

# Evraz Claymont Steel

## Fugitive Dust Control

### Monthly Progress Report #9

### September 2008

**Site:**

Evraz Claymont Steel  
4001 Philadelphia Pike  
Claymont, Delaware, 19703

**Prepared for:**

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October 2, 2008

Earth Tech AECOM Project No. 98250

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## 1 INTRODUCTION

On December 21, 2007 the Delaware Department of Natural Resources and Environmental Control (DNREC) approved the implementation plan and schedule submitted by Evraz 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 September 30, 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.

Note should be made that on July 26, 2008 Earth Tech was acquired by AECOM and has been conducting business as Earth Tech AECOM. As of October 6, 2008 all operating units will operate as AECOM. There has been no change in project staff or corporate organization structure that will adversely affect the delivery of this project. All future communications and reports generated by the engineering team will be using the AECOM name and branding.

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

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

- This report is Progress Report #9 for September 2008 and has been submitted on October 2, 2008.
- Although the submission schedule of these progress reports were initially intended to be submitted on the 1<sup>st</sup> of each month, they are planned for submission within two business days of the 1<sup>st</sup> to allow for inclusion of slag production and shipping information from the previous month. This ensures that each progress report contains the most recent slag production information.

### **2.2 REGULATORY REVIEW**

- No activity was planned for this task. Title V review and reporting will be completed following dispersion modelling results.

### **2.3 EMISSIONS IMPACT ASSESSMENT**

- On September 9, 2008, DNREC and Earth Tech AECOM modelling personnel toured the facility, the area around the facility and the ambient air monitors to discuss the next steps and approach to dispersion modelling.
- DNREC has requested that, based on this meeting and other background information, a dispersion modelling protocol document be prepared, that presents the objectives, methodology and expected results for review and approval. This will ensure that the dispersion modelling effort meets the objectives of Evraz Claymont Steel and DNREC. This document is expected to be submitted to DNREC for review in early October 2008.

### **2.4 MELT SHOP**

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

- The draft report was issued in June 2008 and is currently under review by Evraz Claymont Steel.

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

- Evraz Claymont Steel are reviewing and planning capital expenses associated with this project.

- Final equipment specifications will be provided upon the board's approval.

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

- Based on the outcome of the melt shop fume control system assessment, the fugitive emissions from these sources have been identified as maintenance issues with existing control systems. A new baghouse will not be required for these sources.

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

- No activity was planned for this task.
- Action items will be developed based on the final fume control system assessment report.

### **2.5 SLAG QUENCHING**

- Nozzle review and determining if additional measures are needed are currently underway.

### **2.6 ROADWAYS**

#### **2.6.1 Paving**

- A new paving contract is under consideration.

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

- Wash system installed and operational.

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

- On-going enforcement and monitoring is carried out by Evraz Claymont Steel security.

### **2.7 SCRAP YARD**

#### **2.7.1 Relocate Stockpiles**

- Periodic pile relocation continued.
- Target achieved.

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

- Evraz Claymont Steel is considering a concrete block wall in lieu of a tree-lined berm to serve as a dust and noise barrier and visual screen.

## **2.8 SLAG YARD**

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

- The charge hopper design is complete. Fabrication is expected to commence in October.

### **2.8.2 Spray System Improvements**

- No activity was planned for this task. Working on nozzle review and if additional measures are needed.

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

- September's slag production was 5,199 tons from the melt tons produced. The amount of slag material sold in September was 9,313 tons, representing a significant net reduction in on-site storage of processed slag material. See Appendix B for a detailed summary of slag production and sales values.
- September's scarfings and mill scale production was 841 tons. The amount of this material sold in September was 2,136 tons, representing a significant reduction in on-site storage of processed scarfings and mill scale material. See Appendix B for a detailed summary of scarfing and mill scale production and sales values.

## **2.9 AMBIENT AIR MONITORING PROGRAM**

- Earth Tech AECOM staff from the Harrisburg, Pennsylvania office continues to maintain the monitors and retrieve and reset the samples every 6 days. The program is intended to run for 12 months.

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

The following work is planned for the next month:

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

- Progress Report #10 for October 2008 will be submitted on or around November 1<sup>st</sup>.
- A meeting with DNREC and Evraz Claymont Steel is to be scheduled for mid to late October 2008 to discuss progress and next steps on significant projects in the implementation plan that are currently being considered.

