a point;

Thence North 09 deg. 26' 09" East along said centerline of the Mahoning River a distance of 229.50 feet to a point;

Thence North 14 deg. 16' 09" East along said centerline of the Mahoning River a distance of 82.05 feet to a point;

Thence North 23 deg. 24' 51" West along said centerline of the Mahoning River a distance of 190.20 feet to a point on the line dividing Warren Township Section 35 with Warren Township Section 28;

Thence North 58 deg. 09' 51" West along said centerline of the Mahoning River a distance of 79.50 feet to a point;

Thence North 05 deg. 41' 09" East along the Southerly line of land now or formerly owned by The Warren-Niles Republic Employees Federal Credit Union and its Southerly Extension a distance of 321.37 feet to a point;

Thence South 84 deg. 18' 51" East along said Southerly line of land now or formerly owned by The Warren-Niles Republic Employees Federal Credit Union a distance of 257.63 feet to a point on the existing Westerly right of way line of Pine Street (Niles-Warren River Road);

Thence South 30 deg. 35' 51" East along said existing Westerly right of way line a distance of 194.20 feet to a point;

Thence South 39 deg. 03' 51" East along said existing Westerly right of way line a distance of 278.22 feet to a point;

Thence South 43 deg. 15' 51" East along said existing Westerly right of way line, passing over the line dividing Warren Township Section 28 with Warren Township Section 35, a distance of 136.67 feet to a point;

Thence South 48 deg. 28' 51" East along said existing Westerly right of way line a distance of 332.53 feet to a point;

Instr: 201210240526388 10/24/2012
P: 7 of 21 F: \$180.00 1:05PM
Diana Marchese T20120031880
Trumbull County Recorder BX1761 VRL

Instr: 201512010022766 12/01/2015
P: 17 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024820
Trumbull County Recorder EP80M STEE

Thence South 34 deg. 52' 51" East along said existing Westerly right of way line a distance of 201.38 feet to a point;

Thence South 30 deg. 30' 51" East along said existing Westerly right of way line, passing over the line dividing Warren Township Section 35 with Howland Township Section 31, a distance of 523.60 feet to a point on the Westerly right of way line of land now or formerly owned by the Pittsburgh, Youngstown, and Ashtabula Railway Company;

Thence South 09 deg. 51' 17" East along said Westerly right of way line, parallel to and 66.00 feet Westerly from the centerline of the Westbound main, distance of 2,507.37 feet to a point;

Thence South 02 deg. 42' 07" East along said Westerly right of way line a distance of 473.84 feet to a point;

Thence South 09 deg. 51' 17" East along said Westerly right of way line, parallel to and 125.00 feet Westerly from the centerline of the Westbound main, a distance of 1,668.48 feet to a point;

Thence along said Westerly right of way line by a curve to the left having a radius of 573.68 feet and an arc length of 265.24 feet, said curve also being defined by a chord having a bearing and distance of North 03 deg. 06' 53" East, 262.89 feet to a point;

Thence South 09 deg. 51' 16" East along said Westerly right of way line, parallel to and 66.00 feet Westerly from the centerline of the Westbound main, a distance of 1,542.07 feet to a point;

Thence along said Westerly right of way line, parallel to and 66.00 feet Westerly from the centerline of the Westbound main, by a curve to the left having a radius of 5,795.65 feet and an arc length of 4.44 feet, said curve also being defined by a chord having a bearing and distance of South 09 deg. 52' 36" East, 4.44 feet to a point;

Thence South 81 deg. 15' 51" East along said Westerly right of way line a distance of 8.44 feet to a point;

Thence along said Westerly right of way line, parallel to and 58.00 feet Westerly from the centerline of the Westbound main, by a curve to the left having a radius of 5,787.65 feet and an arc length of 841.58 feet, said curve also being defined by a chord having a bearing and distance of South 14 deg. 05' 28" East, 840.84 feet to a point;

Thence South 18 deg. 15' 24" East along said Westerly right of way line, parallel to and 58.00 feet Westerly from the centerline of the Westbound main, a distance of 736.61 feet to a point;

Thence North 80 deg. 57' 54" West along said Westerly right of way line a distance of 225.05 feet to a point;

Thence South 18 deg. 15' 24" East along said Westerly right of way line, parallel to and 258.00 feet Westerly from the centerline of the Westbound main, a distance of 1,204.40 feet to a point on the line dividing Howland Township Section 31 with Weathersfield Township Section 10;

Thence South 80 deg. 57' 54" East along said Township line a distance of 162.04 feet to a point;

Thence South 18 deg. 15' 24" East along the Westerly right of way line of land now or formerly owned by the Pittsburgh, Youngstown and Ashtabula Railway Company, parallel to and 100.00 feet Westerly from the centerline of the Eastbound main, a distance of

Instr: 201210240028388 10/24/2012
Pg of 21 F: \$100.00 11:06AM
Diana Marchese T20120031680
Trumbull County Recorder BX1781 VRL

Instr: 201512010022766 12/01/2015
Pg of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024820
Trumbull County Recorder EPBDM STEE

723.90 feet to a point;

Thence South 71 deg. 44' 36" West a distance of 928.38 feet to a point in the centerline of the Mahoning River;

Thence North 63 deg. 52' 31" West along said centerline of the Mahoning River a distance of 101.30 feet to a point;

Thence North 65 deg. 43' 51" West along said centerline of the Mahoning River a distance of 101.00 feet to a point;

Thence North 73 deg. 43' 51" West along said centerline of the Mahoning River a distance of 302.00 feet to a point;

Thence North 49 deg. 58' 51" West along said centerline of the Mahoning River a distance of 227.00 feet to a point;

Thence North 35 deg. 28' 51" West along said centerline of the Mahoning River a distance of 218.00 feet to a point;

Thence North 19 deg. 28' 51" West along said centerline of the Mahoning River a distance of 296.00 feet to a point;

Thence North 01 deg. 53' 11" West along said centerline of the Mahoning River a distance of 450.42 feet to a point on the line dividing Weathersfield Township Section 10 with Howland Township Section 31;

Thence North 07 deg. 34' 17" East along said centerline of the Mahoning River a distance of 480.52 feet to a point;

Thence North 12 deg. 28' 16" East along said centerline of the Mahoning River a distance of 469.58 feet to a point;

Thence North 07 deg. 21' 02" West along said centerline of the Mahoning River a distance of 81.79 feet to a point;

Thence North 20 deg. 57' 30" West along said centerline of the Mahoning River a distance of 145.70 feet to a point;

Thence North 39 deg. 38' 16" West along said centerline of the Mahoning River a distance of 98.55 feet to a point;

Thence North 76 deg. 21' 07" West along said centerline of the Mahoning River a distance of 459.57 feet to a point;

Thence North 51 deg. 12' 10" West along said centerline of the Mahoning River a distance of 439.04 feet to a point;

Thence North 21 deg. 07' 52" West along said centerline of the Mahoning River a distance of 162.28 feet to a point;

Thence North 38 deg. 47' 47" West along said centerline of the Mahoning River a distance of 579.04 feet to a point;

