



A Tyco International Ltd. Company

# CLAYMONT STEEL INC.

## FUGITIVE DUST CONTROL MONTHLY PROGRESS REPORT #1

**January 2008**

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Project No. 98250

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- APPENDIX B: OUTSIDE SLAG SALES SUMMARY – JANUARY 2008

## **1 INTRODUCTION**

On December 21, 2007 the Delaware Department of Natural Resources and Environmental Control (DNREC) approved the implementation plan and schedule submitted by Claymont Steel in support of the required projects and tasks associated with the improvements to dust control measures at its steel-making facility in Claymont, Delaware.

Regular communication of progress status with DNREC is an important aspect of this implementation plan. Monthly progress reports are part of the approved implementation plan. They are due on the first day of each month to report on progress of the various projects being undertaken.

This report covers activities up to January 31, 2008 and provides an update of the project progress, outlines the work planned for the following month, and identifies discussion items that require action or feedback to maintain progress on the overall implementation plan.

## **2 UPDATE ON PROJECT ACTIVITIES FOR CURRENT MONTH**

### **2.1 PROJECT MANAGEMENT AND MEETINGS**

- This report is Progress Report #1 for January 2008 and has been submitted on the planned submission date of February 1, 2008.

### **2.2 REGULATORY REVIEW**

- Existing air permits and supporting information has been requested from Claymont Steel and will be reviewed as the initial step in this task.

### **2.3 EMISSIONS IMPACT ASSESSMENT**

- As part of the plan to track progress and to establish priorities for implementation of certain upgrade projects, a detailed emissions impact assessment task is being undertaken.
- Initial field work is required to gather information and supporting documentation. The plan for this work is in final development.

### **2.4 MELT SHOP**

#### **2.4.1 Fume Control System Assessment**

- Earth Tech is currently developing a Work Plan detailing the field work scope, objectives and procedures.
- Field work is planned for mid February.
- This fume control system assessment will establish the current operating condition and performance of the existing fume control systems and will identify components of the systems that require modification or upgrade to improve control of fugitive emissions from melt shop operations.

#### **2.4.2 Scrap Bay Operations Changes (Rail to Truck)**

- Evraz (new owners) are reviewing the planning capital expenses associated with this project.
- Status of approval by Board of Directors – Evraz are reviewing the planning capital expenses with their board.

- Status of detailed equipment specification development – Tentative engineering is complete, and with the board's approval, final specifications will be provided.

#### **2.4.3 Baghouse for Carbon and Lime Transfer**

- No activity was planned for this task.

#### **2.4.4 Fume Control System Improvements**

- No activity was planned for this task.
- This task will be further defined following completion of the melt shop fume system assessment.

### **2.5 SLAG QUENCHING**

- No activity was planned for this task.

### **2.6 ROADWAYS**

#### **2.6.1 Paving**

- No activity was planned for this task.

#### **2.6.2 Truck Wheel Wash Station**

- No activity was planned for this task.

#### **2.6.3 Speed Limit Enforcement**

- Enforcement has been ongoing and continues via onsite security.
- Order new signs – Signs are posted, however, Claymont Steel is ordering additional signage to increase the awareness within the mill.
- Safety program training sessions – Updated via monthly safety meetings and during tool box meetings within the mill.
- Orientation programs – These are being incorporated during new hire orientations.
- Report on follow-up enforcement activities – Security is monitoring effectiveness and updates accordingly to Claymont Steel personnel on outstanding issues.

## **2.7 SCRAP YARD**

### **2.7.1 Relocate Stockpiles**

- Piles have been relocated within the scrap yard during the recent outage.
- During outage, shred piles were relocated further away and closer to the turning piles to limit any potential airborne issues in relation to Naamans Road area and surrounding community.
- Periodic pile relocation – Further pile relocation will be a direct relation to the start of the rubber tire project.

### **2.7.2 Tree-lined Berm**

- No activity was planned for this task.

## **2.8 SLAG YARD**

### **2.8.1 Enclosure for Charge Hopper**

- No activity was planned for this task.