#### **3.2 REGULATORY REVIEW**

- Title V review and reporting will be completed following dispersion modelling results.

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

- Impact analysis will be performed based on the results from dispersion modelling.
- A dispersion modelling protocol will be prepared by Earth Tech AECOM and presented to DNREC. This protocol will identify the scope and approach of the dispersion modelling, and any restrictions and challenges in the modelling.

#### **3.4 MELT SHOP**

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

- Results and design concepts identified in the Melt Shop Fume Control Assessment Report will be discussed with Evraz Claymont Steel.
- Action items will be developed based on the review of the draft report and the final recommendations.

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

- Large equipment specifications – Further work is pending approval by the new Board of Directors.

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

- The recent melt shop fume control system assessment did not identify a need for a baghouse for these emissions sources. No further action is planned at this time.

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

- Design concepts for fume control system improvements will be discussed with Evrax Claymont Steel.

### **3.5 SLAG QUENCHING**

- The design of the enclosure for the slag quenching operations is on hold pending approval of scrap bay re-design project.
- The basis of design will be dependent 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**

- A new paving contract is under consideration.

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

- Implemented in April 2008. Task complete.

#### **3.6.3 Speed Limit Enforcement**

- This project has been implemented. On-going enforcement and monitoring will be carried out by Evrax Claymont Steel security.

### **3.7 SCRAP YARD**

#### **3.7.1 Relocate Stockpiles**

- The relocation of stockpiles has been completed.
- Any further impact from the Rubber Tire Project will be assessed as required.

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

- Evrax Claymont Steel is considering a concrete block wall in lieu of a tree-lined berm to serve as a dust and noise barrier and visual screen.

### **3.8 SLAG YARD**

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

- The charge hopper design is complete. Fabrication is expected to commence in October. Installation is expected to be completed during November.

#### **3.8.2 Spray System Improvements**

- Planning for spray system improvements is ongoing.

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

- On-going slag storage reduction will continue to be monitored and reported monthly.

### **3.9 AMBIENT AIR MONITORING**

- On-going monitoring, data analysis and progress reporting will continue in October.
- A report is required to be submitted to DNREC presenting the results of the ambient air monitoring program, however, significant assessment is required in order for the data to be meaningful and to ensure that accurate interpretation of the results is conveyed to DNREC and the general public. Performing the air dispersion modelling is required before a meaningful report can be developed.
- Timing and analysis requirements for this presentation of ambient air monitoring data will be discussed at the upcoming meeting with DNREC in October.