Thence North 48 deg. 50' 26" West along said centerline of the Mahoning River, passing over the line dividing Howland Township Section 31 with Warren Township Section 42 a distance of 501.70 feet to a point;

Instr: 201210240028388 10/24/2012
P: 9 of 21 F: \$180.00 1:05PM
Diana Marchese T20120031680
Trumbull County Recorder BX(76) -VRL

Instr: 201512010022766 12/01/2015
P: 19 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024820
Trumbull County Recorder EPBDM STEE

Thence North 43 deg. 36' 24" West along said centerline of the Mahoning River a distance of 574.36 feet to a point;

Thence North 36 deg. 46' 57" West along said centerline of the Mahoning River a distance of 400.10 feet to a point;

Thence North 00 deg. 42' 35" West along said centerline of the Mahoning River a distance of 63.47 feet to a point;

Thence South 84 deg. 59' 27" West, passing over the centerline of South Main Street (Austintown-Warren Road), a distance of 351.56 feet to a point;

Thence South 02 deg. 50' 16" East a distance of 306.42 feet to a point;

Thence South 84 deg. 51' 22" West a distance of 326.48 feet to a point;

Thence South 01 deg. 22' 04" East a distance of 311.64 feet to a point;

Thence South 83 deg. 21' 34" West a distance of 671.53 feet to a point;

Thence South 28 deg. 14' 50" West a distance of 204.03 feet to a point;

Thence South 01 deg. 06' 21" West a distance of 756.70 feet to a point;

Thence South 82 deg. 20' 58" East a distance of 274.02 feet to a point;

Thence South 08 deg. 56' 30" West a distance of 1,042.75 feet to a point;

Thence South 08 deg. 42' 00" West a distance of 55.77 feet to a point on the centerline of Burnett East Road;

Thence North 81 deg. 18' 00" West along said centerline of Burnett East Road a distance of 1,855.99 feet to a point on the line dividing Warren Township Section 42 with Warren Township Section 41;

Thence North 07 deg. 51' 57" East along said line dividing Warren Township Section 42 with Warren Township Section 41 a distance of 2,214.99 feet to a point;

Thence North 80 deg. 33' 01" West, along the Northerly line of land now or formerly owned by M. S. Clapp, a distance of 237.59 feet to a point in the centerline of Highland Avenue (Souptown-Warren Road);

Thence North 19 deg. 39' 03" East along said centerline of Highland Avenue, passing over the line dividing Warren Township Section 41 with Warren Township Section 42, a distance of 1,521.84 feet to a point;

Thence North 18 deg. 56' 59" East along said centerline of Highland Avenue a distance of 752.43 feet to a point at the intersection of said centerline of Highland Avenue with the centerline of Dover Street;

Thence South 81 deg. 13' 41" East along said centerline of Dover Street, and the line dividing Warren Township Section 42 with Warren Township Section 35 a distance of 2,145.30 feet to the place of beginning, containing 650.899 acres of land, more or less.

Being Auditor's Parcel No. _____

EXCEPTING AND RESERVING FROM THE ABOVE DESCRIBED PARCEL THE FOLLOWING TRACT OF LAND:

Instr: 201210240028398 10/24/2012
P: 10 of 21 F: \$180.00 1:08PM
Diana Marchese T20125031880
Trumbull County Recorder BX(76) VAL

Instr: 201512010022766 12/01/2015
P: 20 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024820
Trumbull County Recorder EPBOM STEE

Situated in the State of Ohio; County of Trumbull, Township of Warren, Section 42 and being more fully described as follows:

Commencing at a point at the junction of the centerline of Dover Street with the centerline of South Main Street (Austintown-Warren Road);

Thence South 00 deg. 05' 16" East along said centerline of South Main Street a distance of 438.09 feet to a point, said point being the true place of beginning for the tract to be excepted;

Thence North 89 deg. 54' 44" East a distance of 340.00 feet to a point;

Thence South 14 deg. 39' 21" West a distance of 196.47 feet to a point;

Thence South 89 deg. 54' 44" West a distance of 290.00 feet to a point on the centerline of South Main Street;

Thence North 00 deg. 05' 16" West along said centerline of South Main Street a distance of 190.00 feet to the placing of beginning, containing 1.374 acres of land, more or less.

It is the intent for Parcel B to contain 649.525 acres of land, more or less, of which 3.121 acres of land, more or less, are in the Township of Warren Section 41, 268.720 acres of land, more or less, are in the Township of Warren Section 42, 80.229 acres of land, more or less, are in the Township of Warren Section 35, 28.473 acres of land, more or less, are in the Township of Warren Section 28 City of Warren, 221.309 acres of land, more or less, are in the Township of Warren Section 28 City of Warren, 221.309 acres of land, more or less, are in the Township of Howland Section 31, 0.870 acres of land, more or less, are in the Township of Howland Section 31 City of Warren, and 34.358 acres of land, more or less, are in the Township of Weathersfield Section 10.

The above description is subject to any rights The Pittsburgh, Youngstown, and Ashtabula Railway Company, its successors and assigns, and the Pittsburgh, Cleveland, and Toledo Railroad Company, its successors and assigns, have or ought to have over, through, or across said property

The above description is based on a survey made by Thomas F. Hosure, Registered Surveyor No. 4718 in May, 1988.

The hereinabove described real estate is also subject to all easements, rights of way, licenses, leases, covenants, reservations, restriction, limitations, encumbrances of record and to all matters shown on survey or those matters which an inspection of the Premises would disclose; to zoning ordinances; and to legal highway.

Being Auditor's Parcel No. _____

PARCEL C:

Situated in the Township of Warren, County of Trumbull and State of Ohio:

And known as being situated in the State of Ohio, County of Trumbull, Township of Warren, Section 35 and Section 28, Township of Howland, Section 31, City of Warren, and being more fully described as follows:

Commencing at a point at the junction of the centerline at Burton Street with the centerline of Pine Street (Niles-Warren River Road);

Thence North 16 deg. 22' 39" East along said centerline of Pine Street a distance of 469.15

Instr: 201210240020300 10/24/2012
P: 11 of 21 F: \$100.00 1:00PM
Diana Marchese T20120031060
Trumbull County Recorder BX(76) VSL

Instr: 201512010022755 12/01/2015
P: 21 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20160024820
Trumbull County Recorder EPBDM STEE

feet to a point;

Thence North 30 deg. 30' 51" West along said centerline of Pine Street a distance of 2,183.76 feet to a point;

Thence North 08 deg. 23' 16" West a distance of 79.65 feet to a point on the existing Easterly right of way line of Pine Street and the true place of beginning for the parcel herein described;

Thence North 30 deg. 30' 51" West along said existing Easterly right of way line, passing over the line dividing Howland Township Section 31 with Warren Township Section 35, a distance of 473.61 feet to a point;

Thence North 34 deg. 52' 51" West along said existing Easterly right of way line a distance of 210.82 feet to a point;

Thence North 48 deg. 28' 51" West along said existing Easterly right of way line a distance of 336.95 feet to a point;

Thence North 43 deg. 15' 51" West along said existing Easterly right of way line, passing over the line dividing Warren Township Section 35 with Warren Township Section 28, a distance of 131.73 feet to a point;