### **2.8.2 Spray System Improvements**

- No activity was planned for this task.

### **2.8.3 Minimize Inventory of Processed Slag**

- January's slag production was 5488.28 tons from the melt tons produced. Of the produced, 5883.69 tons of slag was sold. Net reduction of inventory by 395.41 tons. See Appendix B for detailed summary of slag sales.
- Summarize inventory reduction strategy – The sale of slag will be maximized and the usage within the cement industry will be promoted.

## **2.9 AMBIENT AIR MONITORING PROGRAM**

- Locations
  - Knollwood and Woodshaven Parks locations have granted permission. Final landowner agreements are expected to be in place in early February. Claymont Steel is finalizing these agreements.

- Lawncroft Cemetery has denied our request for using their property for one of the monitoring locations.
  - 84 Lumber is being considered as a replacement for Lawncroft Cemetery. Based on preliminary discussions with the manager of the store, we are optimistic that this location can be secured for this station.
  - Preliminary discussion with DNREC as to the suitability of this site took place on January 31. This site was considered originally and was technically feasible for locating a monitoring station. However, it was not approved based on public feedback that it would not adequately represent the impacts being experienced in Aniline Village. Based on the limited number of other suitable sites, it was agreed that this site would be reconsidered and the technical considerations required to address elevation and proximity to roadways would be addressed and re-submitted to DNREC for review and approval. This is expected in early February.
  - Waterfall Conference Center has not been confirmed yet. Claymont Steel continues to discuss the proposed use of their facility. Confirmation of the owners' decision is expected in early February. A suitable alternative, upwind location for a monitoring has not been identified due to the density and urbanized nature of the area.
  - Monitors
    - Monitoring equipment was to be received within 6 weeks of order. Thermal Scientific is projecting the monitors will arrive in late February. As this will cause a delay in the monitoring program start-up, Earth Tech is looking into other suppliers and the interim availability of rental equipment that could be deployed immediately in order to keep on schedule. Results of this will be communicated on an on-going basis.
  - Contractors
    - An accredited laboratory is under contract to perform the analyses for a period of 1 year.
    - Contractors are being contracted for the electrical, fencing and stone (if needed). Earth Tech has located and contacted seven who may be able to perform the work in the Claymont area. Three of the contractors said they may be able to perform the work. Earth Tech has requested quotes from these three contractors. A contractor will be selected in early February.
-

### **3 WORK PLANNED FOR THE NEXT MONTH**

The following work is planned for the next month:

#### **3.1 PROJECT MANAGEMENT AND MEETINGS**

- Progress Report #2 for February 2008 will be submitted on March 3, 2008 (March 1 falls on a weekend).
- The first quarterly progress update meeting with Claymont Steel and DNREC to inform progress status is planned for early February.

#### **3.2 REGULATORY REVIEW**

- A review of the current regulatory status will be initiated to establish the framework within which any new permits for new controlled sources of air emissions need to be developed.
- The regulatory review will follow the field work associated with the emissions inventory to ensure that all current documentation and emissions estimates are included.
- The task will consist of reviewing the existing air permits and assessing regulatory requirements for any new controlled sources of air emissions required to control fugitive dust emissions.
- It is expected that the regulatory review will be initiated in mid February.

#### **3.3 EMISSIONS IMPACT ASSESSMENT**

- Earth Tech will conduct the field work required to develop the emissions inventory, in conjunction with the field work for the Fume Control System Assessment.
- Field work will be executed in mid February 2008 for 3 to 4 days.
- An air dispersion model will be set up with all sources of dust identified for the melt shop and slag yard areas of the plant. This will take place in parallel with the implementation of Phase 1 projects and the start-up of the ambient air monitoring program. The air dispersion model will be used to predict expected impact reductions for each project and will be incorporated into the progress tracking process.
- It is expected that development of the air dispersion model will begin in late February after the information from the field work is assembled and analyzed.

### **3.4 MELT SHOP**

#### **3.4.1 Fume Control System Assessment**

- Field work is planned for mid February.
- Assessment of the results of the field work will continue directly after the field work.