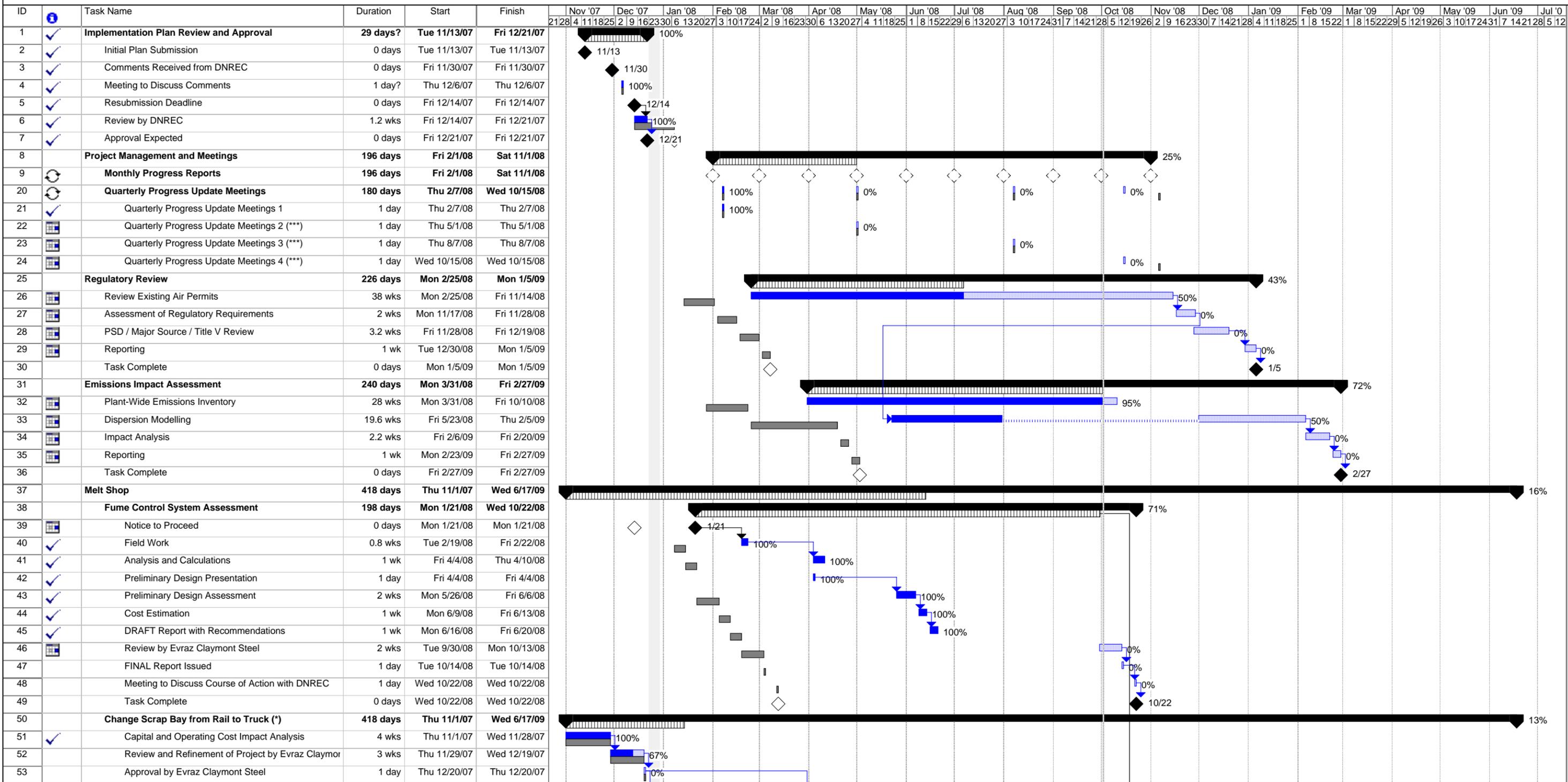
# **APPENDIX A**

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## **Updated Implementation Schedule**

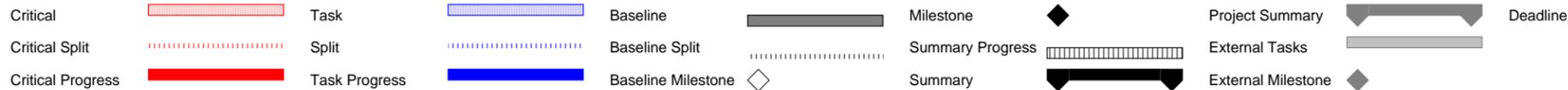
**Evraz Claymont Steel  
Implementation Plan  
Dust Control Projects**

Update # 9  
October 1, 2008



Earth Tech Inc.

