

Evraz Claymont Steel

Fugitive Dust Control Program

Monthly Progress Report #12

December 2008

Site:

Evraz Claymont Steel Inc.
4001 Philadelphia Pike
Claymont, DE, 19703

Submitted to:

Evraz Claymont Steel Inc.
4001 Philadelphia Pike
Claymont, DE, 19703

Prepared for:

Evraz Claymont Steel Inc.
4001 Philadelphia Pike
Claymont, DE, 19703

Prepared by:

AECOM
105 Commerce Valley Dr. W.
Markham, ON L3T 7W3

January 6, 2009

AECOM Project No. 98250

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1.0 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 or about the first day of each month to report on progress of the various projects being undertaken.

This report covers activities up to December 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.

2.0 UPDATE ON PROJECT ACTIVITIES

Each section below discusses the project activities that took place in the previous month and highlight where appropriate, that planned activities for coming months for each component of the Implementation Plan.

2.1 Project Management and Meetings

Update on Project Activities:

- This report is Progress Report #12 for December 2008 and has been submitted on January 5, 2009. The submission schedule of these progress reports are planned for submission within two to three business days of the 1st 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.
- Several conference calls were held between AECOM and Evraz Claymont Steel to discuss Evraz Claymont Steel comments on the draft Melt Shop Fume Control Assessment Report.

Planned Project Activities:

- A meeting will be planned with DNREC and Evraz Claymont Steel to discuss DNREC comments and the alternatives to implementing modifications to fume control systems in the melt shop identified in the draft Melt Shop Fume Control Assessment Report dated December 15, 2008.

2.2 Regulatory Review

Update on Project Activities:

- This task is integral to every project undertaken at Evraz Claymont Steel and there is no overall "Regulatory Review" project. This project will be deleted from future monthly progress reports.

Planned Project Activities:

- This project will be deleted from future monthly progress reports.

2.3 Emissions Impact Assessment

Update on Project Activities:

- No activity was planned for this task.

Planned Project Activities:

- Dispersion modeling will be conducted upon review and approval of the protocol by DNREC.

2.4 Melt Shop

2.4.1 Fume Control System Assessment

Update on Project Activities:

- Comments from Evraz Claymont Steel were incorporated in the draft Melt Shop Fume Control System Assessment Report. The draft report dated December 15, 2008 was submitted to DNREC on December 16, 2008 for review.

Planned Project Activities:

- Following DNREC's review and comments, the report will be revised and finalized.
- Certain alternatives will be identified for implementation based on discussions with DNREC, which are planned for January 2009.

2.4.2 Scrap Bay Operations

Update on Project Activities:

- Evraz Claymont Steel identified complexities with changing the scrap handling process from rail to truck and has decided not to pursue this project at this time.
- Evraz Claymont Steel replaced broken or missing building sheeting panels in the Scrap Bay area.

Planned Project Activities:

- There are currently no other projects planned for the Scrap Bay.

2.4.3 Carbon and Lime Transfer

Update on Project Activities:

- Lime conveyor belt covers were added.

Planned Project Activities:

- There are currently no other projects planned for the Carbon and Lime Transfer system.

2.4.4 Fume Control System Improvements

Update on Project Activities:

- Preliminary design alternatives for fume control system improvements have been included in the draft Melt Shop Fume Control System Assessment Report dated December 15, 2008.

Planned Project Activities:

- Preliminary design alternatives for fume control system improvements will be discussed with Evraz Claymont Steel and DNREC. Action items will be developed based on the results of the discussion.

2.5 Slag Quenching

Update on Project Activities:

- No improvements to the wet suppression system were deemed necessary based on a review of the existing system by Evraz Claymont Steel.

Planned Project Activities:

- No activity is planned for this task.

2.6 Roadways

2.6.1 Paving

Update on Project Activities:

- Approximately 35,000ft² of road was paved during December.

Planned Project Activities:

- Additional paving will be considered by Evraz Claymont Steel.

2.6.2 Truck Wheel Wash Station

Update on Project Activities:

- Implemented in April 2008. Task complete.

Planned Project Activities:

- No activity is planned for this task.

2.6.3 Speed Limit Enforcement

Update on Project Activities:

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

Planned Project Activities:

- On-going enforcement will be carried out by Evraz Claymont Steel security.

2.7 Scrap Yard

2.7.1 Relocate Stock Piles

Update on Project Activities:

- No activity was planned for this task.

Planned Project Activities:

- No activity is planned for this task.

2.7.2 Concrete Block Wall

Update on Project Activities:

- Evraz Claymont Steel is planning to construct a concrete block wall that is 250ft long and 15ft high along Naamans Road. The design of the wall was slightly modified based on input from Senator Carper.

Planned Project Activities:

- Construction of the wall is expected to commence in the first quarter of 2009.