Thence North 39 deg. 03' 51" West along said existing Easterly right of way line a distance of 256.42 feet to a point;

Thence North 81 deg. 01' 09" East, along the Southerly line of land now or formerly owned by S. Maskas, a distance of 52.93 feet to a point;

Thence North 09 deg. 26' 51" West, along the Easterly line of land now or formerly owned by S. Maskas, a distance of 61.40 feet to a point on the Southerly line of the George M. Smith Addition No. 3;

Thence South 83 deg. 44' 51" East along said Southerly line of the George M. Smith Addition No. 3 and its Easterly Extension a distance of 670.00 feet to a point;

Thence North 06 deg. 15' 09" East a distance of 150.00 feet to a point;

Thence North 83 deg. 44' 51" West a distance of 165.00 feet to a point;

Thence North 06 deg. 15' 09" East a distance of 50.00 feet to a point;

Thence South 83 deg. 44' 51" East a distance of 30.00 feet to a point;

Thence North 06 deg. 15' 09" East a distance of 150.00 feet to a point;

Thence South 83 deg. 44' 51" East a distance of 127.15 feet to a point;

Thence South 16 deg. 19' 59" East, passing over the line dividing Warren Township Section 23 with Howland Township Section 31, a distance of 590.31 feet to a point;

Thence South 11 deg. 52' 39" East a distance of 80.52 feet to a point on the Westerly right of way line of the Pittsburgh, Youngstown, and Ashtabula Railway Company;

Thence along said Westerly right of way line, parallel to and 33.00 feet Westerly from the centerline of the Westbound main, by a curve to the left having a radius of 1,964.53 feet and an arc length of 809.12 feet, said curve also being defined by a chord having a bearing and distance of South 04 deg. 34' 22" West, 803.41 feet, to the place of beginning,

Instr: 201210240028388 10/24/2012
P: 12 of 21 F: \$180.00 1:08PM
Diana Marchese T20128031860
Trumbull County Recorder BX(78) VRL

Instr: 201512010022766 12/01/2015
P: 22 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024820
Trumbull County Recorder EPBDM STEE

containing 11.688 acres of land, more or less, of which 7.349 acres of land, more or less, are in the Township of Warren Section 28 City of Warren, 3.392 acres of land, more or less, are in the Township of Warren Section 35 City of Warren, and 0.947 acres of land, more or less, are in the Township of Howland Section 31 City of Warren.

The above description is subject to any rights the Pittsburgh, Youngstown, and Ashtabula Railway Company, its successors and assigns, and the Pittsburgh, Cleveland, and Toledo Railroad Company, its successors and assigns, have or ought to have over, through, or across said property.

The above description is based on a survey made by Thomas F. Mosure, Registered Surveyor No. 4718 in May, 1988.

The hereinabove described real estate is also subject to all easements, rights of way, licenses, leases, covenants, reservations, restrictions, limitations, encumbrances of record and to all matters shown on survey or those matters which an inspection of the Premises would disclose; to zoning ordinances; and to legal highways.

Being Auditor's Parcel No. _____.

PARCEL D

Situated in the Township of Warren, County of Trumbull and State of Ohio:

And known as being situated in the State of Ohio, County of Trumbull, Township of Howland, Section 34, City of Warren and being more fully described as follows:

Commencing at a point at the junction of the centerline of Pine Street (Niles-Warren River Road) with the centerline of Burton Street;

Thence North 82 deg. 00' 04" West a distance of 30.32 feet to a point on the existing Westerly right of way line of Pine Street, and the true place of beginning for the parcel herein described;

Thence South 16 deg 22' 39" West along said existing Westerly right of way line a distance of 105.36 feet to a point;

Thence South 15 deg. 43' 45" West along said existing Westerly right of way line a distance of 61.42 feet to a point;

Thence along said existing Westerly right of way line by a curve to the left having a radius of 2,894.79 feet and an arc length of 364.62 feet, said curve also being defined by a chord having a bearing and distance of South 12 deg. 07' 15" West, 364.38 feet, to a point;

Thence South 08 deg 30' 45" West along said existing Westerly right of way line a distance of 214.77 feet to a point;

Thence along said existing Westerly right of way line by a curve to the left having a radius of 984.93 feet and an arc length of 153.86 feet, said curve also being defined by a chord having a bearing and distance of South 04 deg. 02' 15" West, 153.71 feet, to a point;

Thence South 00 deg. 26' 15" East along said existing Westerly right of way line a distance of 560.25 feet to a point;

Thence along said existing Westerly right of way line by a curve to the left having a radius of 1,939.86 feet and an arc length of 315.51 feet, said curve also being defined by a chord having a bearing and distance of South 05 deg. 05' 50" East, 315.16 feet, to a point;

Instr: 201210240026388 10/24/2012
P: 13 of 21 F: \$180.00 1:05PM
Diana Marchese T20120031680
Trumbull County Recorder 8X1761 VRL

Instr: 201512010022766 12/01/2015
P: 23 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024820
Trumbull County Recorder EPBDM STEE

Thence South 09 deg. 45' 24" East along said existing Westerly right of way line a distance of 296.83 feet to a point on the Easterly right of way line of the Pittsburgh, Youngstown and Ashtabula Railway Company;

Thence along said Easterly right of way line by a curve to the right having a radius of 3,272.65 feet and an arc length of 502.85 feet, said curve also being defined by a chord having a bearing and distance of North 14 deg. 15' 18" West, 502.35 feet, to a point;

Thence North 09 deg. 51' 17" West along said Easterly right of way line, parallel to and 33.00 feet Easterly from the centerline of the Westbound main, a distance of 3,705.44 feet to a point on the existing Westerly right of way line of Pine Street;

Thence South 30 deg 30' 51" East along said existing Westerly right of way line a distance of 1,911.66 feet to a point;

Thence South 16 deg 22' 39" West along said existing Westerly right of way line a distance of 460.55 feet to the place of beginning, containing 26.827 acres of land, more or less, of which 6.182 acres of land, more or less, are in the Township of Howland Section 31 and 20.645 acres of land, more or less, are in the Township of Howland Section 31 City of Warren.

The above description is subject to any right the Pittsburgh, Youngstown, and Ashtabula Railway Company, its successors and assigns, and the Pittsburgh, Cleveland, and Toledo Railroad Company, its successors and assigns, have or ought to have over, through or across said property.

The above description is based on a survey made by Thomas F. Mosure, Registered Surveyor No. 4718 in May, 1988.

The hereinabove described real estate is also subject to all easements, rights of way, licenses, leases, covenants, reservations, restrictions, limitations, encumbrances of record and to all matters shown on survey or those matters which an inspection of the Premises would disclose; to zoning ordinances; and to legal highways.

Being Auditor's Parcel No. _____.