#### **3.4.2 Scrap Bay Operations Changes (Rail to Truck)**

- Large equipment specifications – Preliminary engineering is complete.

#### **3.4.3 Baghouse for Carbon and Lime Transfer**

- No work is planned for February.
- The details of the requirements for this work will be defined by the melt shop fume control system assessment.

#### **3.4.4 Fume Control System Improvements**

- No work is planned for February.
- The details of the requirements for this work will be defined by the melt shop fume control system assessment.

### **3.5 SLAG QUENCHING**

- The design of the enclosure for the slag quenching operations will be initiated in February.
- The basis of design will be dependant upon the final decision of whether this operation will be moved into the melt shop scrap bay area.

### **3.6 ROADWAYS**

#### **3.6.1 Paving**

- Development of the paving specifications will be initiated in February.
- Tender documents are expected to be issued to qualified contractors by late February.

#### **3.6.2 Truck Wheel Wash Station**

- Final design of the required system configuration will be completed in February.
- Tender package will be developed and issued for quotation by the end of February.

### **3.6.3 Speed Limit Enforcement**

- It is expected that a follow-up enforcement summary of the effect of new speed limit implementation will be provided in the next progress report.

## **3.7 SCRAP YARD**

### **3.7.1 Relocate Stockpiles**

- A summary of any periodic pile relocations that were accomplished in February will be provided in the next progress report.

### **3.7.2 Tree-lined Berm**

- No work is planned for next month.

## **3.8 SLAG YARD**

### **3.8.1 Enclosure for Charge Hopper**

- Design of the charge hopper enclosure will be initiated in early February.
- Fabrication is expected to be initiated in late February.
- Installation should be complete in early March.
- The purpose of this enclosure is to prevent strong wind and cross breezes from causing fugitive dust emissions from charge hopper loading activities.

### **3.8.2 Spray System Improvements**

- Planning for spray system improvements for the slag pit operations and slag stockpiles will begin in late February.

### **3.8.3 Minimize Inventory of Processed Slag**

- If long term storage of slag is planned as part of the overall slag inventory management plan, suitable coverings will be investigated and an approach decided upon in February.
- Periodic depletions of slag are scheduled to begin in February. This will be summarized in future monthly reports.

### **3.9 AMBIENT AIR MONITORING**

- Alternative site for downwind station based on discussion with DNREC will be finalized. The location at 84 Lumber is being considered. A justification of the technical feasibility of this site will be submitted to DNREC for review and approval in early February.
- The location at 84 Lumber was originally proposed as the downwind monitoring location. In response to residents' concern about the adequacy of this location, DNREC did not approve it. However, based on the rejection of the proposal to Lawn Croft Cemetery, the 84 Lumber location warrants reconsideration. Based on the January 31, 2008 meeting with Earth Tech, Claymont Steel and DNREC, DNREC has agreed to reconsider 84 Lumber. Earth Tech will submit to DNREC a memo technically justifying the advantages of this location. Final decision will be determined by DNREC.
- Landowner agreements will be finalized for the 2 sites already agreed to with owners. This is expected in the first week of February.
- Final decision from the owner of the Waterfall Conference Centre is expected in the first week of February.
- Delivery of monitoring equipment (or rentals) will be expedited.
- Construction of the security fencing and power supply required for each location will be completed in February.
- Commissioning of all monitoring stations that have been approved will take place upon arrival of the equipment (or interim rental units). This is expected to be completed in mid to late February.

