

EVRAZ EVRAZ INC. NA

cc Janyloshel
cc EVRAZ CLAYMONT STEEL

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31 December 2008

Mr. John A. Hughes, Secretary
Delaware Department of Natural Resources and Environmental Control
89 Kings Highway
Dover, DE 19901

Subject: Secretary's Order 2006-A-0058

Dear Secretary Hughes:

Evrax Claymont Steel, Inc (Evrax Claymont Steel) is providing the Semi-Annual Mercury Source Reduction Report per the Secretary's Order 2006-A-0058.

If you have any questions concerning this matter, please contact me at 302.792.5444.

Sincerely,



David A. Wagner
Environmental Consultant

Semi-Annual Mercury Source Reduction Report

**Submitted By:
Evraz Claymont Steel
4001 Philadelphia Pike
Claymont, DE 19703**

**Submitted to:
Delaware Department of Natural Resources and Environmental
Control
89 Kings Highway
Dover, DE 19901**

31 December 2008

Introduction

Secretary's Order No. 2006-A-0058 (the "Order") relates to the Claymont Steel steelmaking facility in Claymont, Delaware. The Order states, among other things, that the facility shall design and implement an enhanced mercury pollution prevention plan ("PPP") no later than December 31, 2008. In accordance with that provision, Evraz Claymont Steel ("ECS") submitted to the Department on January 31, 2007, a document entitled *Response to Notice of Conciliation and Secretary's Order No. 2006-A-0058 & Mercury Pollution Prevention Plan*. That document included an enhanced mercury PPP focused primarily upon purchasing motor vehicle scrap from scrap providers who participate in the National Vehicle Mercury Switch Removal Program ("NVMSRP") and other related action items to be followed until the NVMSRP became functional and effective.

The Order also states that the facility shall submit to the Department semiannual reports, describing the facility's progress during the most recent semiannual period toward implementation of the enhanced mercury PPP. In accordance with the Order, the facility previously submitted to the Department three semi-annual reports detailing the progress ECS made during the reporting period in implementing the January 2007 PPP. This submittal constitutes ECS' semiannual report for the period of July 1 through December 31, 2008.

On December 28, 2007, the United States Environmental Protection Agency ("EPA") promulgated the "National Emission Standards for Hazardous Air Pollutants for Area Sources: Electric Arc Furnace Steelmaking Facilities" at 40 C.F.R. Part 63, Subpart YYYYY (40 C.F.R. §§ 63.10680 – 63.10692) ("Subpart YYYYY"). Subpart YYYYY reflects, at 40 C.F.R. § 63.10685(b), EPA's determination that a facility's participation in an EPA-approved source reduction program for motor vehicle scrap constitutes Maximum Achievable Control Technology ("MACT") for mercury control for this source category. Subpart YYYYY further explicitly approved the NVMSRP as a qualifying program.

In accordance with Section 63.10685(b), ECS satisfies the MACT standard for mercury control by purchasing motor vehicle scrap from scrap providers who participate in the NVMSRP. To that end, ECS has recently amended its mercury PPP to be consistent with 40 C.F.R. § 63.10685(b)(iv), which requires ECS to develop and maintain a plan demonstrating the manner through which ECS is participating in the NVMSRP. Accordingly, this semi-annual report focuses upon the actions that ECS has undertaken over the past six months consistent with the amended PPP, which is consistent with 40 C.F.R. § 63.10685(b)(iv).

Actions During Reporting Period

As noted above, on 30 December 2008 ECS submitted a MACT-level mercury PPP to the Department as an amendment to the January 2007 PPP. The following section lists

the elements of the amended PPP in italics and the actions that have occurred associated with those elements during the reporting period.

1. *ECS has instructed its purchasing agents to inform its motor vehicle scrap suppliers and brokers of the facility's participation in the NVMSRP and that all motor vehicle scrap provided to ECS should be procured from scrap suppliers that participate in the NVMSRP. These instructions were provided in the form of an internal memorandum to the ECS purchasing director, which is included in Attachment A.*

Actions: ECS previously instructed its purchasing agents consistent with this plan provision and confirmed the instructions in writing in an internal memorandum to Don Silinski, Director of Purchasing.

A. *ECS has revised its purchase specification to include the following statement: "Scrap must be purchased from providers that have minimized the presence of mercury in scrap through participation in the NVMSRP or another EPA-approved program." A copy of the revised purchase specification is included in Attachment B.*

Actions: ECS' purchase specifications during the six-month reporting period have included a statement consistent with this provision.