2.8 Slag Yard

2.8.1 Enclosure for Charge Hopper

Update on Project Activities:

- Prior to fabrication, the enclosure was re-designed.

Planned Project Activities:

- This project is on hold pending further review of the dust emissions reductions that can be expected from this project.

2.8.2 Spray System Improvements

Update on Project Activities:

- Upkeep and maintenance of spray systems continue.

Planned Project Activities:

- No further improvements are planned.

2.8.3 Minimize Inventory of Processed Slag and Scarfing Fines

Update on Project Activities:

- December's slag production was 1,401 tons from the melt tons produced. The amount of slag material sold in December was 7,009.44 tons. See Appendix B for a detailed summary of slag production and sales values.
- December's scarfing and mill scale production was 285.63 tons. The amount of this material sold in December was 768.34 tons. See Appendix B for a detailed summary of scarfing and mill scale production and sales values.

Planned Project Activities:

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

2.9 Ambient Air monitoring Program

Update on Project Activities:

- AECOM staff from Harrisburg, Pennsylvania office maintains the monitors and retrieves and resets the samples every 6 days. The program is intended to run for at least 12 months.

Planned Project Activities:

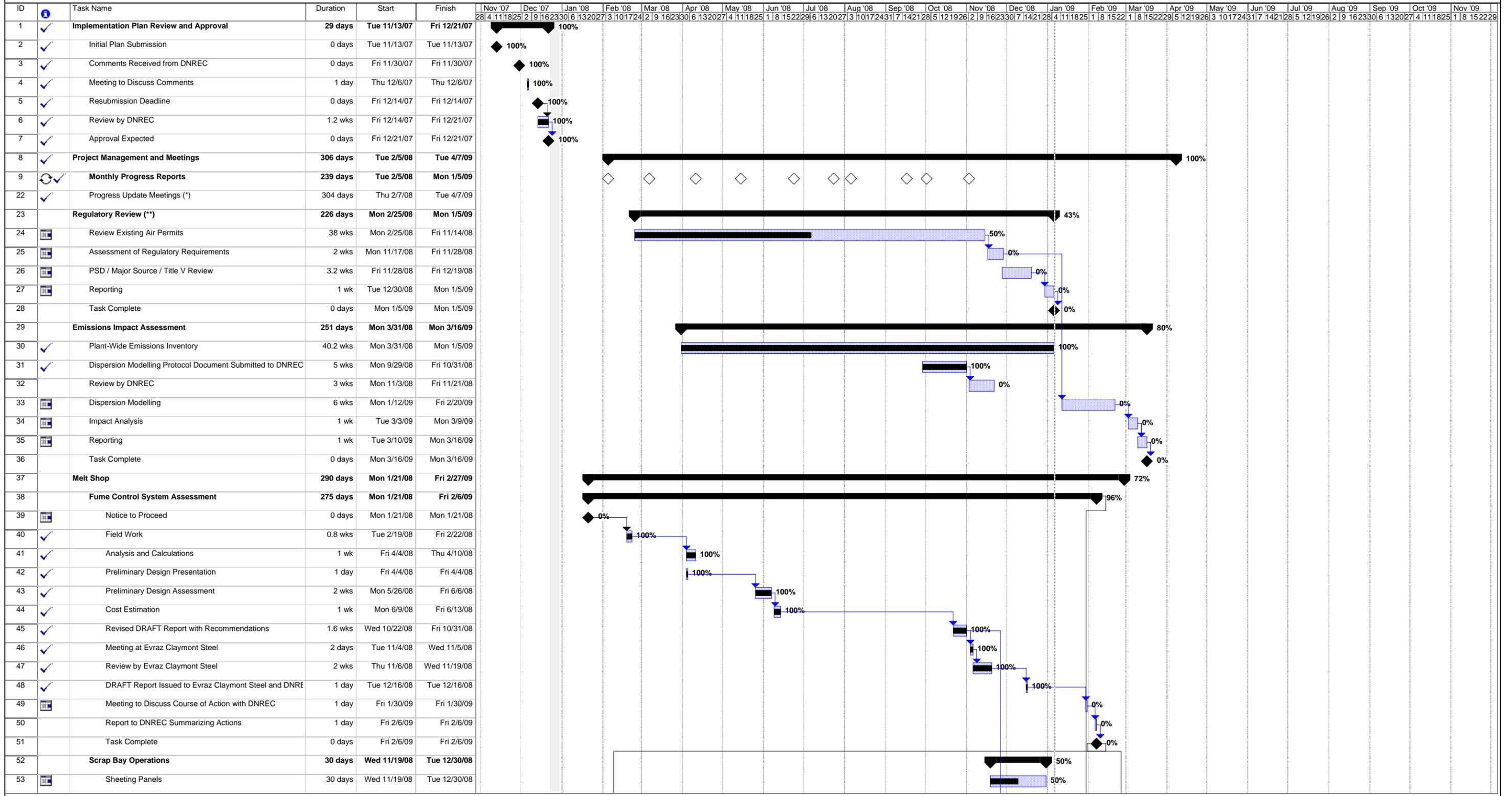
- Sampling will continue every six days at all four monitors.
- Maintenance will be performed on each monitor as required.
- Preliminary data analysis will be undertaken and reported for the first 6 months of operation.