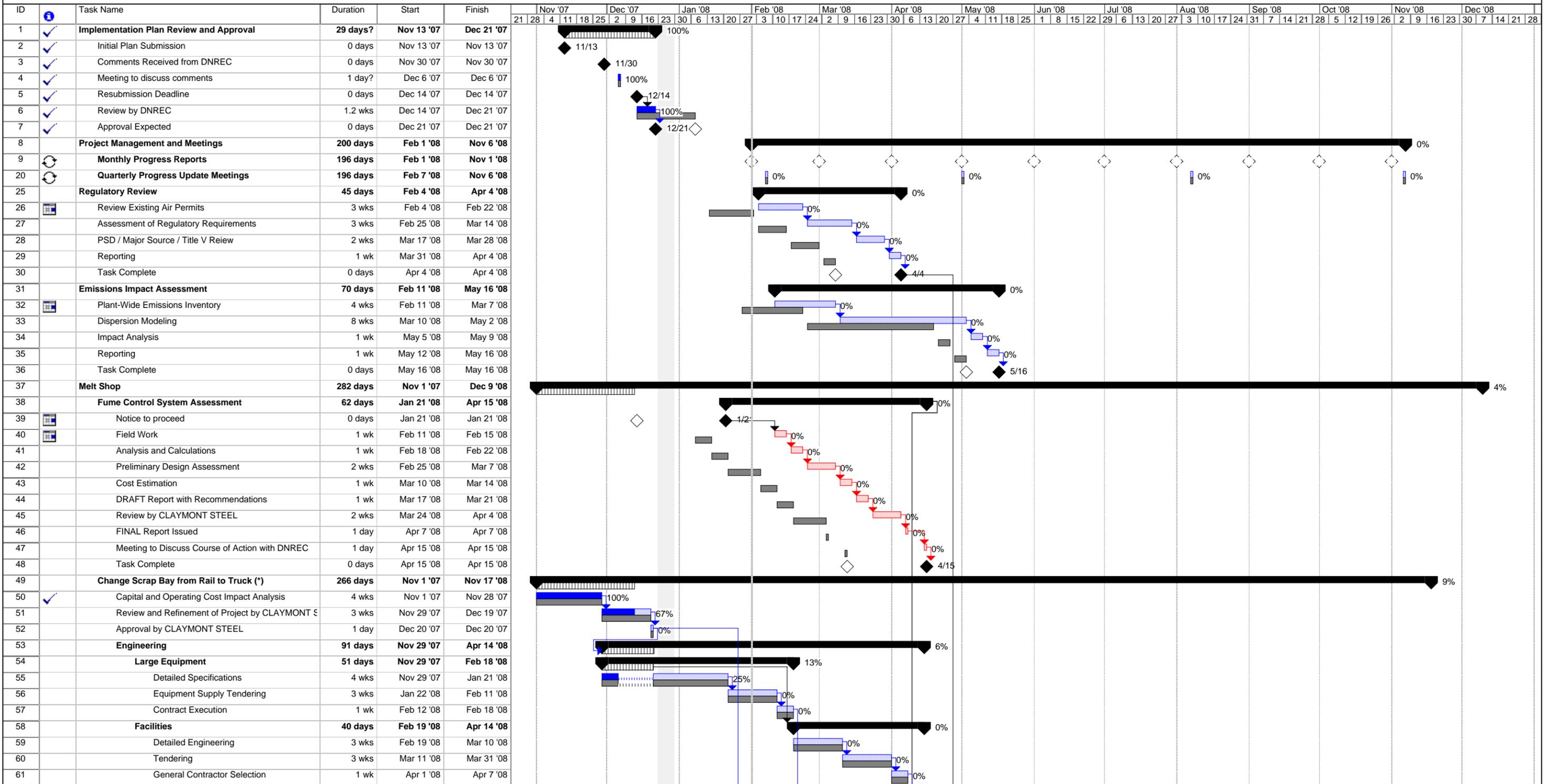
# **APPENDIX A**

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## **Updated Implementation Schedule**