PARCEL E:

Situated in the Township of Warren, County of Trumbull and State of Ohio:

And known as being situated in the State of Ohio, County of Trumbull, Township of Howland, Section 31, and being more fully described as follows:

Commencing at a point at the junction of the centerline of South Main Street (Niles-Warren River Road) with the centerline of Deforest-Townline Road, said point also being on the line dividing Howland Township Section 31 with Weathersfield Township Section 10;

Thence North 80 deg. 57' 54" West along said line dividing Howland Township Section 31 with Weathersfield Township Section 10 and the centerline of Deforest-Townline Road extended Westerly, a distance of 52.84 feet to a point, and the true place of beginning for the parcel herein described;

Thence continuing North 80 deg. 57' 54" West along said line dividing Howland Township Section 31 with Weathersfield Township Section 10 a distance of 195.54 feet to a point on the Easterly right of way line of the Pittsburgh, Youngstown, and Ashtabula Railway Company;

Instr: 201210240020388 12/24/2012
P: 14 of 21 F: \$100.00 1:05PM
Diana Marchese T20120031680
Trumbull County Recorder 8X(78) VRL

Instr: 201512010022766 12/01/2015
P: 24 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20160024820
Trumbull County Recorder EPBDM STEE

Thence North 18 deg. 15' 24" West along said Easterly right of way line, parallel to and 242.00 feet Easterly from the centerline of the Westbound main, a distance of 233.80 feet to a point on the existing Westerly right of way line of Pine Street.

Thence along said existing Westerly right of way line by a curve to the left having a radius of 1,667.28 feet and an arc length of 53.00 feet, said curve also being defined by a chord having a bearing and distance of South 45 deg. 41' 46" East, 52.99 feet to a point;

Thence South 46 deg. 36' 24" East along said existing Westerly right of way line a distance of 268.63 feet to a point;

Thence along said existing Westerly right of way line by a curve to the left having a radius of 5,759.58 feet and an arc length of 45.56 feet, said curve also being defined by a chord having a bearing and distance of South 46 deg. 50' 00" East 45.56 feet, to the place of beginning, containing 0.462 acres of land, more or less, all of which is in the Township of Howland, Section 31.

The above description is subject to any rights The Pittsburgh, Youngstown, and Ashtabula Railway Company, its successors and assigns, and the Pittsburgh, Cleveland, and Toledo Railroad Company, its successors and assigns, have or ought to have over, through, or across said property.

The above description is based on a survey made by Thomas F. Mosure, Registered Surveyor No. 4718 in May, 1988.

The hereinabove described real estate is also subject to all easements, rights of way, licenses, leases, covenants, reservations, restrictions, limitations, encumbrances of record and to all matters shown on survey or those matters which an inspection of the Premises would disclose; to zoning ordinances; and to legal highways.

Being Auditor's Parcel No. _____

PARCEL F:

Situated in the Township of Warren, County of Trumbull and State of Ohio:

And known as being situated in the State of Ohio, County of Trumbull, Township of Howland, Section 31, Township of Weathersfield, Section 10, and being more fully described as follows:

Commencing at a point at the junction of the centerline of Pine Street (Niles-Warren River Road) with the centerline of Deforest-Townline Road;

Thence South 80 deg. 57' 54" East along said centerline of Deforest-Townline Road a distance of 56.01 feet to a point, and the true place of beginning for the parcel herein described;

Thence along the existing Easterly right of way line of Pine Street and its Southerly Extension, by a curve to the right having a radius of 5,699.58 feet and an arc length of 135.43 feet, said curve also being defined by a chord having a bearing and distance of North 47 deg. 17' 14" West, 135.42 feet to a point;

Thence North 46 deg. 36' 24" West along said existing Easterly right of way line a distance of 268.63 feet to a point;

Thence along said existing Easterly right of way line by a curve to the right having a radius of 1,607.28 feet and an arc length of 795.29 feet, said curve also being defined by a chord having a bearing and distance of North 32 deg. 25' 54" West, 787.20 feet to a point;

Instr: 201512010022766 12/01/2015
P: 25 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024820
Trumbull County Recorder EPBDM STEE

Instr: 201512010022766 12/01/2015
P: 25 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024820
Trumbull County Recorder EPBDM STEE

Thence North 18 deg. 15' 24" West along said existing Easterly right of way line a distance of 1,099.84 feet to a point;

Thence along said existing Easterly right of way line by a curve to the right having a radius of 5,601.60 feet and an arc length of 831.01 feet, said curve also being defined by a chord having a bearing and distance of North 14 deg. 00' 24" West, 830.25 feet, to a point;

Thence North 09 deg. 45' 24" West along said existing Easterly right of way line a distance of 1,767.68 feet to a point;

Thence along said existing Easterly right of way line by a curve to the right having a radius of 1,879.86 feet and an arc length of 305.59 feet, said curve also being defined by a chord having a bearing and distance of North 05 deg. 05' 50" West, 305.25 feet to a point;

Thence North 00 deg. 26' 15" West along said existing Easterly right of way line a distance of 560.25 feet to a point;

Thence along said existing Easterly right of way line by a curve to the right having a radius of 924.93 feet and an arc length of 144.49 feet, said curve also being defined by a chord having a bearing and distance of North 04 deg. 02' 15" East, 144.34 feet, to a point;

Thence North 08 deg. 30' 45" East along said existing Easterly right of way line a distance of 214.77 feet to a point;

Thence along said existing Easterly right of way line by a curve to the right having a radius of 2,834.79 feet and an arc length of 357.06 feet, said curve also being defined by a chord having a bearing and distance of North 12 deg. 07' 15" East, 356.83 feet, to a point;

Thence North 15 deg. 43' 45" East along said existing Easterly right of way line a distance of 61.08 feet to a point;

Thence North 16 deg. 22' 39" East along said existing Easterly right of way line a distance of 93.64 feet to a point on the existing Southerly right of way line of Burton Street;

Thence South 82 deg. 00' 04" East along said existing Southerly right of way line of Burton Street a distance of 982.55 feet to a point;

Thence South 07 deg. 59' 56" West along the Westerly line of land now or formerly owned by Robert Cochran a distance of 194.00 feet to a point;

Thence South 82 deg. 00' 04" East along the Southerly line of land now or formerly owned by Robert Cochran a distance of 379.68 feet to a point on the Westerly right of way line of the Pittsburgh, Cleveland, and Toledo Railroad Company;

Thence South 19 deg. 52' 33" East along said Westerly right of way line, parallel to and 50.00 feet Westerly from the centerline of said railroad, a distance of 5,379.42 feet to a point;

Thence North 80 deg. 57' 54" West along the Northerly line of land now or formerly owned by the Pittsburgh, Cleveland and Toledo Railroad Company a distance of 594.31 feet to a point;

Thence South 09 deg. 02' 06" West along the Westerly line of land now or formerly owned by the Pittsburgh, Cleveland, and Toledo Railroad Company a distance of 1,070.33 feet to a point on the centerline of Deforest Townline Road;

Instr: 201210240026368 10/24/2012
P: 16 of 21 F: \$160.00 1:05PM
Diana Marchese T20120031680
Trumbull County Recorder DX(76) VRL

Instr: 201512010022766 12/01/2015
P: 26 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024620
Trumbull County Recorder EPBDM STEE