B. *A sample letter to brokers and direct suppliers consistent with Section 1 of this PPP is included as Attachment C.*

Actions: No action necessary during this reporting period – ECS had previously transmitted similar letters to all current brokers and direct suppliers.

2. *ECS will request written documentation from its direct scrap suppliers on a semi-annual basis confirming that they participate in the NVMSRP. ECS will also consult the End of Life Vehicle Solutions ("ELVS") database on a semi-annual basis to confirm that its motor vehicle scrap providers are enlisted as participating members.*

Actions: ECS has requested written documentation from its direct scrap suppliers during this semi-annual reporting period confirming that they participate in the NVMSRP. ECS has also consulted the ELVS database during this semi-annual period to confirm that its motor vehicle scrap providers are enlisted as participating members.

3. *Prior to acceptance as an ECS vendor, new scrap providers will be required to provide written assurance that they participate in the NVMSRP, and ECS will consult the ELVS database to confirm that the new motor vehicle scrap supplier is participating in the NVMSRP.*

Actions: ECS has not utilized any new scrap providers during this reporting period.

4. *ECS will request from its brokers on a semi-annual basis written assurance that any motor vehicle scrap provided by such broker to ECS was procured from suppliers who are participating in the NVMSRP. New brokers will be required to provide such assurance prior to acceptance as an ECS vendor.*

Actions: ECS has requested written assurances from its brokers during this semi-annual reporting period that any motor vehicle scrap provided by such broker was procured from suppliers who are participating in the NVMSRP. ECS has not utilized any new scrap providers during this reporting period.

5. *ECS will inform its scrap suppliers that ECS may conduct site visits to ensure that steps are being taken to remove mercury switches from the scrap consistent with the supplier's participation in the NVMSRP. ECS will request its scrap suppliers to communicate this information upstream to their dismantlers, shredders, crushers, and other suppliers. ECS will conduct site visits to five of its motor vehicle scrap suppliers each calendar year to confirm that the supplier is aware of the need to participate in the NVMSRP and that the supplier is actually removing the switches consistent with their participation in the NVMSRP.*

Actions: ECS previously informed its scrap suppliers about possible site visits and has commenced such site visits during the six month reporting period. ECS requested its scrap suppliers to communicate this information upstream to their dismantlers, shredders, crushers, and other suppliers.

6. *ECS will continue to coordinate with its trade associations, the Steel Manufacturers Association ("SMA") and the American Iron and Steel Institute ("AISI") to implement practices consistent with participation in the NVMSRP.*

Actions: ECS coordinated with SMA and AISI to implement practices consistent with participation in the NVMSRP.

7. *ECS shall not use steel scrap originating from municipal waste incinerators for recycling.*

Actions: ECS did not use steel scrap originating from municipal waste incinerators for recycling during the six month reporting period.

To: Don Silinski, Director of Purchasing
From: Victor Clark, Vice President, General Manager
Date: 29 December 2008
Re: National Vehicle Mercury Switch Removal Program



As you are aware, our company participates in the National Vehicle Mercury Switch Removal Program (NVMSRP) and has enhanced our mercury pollution prevention program. This memorandum serves to confirm the formal direction given to you of the following purchasing policies:

1. All motor vehicle scrap provided to our company should be procured from scrap suppliers that participate in the NVMSRP.
2. The purchase specification must include the following statement: "Scrap must be purchased from providers that have minimized the presence of mercury in scrap through participation in the NVMSRP or another EPA-approved program."
3. The company will request written documentation from its direct scrap suppliers on a semi-annual basis confirming that they participate in the NVMSRP. The company will also consult the End of Life Vehicle Solutions ("ELVS") database on a semi-annual basis to confirm that its motor vehicle scrap providers are enlisted as participating members.
4. Prior to acceptance as a vendor, new scrap providers will be required to provide written assurance that they participate in the NVMSRP, and the company will consult the ELVS database to confirm that the new motor vehicle scrap supplier is participating in the NVMSRP.
5. The company will request from its brokers on a semi-annual basis written assurance that any motor vehicle scrap provided by such broker to our facility was procured from suppliers who are participating in the NVMSRP. New brokers will be required to provide such assurance prior to acceptance as a vendor.
6. The company will inform our scrap suppliers that we may conduct site visits to ensure that steps are being taken to remove mercury switches from the scrap consistent with the supplier's participation in the NVMSRP. We will ask our scrap suppliers to communicate this information upstream to their dismantlers, shredders, crushers, and other suppliers. We will conduct site visits to five of our motor vehicle scrap suppliers each calendar year to confirm that the supplier is aware of the need to participate in the NVMSRP and that the supplier is actually removing the switches consistent with their participation in the NVMSRP.
7. The company will not use steel scrap originating from municipal waste incinerators for recycling.