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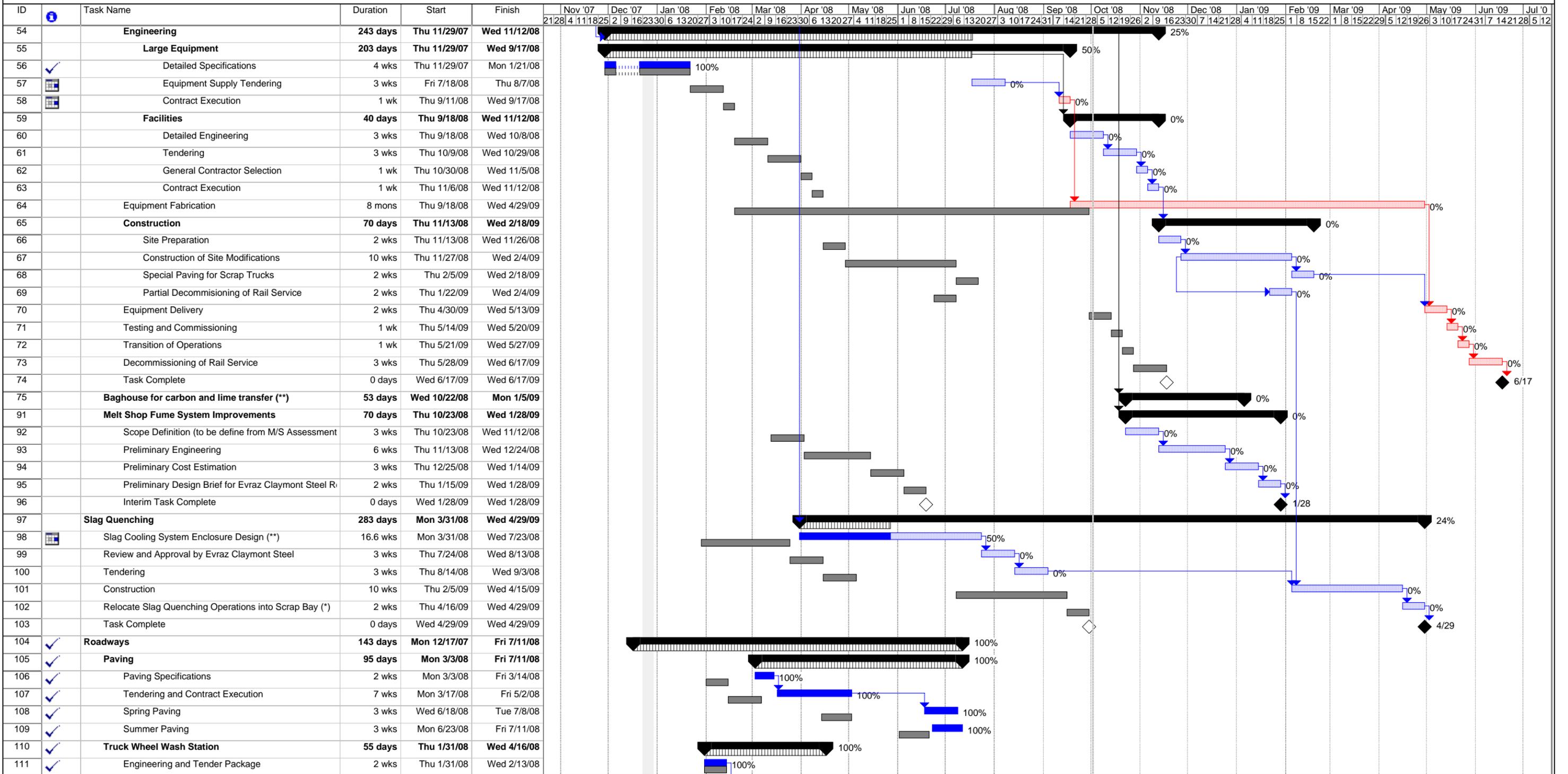