Thence North 80 deg. 57' 54" West along said centerline of Deforest Townline Road and the line dividing Howland Township Section 31 with Weathersfield Township Section 10 a distance of 157.17 feet to a point on the Easterly line of a 66.00 foot strip of land now owned by LTV Steel Company, Inc. and formerly owned by the Pittsburgh, Youngstown, and Ashtabula Railway Company;

Thence South 29 deg. 02' 54" East along said Easterly line of said 66.00 foot strip a distance of 1,334.53 feet to a point;

Thence South 80 deg. 40' 53" East a distance of 1,045.82 feet to a point;

Thence South 08 deg. 12' 04" West a distance of 770.35 feet to a point;

Thence South 81 deg. 35' 28" East a distance of 456.40 feet to a point on the Westerly right of way line of the Pittsburgh, Cleveland, and Toledo Railroad Company;

Thence South 26 deg. 45' 05" East along said Westerly right of way line of the Pittsburgh, Cleveland and Toledo Railroad Company a distance of 325.68 feet to a point on the Northerly line of land now or formerly owned by Reactive Metals Inc.;

Thence North 81 deg. 38' 07" West along said Northerly line of land now or formerly owned by Reactive Metals Inc. a distance of 958.09 feet to a point on the Westerly line of a 66.00 foot strip of land now owned by LTV Steel Company, Inc. and formerly owned by the Pittsburgh, Youngstown, and Ashtabula Railway Company;

Thence North 29 deg. 02' 54" West along said Westerly line of said 66.00 foot strip and the Easterly line of land now or formerly owned by Reactive Metals Inc., J. W. Malone, Bishop of the Diocese of Youngstown, Ohio Edison Co., and D. V. Seybert, passing over the centerline of Deforest Townline Road and the line dividing Weathersfield Township Section 10 with Howland Township Section 31, a distance of 2,955.23 feet to a point on the Northerly line of land now or formerly owned by D. V. Seybert;

Thence South 09 deg. 02' 06" West along said Northerly line of land now or formerly owned by D. V. Seybert a distance of 79.70 feet to a point;

Thence North 80 deg. 57' 34" West along the Northerly line of land now or formerly owned by D. V. Seybert and George Boyce a distance of 100.00 feet to a point;

Thence North 09 deg. 02' 06" East along the Northerly line of land now or formerly owned by George Boyce a distance of 30.00 feet to a point;

Thence North 80 deg. 57' 54" West along the Northerly line of land now or formerly owned by George Boyce a distance of 50.00 feet to a point on the Westerly line of land now or formerly owned by George Boyce;

Thence South 09 deg. 02' 06" West along said Westerly line of land now or formerly owned by George Boyce, a distance of 180.00 feet to a point on the centerline of Deforest Townline Road and the line dividing Howland Township Section 31 with Weathersfield Township Section 10;

Thence North 80 deg. 57' 54" West along said centerline of Deforest Townline Road and the line dividing Howland Township Section 31 with Weathersfield Township Section 10 a distance of 403.44 feet to the place of beginning, containing 300.436 acres of land, more or less, of which 4.170 acres of land, more or less, are in the Township of Howland Section 31 City of Warren, 273.223 acres of land, more or less, are in the Township of Howland Section 31, and 22.775 acres of land, more or less, are in the Township of Weathersfield Section 10.

Instr: 201210240026308 10/24/2012
P: 17 of 21 F: \$180.00 1:05PM
Diana Marchese T20120031660
Trumbull County Recorder 8X(78) VAL

Instr: 201512010022755 12/01/2015
P: 27 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024920
Trumbull County Recorder EPBDM STEE

The above description is subject to any rights The Pittsburgh, Youngstown, and Ashtabula Railway Company, its successors and assigns, and the Pittsburgh, Cleveland, and Toledo Railroad Company, its successors and assigns, have or ought to have over, through, or across said property.

The above description is based on a survey made by Thomas F. Mosure, Registered Surveyor No. 4718 in May, 1988.

The hereinabove described real estate is also subject to all easements, rights of way, licenses, leases, covenants, reservations, restrictions, limitations, encumbrances of record and to all matters shown on survey or those matters which an inspection of the Premises would disclose; to zoning ordinances; and to legal highways.

Being Auditor's Parcel No. _____.

EXCEPTING THEREFROM PARCEL F THE FOLLOWING DESCRIBED TRACT OF LAND:

Situated partly in the City of Warren and also in the Township of Howland, Section 31, County of Trumbull, State of Ohio, and being known as part of the Warren Consolidated Industries, Inc. properties, and being more fully bounded and described as follows:

Beginning at a point where the Easterly right of way of Niles-Warren River Road intersects with the Southerly right of way line of Burton Street (a 40.00-foot road);

Thence South 82 deg. 00' 04" East along said Southerly right of way of Burton Street a distance of 922.55 feet to an iron pin, said pin being the true place of beginning;

Thence South 7 deg. 59' 56" West a distance of 594.00 feet to an iron pin;

82 deg. 00' 04" East a distance of 651.24 feet to an iron pin, said pin being on the Westerly right of way of the Baltimore and Ohio Railroad Company;

Thence North 19 deg. 52' 33" West along said right of way a distance of 452.50 feet to an iron pin, said pin being on the said right of way of the Baltimore and Ohio Railroad Company and its intersection with the Southerly property line of a parcel of land now or formerly owned by Robert Cochran;

Thence North 82 deg. 00' 04" West along said property line a distance of 379.68 feet to an iron pin;

Thence North 7 deg. 59' 56" East along the Westerly property line of said Cochran Parcel a distance of 194.00 feet to an iron pin, said pin being on the Southerly right of way of Burton Street;

Thence North 82 deg. 00' 04" West along said right of way a distance of 60.00 feet to an iron pin, said pin being the true place of beginning and containing 5.276 acres of land (0.267 acre within the City of Warren and 5.009 acres within the Township of Howland), however, subject to all legal highways; as surveyed by Richard A. Marsico, Registered Surveyor No. 5510 in October 1989.

EXCEPT restrictions and easements of record, zoning ordinances, taxes and assessments which shall be prorated as of the date of deed recording.

After the above exception Parcel F contains a total of 295.160 acres of land, more or less, (of which 268.215 acres are Township of Howland, Section 31, and 4.170 acres are in Township of Howland, Section 31, City of Warren, and 22.775 acres are in Township of Weathersfield, Section 10).

Instr: 201210240026388 10/24/2012
P: 18 of 21 F: \$180.00 1:06PM
Diana Marchese T20120031660
Trumbull County Recorder BK(76) VRL

Instr: 201512010022766 12/01/2015
P: 28 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150824820
Trumbull County Recorder EPBDM STEE

Being Auditor's Parcel No. _____.