**Claymont Steel  
Implementation Plan  
Dust Control Projects**

Update # 1  
February 1, 2008



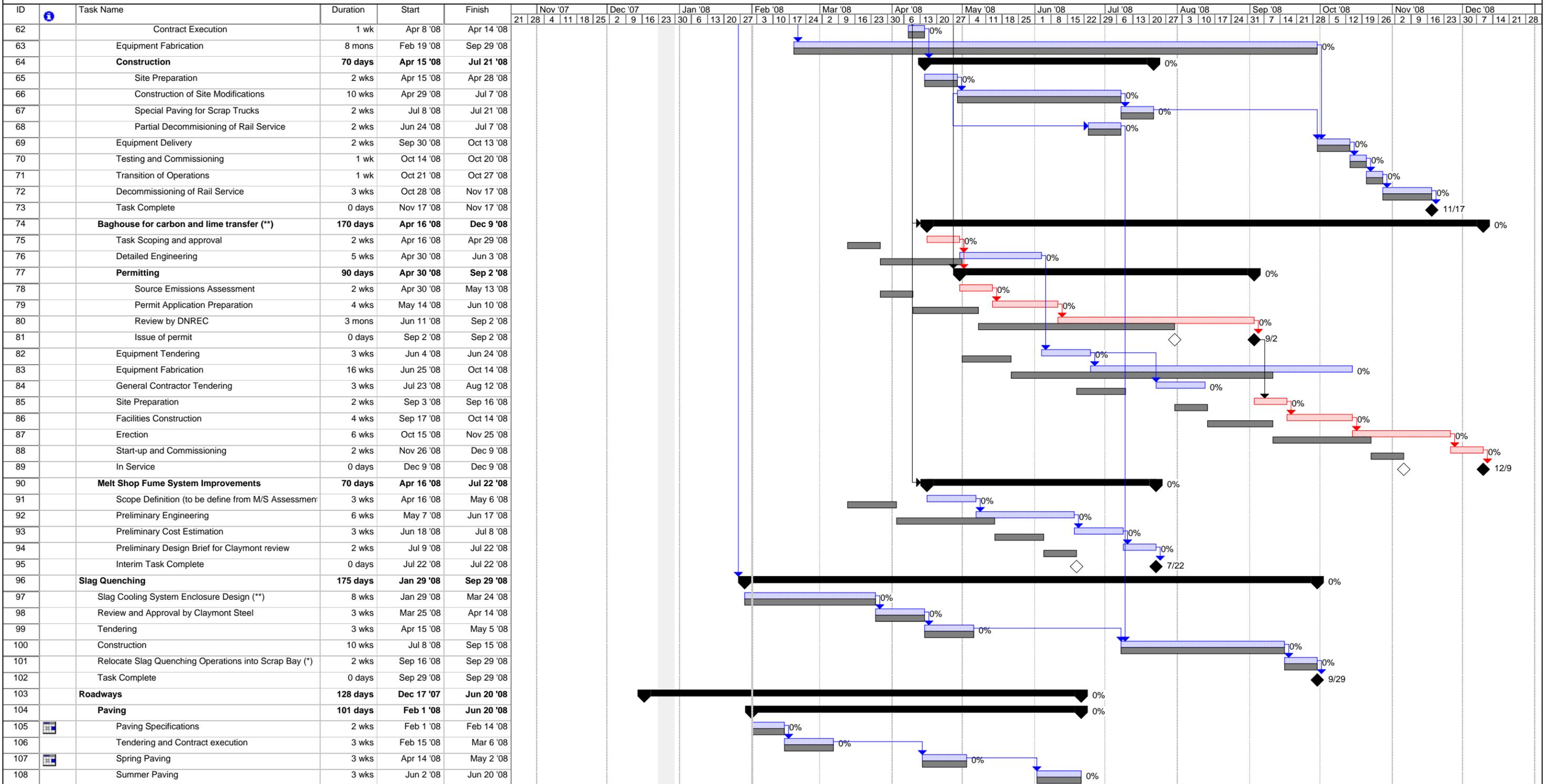
**Earth Tech Inc.**  
Printed: Feb 1 '08



**Notes:**  
(\*) - Subject to approval of "Rubber Tire" project by Claymont Steel  
(\*\*) - Subject to outcome of melt Shop Fume System Assessment