SCRAP METAL PURCHASE SPECIFICATION

PURCHASE SPECIFICATION

1. Scrap materials must be depleted to the extent practicable of undrained used oil filters, chlorinated plastics, and free organic liquids.
2. Lead-containing components of scrap, such as batteries, battery cables, and wheel weights, must be removed.
3. Scrap must be purchased from providers that have minimized the presence of mercury in scrap through participation in the National Vehicle Mercury Switch Recovery Program (NVMSRP) or another EPA-approved program.
4. Steel scrap must not originate from municipal waste incinerators.

22 December 2008

Mr. Michael Seletsky
Recycle Metals Corp.
407 Alan Wood Road
Conshohocken, PA 19428

Re: National Vehicle Mercury Switch Recovery Program

To Whom It May Concern:

This letter is to inform you that Evraz Claymont Steel is participating in the National Vehicle Mercury Switch Recovery Program ("NVMSRP"). The NVMSRP is a national partnership of steel producers, scrap recyclers, vehicle manufacturers, State agencies, environmental organizations, and the U.S. Environmental Protection Agency ("EPA"). The goal of the program is to reduce the presence of mercury in the scrap supply by facilitating the removal of mercury-containing switches from end-of-life vehicles before they are flattened, shredded, and melted to make new steel.

We believe that the NVMSRP is the most effective means of minimizing potential mercury releases to the environment and we strongly encourage you to participate in this important program. As part of our participation to the program, we have committed to requiring our scrap suppliers to verify that they are taking steps to minimize the presence of mercury-containing switches in vehicle scrap by demonstrating either their participation in the program or that they have implemented a similar mercury minimization program.

Participation in the NVMSRP is open to all parties in the scrap supply chain, with the ultimate goal of achieving the removal of mercury-containing switches before end-of-life vehicles are crushed and shredded. If your company or facility receives vehicle scrap that already is crushed and/or shredded, your participation in the program would require you, in turn, to urge participation by your suppliers.

The NVMSRP is operated by the End of Life Vehicles Solutions Corporation ("ELVS"). At no cost, ELVS can supply you (or your supplier) with: (1) a collection bucket; (2) a list of vehicles that potentially contain mercury switches; (3) a removal brochure; (4) an instructional DVD; and, (5) detailed shipping instructions for the switches. ELVS also will cover all of the shipping and disposal costs for the switches collected by your company. If you would like to participate and receive these materials at no cost, you should contact ELVS at www.elvsolutions.org.

Regardless of your participation in the NVMSRP, Evraz Claymont Steel will seek documentation of your (or your supplier's) efforts to remove mercury switches from vehicles before the scrap is sent to our facility. This may entail a demonstration of your participation in NVMSRP (or establishment of your own mercury minimization program), as well as a plan to implement the program requirements, including communications to upstream scrap suppliers. Additionally, so that we may ensure that our incoming scrap supply is as free as practicable from mercury-containing switches, we may contact you in the future to arrange for a visit to verify your efforts to ensure that mercury switches have been removed from the vehicle scrap that is purchased by our facility.

Evraz Claymont Steel appreciates your cooperation with these policies to prevent mercury-containing switches from entering our scrap feedstock and we encourage you to participate in this voluntary program. Evraz Claymont Steel also recognizes that, oftentimes, the removal of mercury switches from vehicles before crushing or shredding is most appropriately handled by your upstream suppliers. As such, please consider passing along this information to your suppliers and encouraging them to participate as well.

If you or any of your suppliers have any questions, please feel free to contact me at (302) 792-5444. Thank you for your help in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "David Wagner". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

David Wagner
Environmental Consultant

22 December 2008

Mr. Pete Meyers
ProTrade Steel Company, Ltd
5700 Darrow Road
Hudson, OH 44236

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David Wagner
Environmental Consultant

22 December 2008

Mr. Ron Greller
Morris Iron and Steel Co., Inc.
7345 Milnor Street
Philadelphia, PA 19136

Re: National Vehicle Mercury Switch Recovery Program

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David Wagner
Environmental Consultant

22 December 2008

Mr. Kevin Bugg
The David J. Joseph Company
500 East Swedesford Road
Suite 102
Wayne, PA 19087

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David Wagner
Environmental Consultant

22 December 2008

Mr. Bob Bonnes
Tube City IMS
300 Conshohocken State Road
Suite 200
West Conshohocken, PA 19428

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