PARCEL G:

Situated in the Township of Warren, County of Trumbull and State of Ohio:

And known as being all that certain piece or parcel of land described as follows:

Commencing at a point at the junction of the centerline of South Main Street (Niles-Warren River Road) with the centerline of Deforest-Townline Road, said point also being on the line dividing Howland Township Section 31 with Weathersfield Township Section 10;

Thence North 80 deg. 57' 54" West along said line dividing Howland Township Section 31 with Weathersfield Township Section 10 and the centerline of Deforest-Townline Road extended Westerly, a distance of 648.95 feet to a point on the Westerly right of way line of Consolidated Rail Corporation, formerly the Pittsburgh, Youngstown, and Ashtabula Railway Company, and the true place of beginning for the parcel herein described;

Thence continuing North 80 deg. 57' 54" West along said line dividing Howland Township Section 31 with Weathersfield Township Section 10 and said Westerly right of way line, a distance of 162.04 feet to a point;

Thence North 18 deg. 15' 24" West, along said Westerly right of way line, parallel to and 258.00 feet Westerly from the centerline of the Westbound main, a distance of 1,204.40 feet to a point;

Thence South 80 deg. 57' 54" East, along said Westerly right of way line, a distance of 162.04 feet to a point;

Thence South 18 deg. 15' 24" East, parallel to and 114.00 feet Westerly from the centerline of the Westbound main, a distance of 1,204.40 feet, to the placing of beginning.

Containing 3.982 acres of land, more or less, all of which is the Township of Howland, Section 31.

Being Auditor's Parcel No. _____.

Instr: 20121024026388 10/24/2012
Pg 19 of 21 F: \$160.00 11:06PM
Diana Marchese T20120031850
Trumbull County Recorder BX(76) VRL

Instr: 201512010022765 12/01/2015
Pg 29 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024820
Trumbull County Recorder EPBDM STEE

PARCEL H:

Situated in the Township of Warren, County of Trumbull and State of Ohio:

And known as being a part of Outlot 26, Part of Block 12 in South Warren Plat and all of George M. Smith's Third Addition as recorded in County Plat Volume 8 at Page 69, being more fully described as follows:

Beginning at an iron pin in the East line of Pine Avenue, Southeast, and at the Southwest corner of Parcel H, said point being the place of beginning;

Thence Northerly along the East right of way line of Pine Avenue, Southeast, North 39 deg. 03' 52" West, for a distance of 15.16 feet to a point;

Thence continuing along said right of way line North 30 deg. 35' 51" West, for a distance of 197.54 feet to a point;

Thence continuing along said right of way line North 18 deg. 45' 41" West, for a distance of 270.10 feet to a point;

Thence continuing along said right of way line North 14 deg. 11' 51" West, for a distance of 10.16 feet to a point;

Thence leaving said right of way line South 83 deg. 44' 51" East and along the North line of George M. Smith's Third Addition and the North line of Outlot 26, for a distance of 816.46 feet to a point;

Thence leaving said North line South 06 deg. 15' 09" West and along the East line of Parcel H, for a distance of 150.00 feet to a point;

Thence continuing along said Easterly line North 83 deg. 44' 51" West, for a distance of 30.00 feet to a point;

Thence continuing along said East line South 06 deg. 15' 09" West, for a distance of 50.00 feet to a point;

Thence continuing along said East line South 83 deg. 44' 51" East, for a distance of 165.00 feet to a point;

Thence continuing along said East line South 06 deg. 15' 09" West, for a distance of 150.00 feet to a point on the Southerly line of Parcel H;

Thence along said Southerly line of Parcel H North 83 deg. 44' 51" West, for a distance of 670.00 feet to a point;

Thence continuing along said Southerly line South 09 deg. 26' 51" East, for a distance of 61.40 feet to a point;

Thence continuing along said Southerly line South 81 deg. 01' 09" West, for a distance of 52.93 feet to the place of beginning, and containing 6.428 acres of land, more or less.

Being Auditor's Parcel No. _____

Prior Dead Reference: Instrument No. 200605010012251 and Instrument No. 200605010012251 of the Records of Trumbull County, Ohio.

Instr: 201210740026389 10/24/2012
P: 20 of 21 F: \$180.00 1:00PM
Diana Marchese T2012001660
Trumbull County Recorder (BX170) VRL

Instr: 201512010022766 12/01/2015
P: 30 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024820
Trumbull County Recorder EPBDM STEE

This Deed is made and delivered pursuant to an Order dated August 22, 2012, of the United States Bankruptcy Court for the District of Delaware in the matter of *In re: WP Steel Venture LLC, et al., Debtors*, (Case No. 12-11661(KJC)).

EXECUTED and acknowledged this ____ day of ____, 2012, by
RICHARD D. CARUSO, CFO, RG STEEL WARREN, LLC, a
Delaware Limited Liability Company.

RG STEEL WARREN, LLC,
a Delaware Limited Liability Company

By *Richard D. Caruso*
Its CFO

STATE OF Delaware,
COUNTY OF New Castle, TO-WIT:

Before me, a Notary Public in and for said County and State, personally appeared the above named Richard D. Caruso, CFO, RG Steel Warren, LLC, who acknowledged that he did sign the foregoing Quitclaim Deed and that the same is his free act and deed as CFO for RG Steel Warren, LLC.

In Testimony Whereof, I have hereunto set my hand and official seal, at Wilmington, DE, this 23rd day of August, 2012.

Mary C. Hall
Notary Public
My Commission Expires: 6-25-2015



THIS INSTRUMENT PREPARED WITHOUT TITLE EXAMINATION BY:

Charles J. Kaiser, Jr., Esq.
Robert D. Plumby, Esq.
PHILLIPS, GARDILL, KAISER & ALTMAYER, PLLC
61 Fourteenth Street
Wheeling, WV 26003

Instr: 201210240026389 10/24/2012
P: 21 of 21 F: \$160.00 1:05PM
Diana Marchese T20120031650
Trumbull County Recorder BX(76) VOL

Instr: 201512010022756 12/01/2015
P: 31 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024820
Trumbull County Recorder EPBDM STEE

TAX PARCEL NOS.

Lordstown Spur

45-193100
45-193200
45-193205
45-193210
45-193215
45-193220
45-193225
45-193230

Parcel B

28-694800
43-312900
43-313400
41-645000
43-313500
43-313700
39-543400
39-543650
29-000500
41-644800
21-900922
39-569252
38-848000

Parcel C

39-543700
38-864140

Parcel D

38-848200
29-000450
29-001108

Parcel E

28-901341

Parcel F

38-848600
28-901340
21-155130

Parcel G

28-901850

Parcel H

39-003086
39-543450



Instr: 201512010022766 12/01/2015
P: 32 of 39 F: S324.00 11:42AM, AGR,
Diana Marchese T20150024820
Trumbull County Recorder ERBDM: STEE

Exhibit B

Survey Pond 5 Area

Instr: 201512010022765 12/01/2015
P: 33 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024820
Trumbull County Recorder EPBDM STEE

POND 5 AREA

Situated in the City of Warren, County of Trumbull and State of Ohio, and known as being part of a 268.720 acre tract of land known as Parcel "B", as conveyed to BDM Warren Steel Holdings LLC by instrument of record in Instrument No. 201210240026388 of the Trumbull County Recorder's office, and being located in Section 42 of Warren Township, and being more fully described as follows:

Commencing at the intersection of the northerly line of Section 42 and the southerly line of Section 35 with the centerline of South Main Street (66' Wide), said point also being the intersection of said South Main Street with the centerline of Dover Street (50' Wide);