**Claymont Steel  
Implementation Plan  
Dust Control Projects**

Update # 1  
February 1, 2008



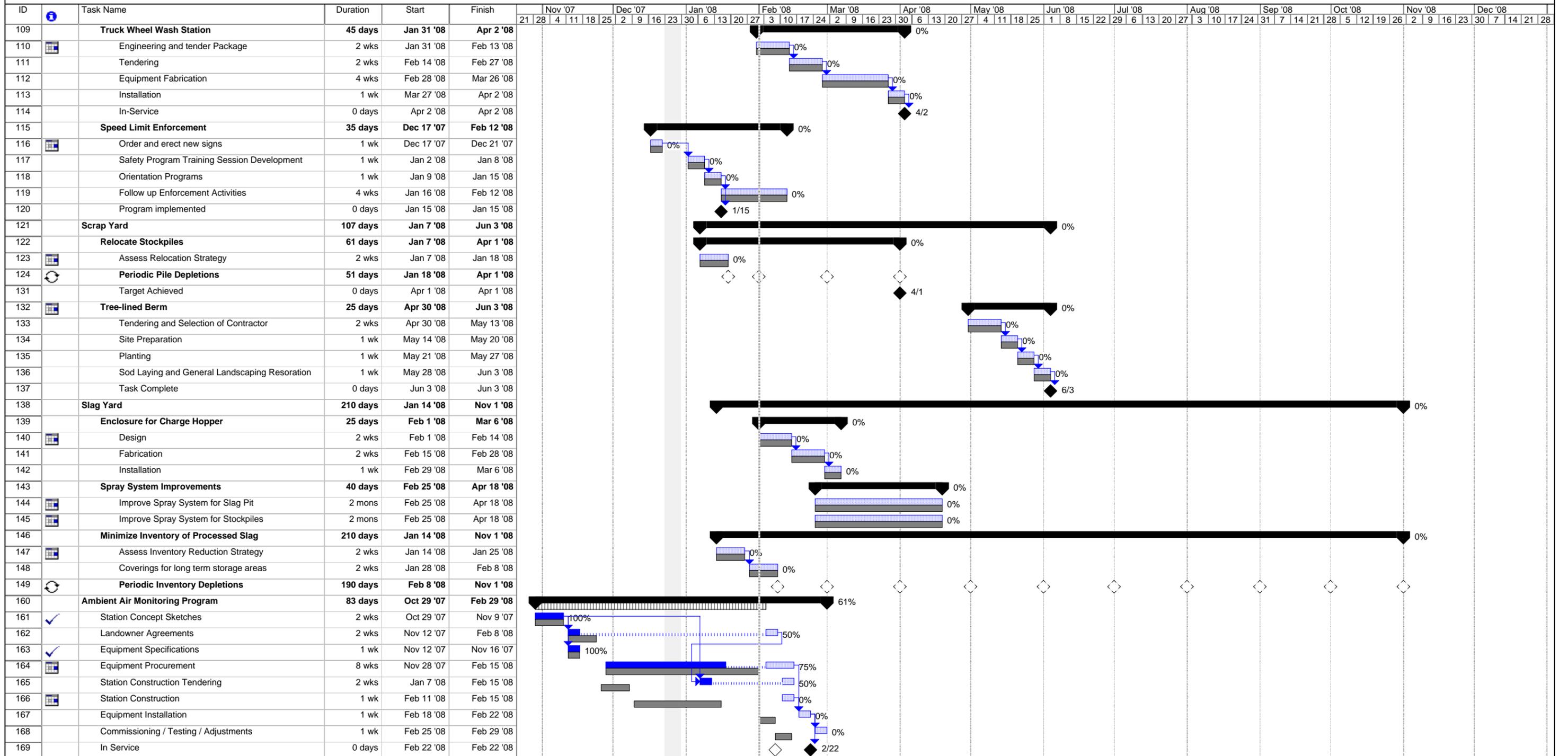
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Critical		Task		Baseline		Milestone		Project Summary		Deadline	
Critical Split		Split		Baseline Split		Summary Progress		External Tasks			
Critical Progress		Task Progress		Baseline Milestone		Summary		External Milestone			

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**Claymont Steel  
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(\* ) - Subject to approval of "Rubber Tire" project by Claymont Steel  
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## **APPENDIX B**

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# **Outside Slag Sales Summary**

## **January 2008**