**Notes:**

(\*) - Subject to approval of "Rubber Tire" project.  
 (\*\*\*) - Melt Shop Fume System Assessment did not identify a need for baghouse.  
 (\*\*\*\*) - Progress Update 2 and 3 was cancelled. Progress Update 4 is scheduled for mid-October 2008.  
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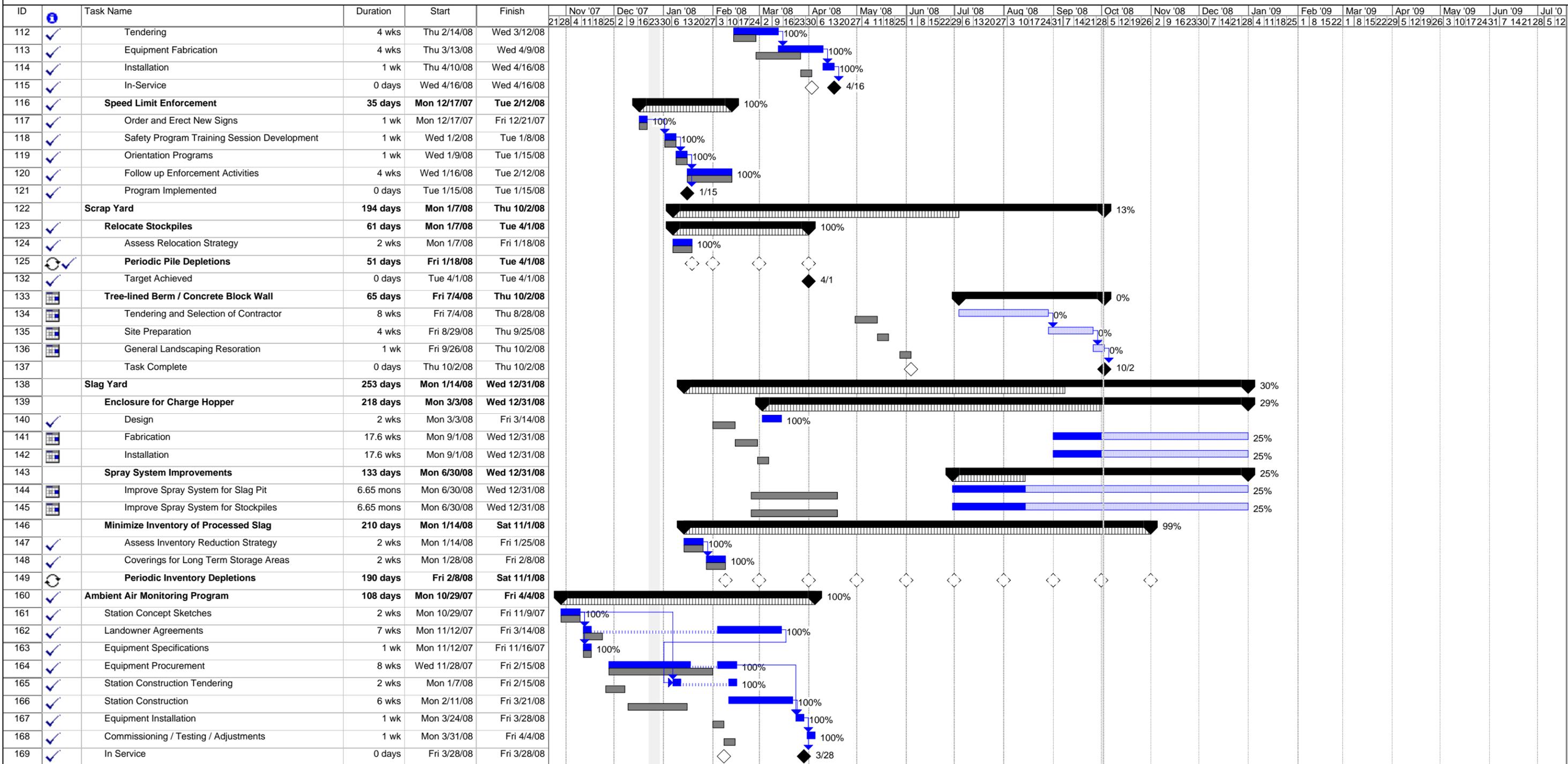
Critical		Task		Baseline		Milestone		Project Summary		Deadline	
Critical Split		Split		Baseline Split		Summary Progress		External Tasks			
Critical Progress		Task Progress		Baseline Milestone		Summary		External Milestone			

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## **APPENDIX B**

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# **Outside Sales Summary September 2008**

## SEPTEMBER 2008 OUTSIDE SALES

<b>SLAG PRODUCED</b>	5199.00
<b>SCARFINGS/MILLSALE PRODUCED</b>	841.00

### Material

Customer	Type of Material	# of Loads	Total tons
Billy Warren	2A	15	249.54
DSWA Cherry Island	2A	260	6169.34
CitiSteel	2A	20	500.21
Morris Iron	2A	2	32.26
W Synder	2A	7	151.56
Cash Sale	2A	2	45.50
<b>Total</b>			<b>7148.41</b>

### Slag

Customer	Type of Material	# of Loads	Total tons
DSWA Cherry Island	2"x4"	83	2006.05
DSWA Sussex	2"x4"	7	110.03
CitiSteel	2"x4"	0	0
<b>Total</b>			<b>2116.08</b>

Customer	Type of Material	# of Loads	Total tons
DSWA Cherry Island	4+	2	48.94
<b>Total</b>			<b>48.94</b>

Total Tons      9313.43

### Material

Customer	Type of Material	# of Loads	Total tons
IDI	1/4"	0	0
Lehigh	1/4"	40	910.23
Chesapeake	1/4"	37	805.02
<b>Total</b>			<b>1715.25</b>

### Scarfings/Millsale

Customer	Type of Material	# of Loads	Total tons
Tubecity Wheeling-Pitt	1/2"x5"	0	0
Tubecity Smith Export	1/2"x5"	15	285.31
Tubecity Sayreville	4"x8"	7	117.38
<b>Total</b>			<b>402.69</b>

Customer	Type of Material	# of Loads	Total tons
Tubecity Fairless	5"-3'	0	0
Tubecity Smith Export	5"-3'	1	17.66
<b>Total</b>			<b>17.66</b>

Total Tons      2135.60