Thence N89°07'00"E along the line between Section 35 and Section 42, for a distance of 1056.45 feet to a point;

Thence S00°53'00"E, and being perpendicular to the previous course, for a distance of 103.44 feet to a point, said point being the **TRUE PLACE OF BEGINNING** of the Pond 5 Area described herein;

Thence S42°57'42"E along the Pond 5 Area, for a distance of 396.08 feet to a point on the edge of a plant road;

Thence along the Pond 5 Area and along the edge of the plant road by the following six (6) courses and distances;

- 1.) Thence S54°33'06"W, for a distance of 53.34 feet to a point;
- 2.) By the arc of a curve to the right having a radius of 250.00 feet, a chord bearing of S59°44'20"W and a chord length of 45.20 feet, for an arc distance of 45.27 feet to a point;
- 3.) Thence S64°55'33"W, for a distance of 77.50 feet to a point;
- 4.) By the arc of a curve to the right having a radius of 250.00 feet, a chord bearing of S76°16'32"W and a chord length of 98.40 feet, for an arc distance of 99.04 feet to a point;;
- 5.) Thence S87°37'30"W, for a distance of 75.46 feet to a point;
- 6.) By the arc of a curve to the right having a radius of 252.91 feet, a chord bearing of N86°28'44"W and a chord length of 51.08 feet, for an arc distance of 51.17 feet to a point;

Thence leaving the edge of the plant road and continuing along the Pond 5 Area, S51°46'52"W for a distance of 78.04' to a point;

Instr: 201512010022766 12/01/2015
P: 34 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024820
Trumbull County Recorder EPBDM STEE

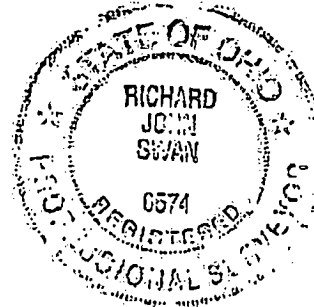
Thence N58°05'13"W and continuing along the Pond 5 Area, for a distance of 309.42 feet to a point;

Thence N56°27'31"W and continuing along the Pond 5 Area, for a distance of 514.86 feet to the **TRUE PLACE OF BEGINNING** and containing within said bounds 161,927.4 square feet or 3.717 Acres of land more or less.

North for the above description is based on the Ohio State Plane Coordinate System, North Zone NAD83/2011.

The above description was prepared by Richard John Swan, Registered Professional Surveyor No. 6574 of **ms consultants, inc.**, in September 2015, and is based on a survey made by **ms consultants, inc.** in September 2015.

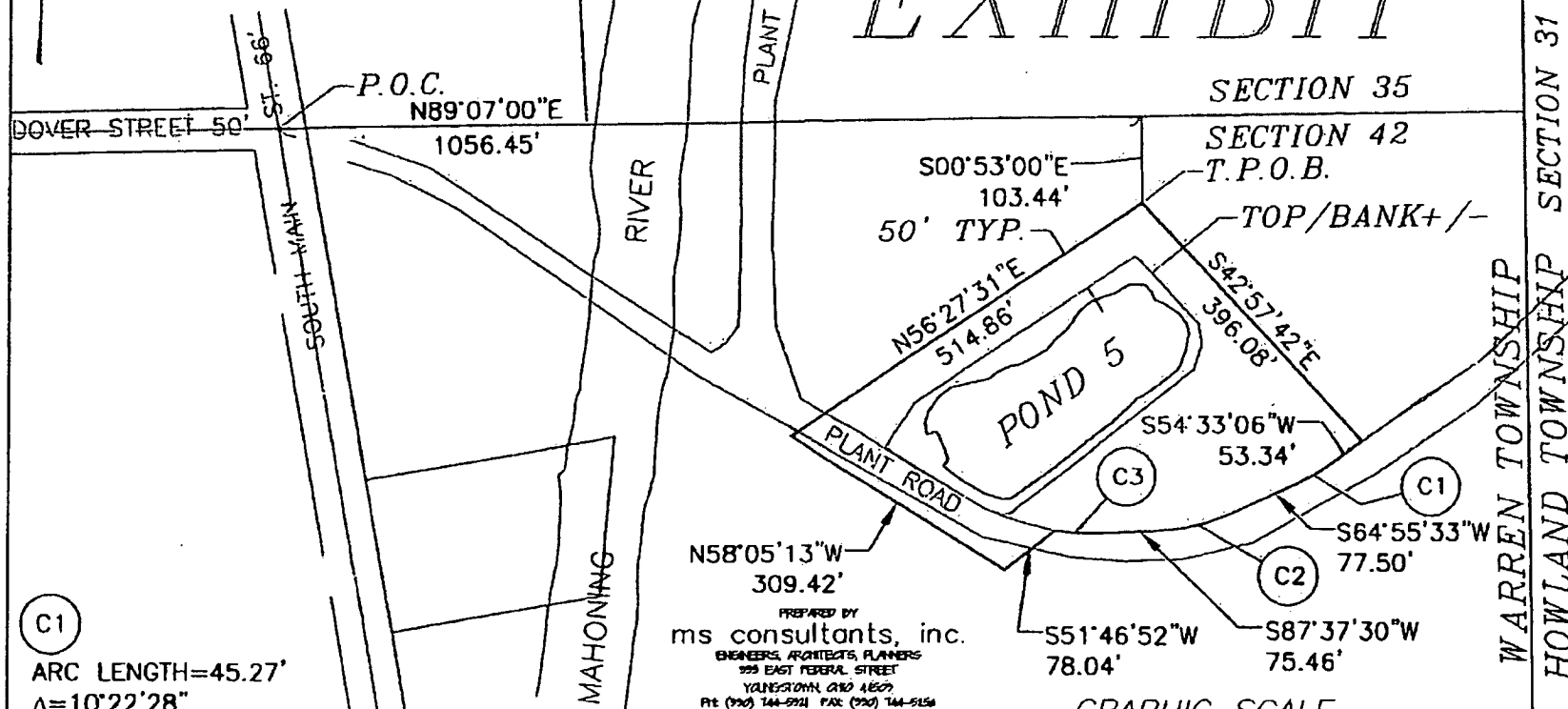
Richard J. Swan
9/25/15



BASIS OF BEARINGS

NORTH IS BASED ON THE OHIO STATE
PLANE COORDINATE SYSTEM NORTH
ZONE NAD83/2011

POND 5 EXHIBIT



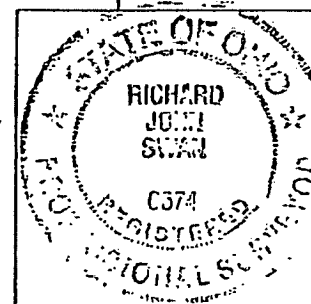
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ARC LENGTH=45.27'
Δ=10°22'28"
RADIUS=250.00'
TANGENT=22.70'
CHORD BEARING=S59°44'20"W
CHORD LENGTH=45.20'

C2
ARC LENGTH=99.04'
Δ=22°41'57"
RADIUS=250.00'
TANGENT=50.18'
CHORD BEARING=S76°16'32"W
CHORD LENGTH=98.40'

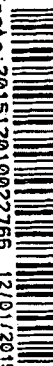
C3
ARC LENGTH=51.17'
Δ=11°35'32"
RADIUS=252.91'
TANGENT=25.67'
CHORD BEARING=N86°28'44"W
CHORD LENGTH=51.08'

I HEREBY CERTIFY THAT,
TO THE BEST OF MY KNOWLEDGE AND BELIEF,
THIS PLAT IS A TRUE DELINEATION OF A SURVEY
MADE BY ms consultants, inc. IN SEPT. 2015.

Richard John Swan 9/25/15
RICHARD JOHN SWAN
REGISTERED PROFESSIONAL SURVEYOR No. 6574



Inst. 201512010022765 12/01/2015
P.35 of 39 F.5324.00 11:42AM ACR
Diana Marchese 120150024870
Trumbull County Recorder EPB011 STEE





Instr: 201512010022765 12/01/2015
P: 36 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024820
Trumbull County Recorder EPBOM STEE

Exhibit C

Survey Pond 56 Area



Instr: 201512010022765 12/01/2015
P: 37 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024820
Trumbull County Recorder EPBDM STEE

POND 56 AREA

Situated in the City of Warren, County of Trumbull and State of Ohio, and known as being part of a 268.720 acre tract of land known as Parcel "B", as conveyed to BDM Warren Steel Holdings LLC by instrument of record in Instrument No. 201210240026388 of the Trumbull County Recorder's office, and being located in Section 35 of Warren Township and Section 31 in Howland Township, and being more fully described as follows:

Commencing at the intersection of the northerly line of Section 42 and the southerly line of Section 35 in Warren Township with the centerline of South Main Street (66' Wide), said point also being the intersection of said South Main Street with the centerline of Dover Street (50' Wide;

Thence N89°07'00"E along the line between Section 35 and Section 42, for a distance of 1525.60 feet to a point, said point being the northeasterly corner of said Section 42 and the southeasterly corner of said Section 35, and being on the westerly line of Section 31 in Howland Township;

Thence N01°04'29"W, along the easterly line of Section 35 in Warren Township and the westerly line of Section 31 in Howland Township, for a distance of 836.17 feet to a point, said point being the **TRUE PLACE OF BEGINNING** of the Pond 56 Area described herein;

Thence S32°35'05"E along the Pond 56 Area, for a distance of 162.55 feet to a point;

Thence continuing along the Pond 56 Area and by the following six (6) courses and distances;

- 1.) Thence N86°39'21"E, for a distance of 306.78 feet to a point;
- 2.) Thence N23°28'01"E, for a distance of 103.83 feet to a point;
- 3.) Thence N33°42'44"W, for a distance of 552.07 feet to a point;
- 4.) Thence N80°48'26"W, for a distance of 95.73 feet to a point;
- 5.) Thence S53°22'58"W, for a distance of 91.56 feet to a point;
- 6.) Thence S11°04'22"W, for a distance of 261.07 feet to a point;

Thence S32°35'05"E and continuing along the Pond 56 Area, for a distance of 166.01 feet to the **TRUE PLACE OF BEGINNING** and containing within said bounds 191,380.1 square feet or 4.393 Acres of land more or less, and being 21,635.6 square feet or 0.497 acres of land, more or less in Section 35 in Warren Township, and 169,744.5 square feet or 3.896 acres of land, more or less in Section 31 in Howland Township.

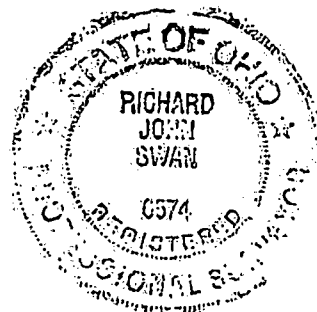


Instr.: 201512010022766 12/01/2015
P. 38 of 39 F: \$324.00 11:42AM AGR
Diana Marchese T20150024820
Trumbull County Recorder EPBDH STEE

North for the above description is based on the Ohio State Plane Coordinate System, North Zone NAD83/2011.

The above description was prepared by Richard John Swan, Registered Professional Surveyor No. 6574 of **ms consultants, inc.**, in September 2015, and is based on a survey made by **ms consultants, inc.** in September 2015.

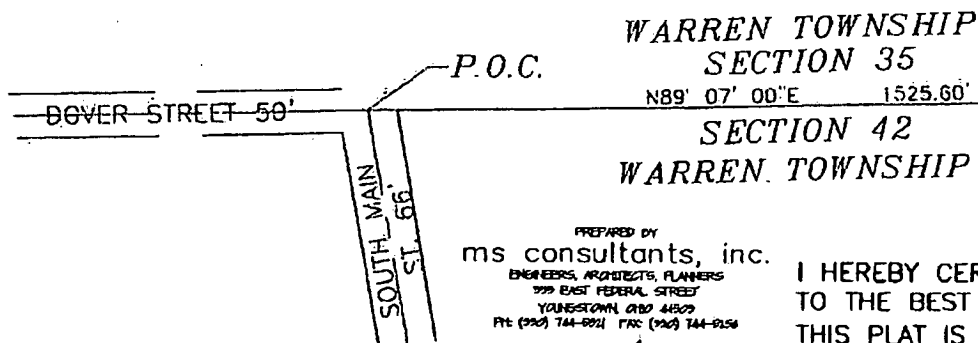
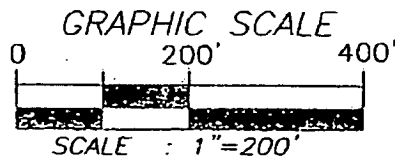
Richard John Swan
9/25/15



POND 56 EXHIBIT

BASIS OF BEARINGS

NORTH IS BASED ON THE OHIO STATE
PLANE COORDINATE SYSTEM NORTH
ZONE NAD83/2011



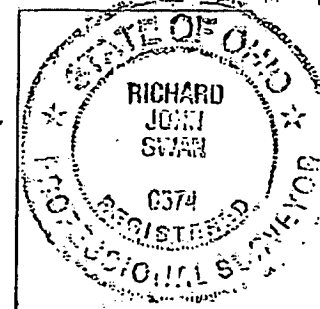
PREPARED BY
ms consultants, inc.
ENGINEERS, ARCHITECTS, PLANNERS
799 EAST FEDERAL STREET
YOUNGSTOWN, OHIO 44607
PH (330) 744-6921 FAX (330) 744-9154



SEPT. 15/15
11-24000-00

I HEREBY CERTIFY THAT,
TO THE BEST OF MY KNOWLEDGE AND BELIEF,
THIS PLAT IS A TRUE DELINEATION OF A SURVEY
MADE BY ms consultants, inc. IN SEPT. 2015.

Richard John Swan 9/25/15
RICHARD JOHN SWAN
REGISTERED PROFESSIONAL SURVEYOR No. 6574



INSTR. 201512010022766 12/01/2015
P. 39 of 39 F. 5324.00 11:42AM AGR
Diana Marchese
Trumbull County Recorder EPBDM STE