APPENDIX A

Updated Implementation Schedule

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

Update #12
January 6, 2009

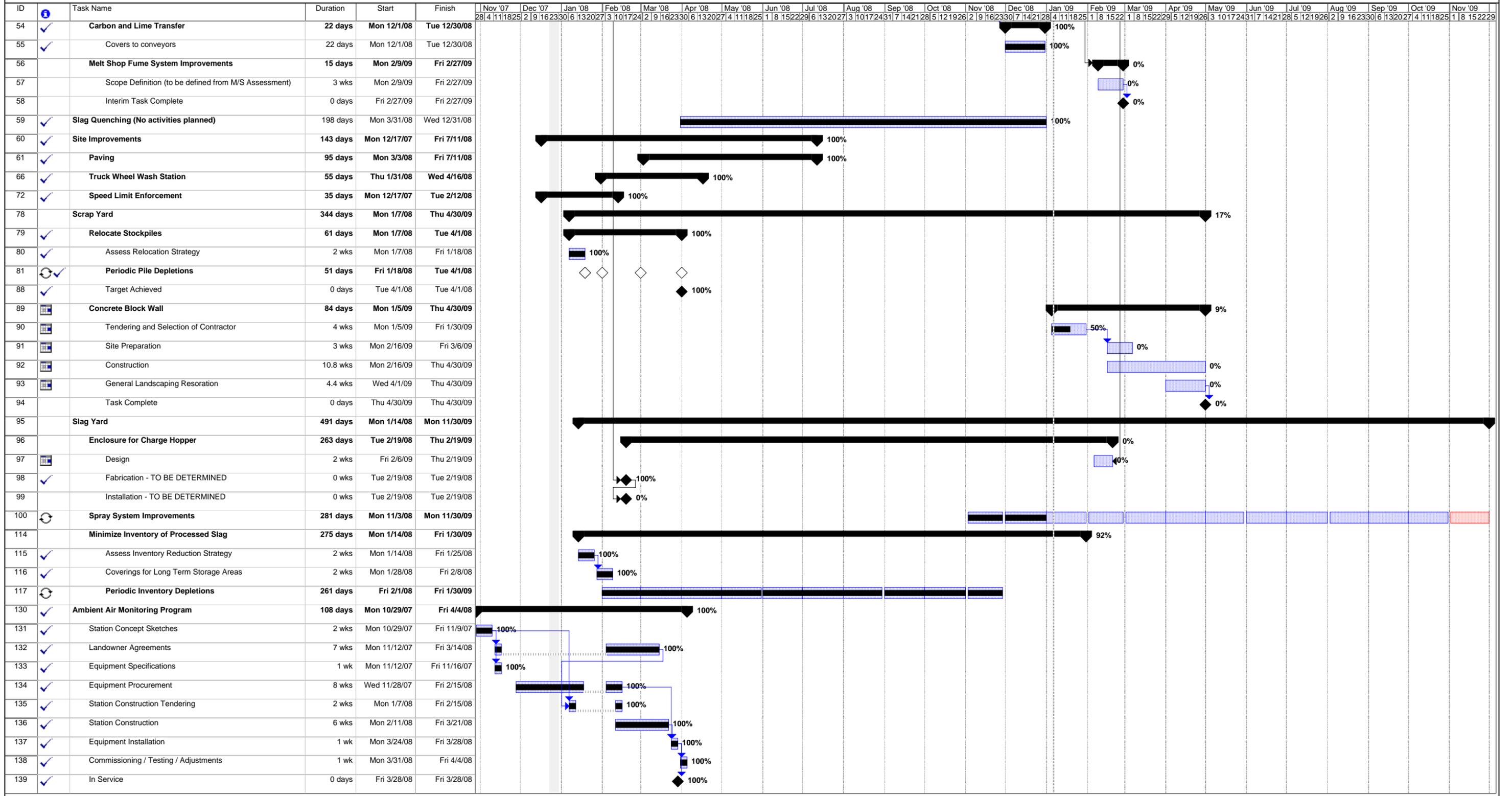


Task Progress Summary Rolled Up Critical Task Rolled Up Progress External Tasks Group By Summary
 Critical Task Milestone Rolled Up Task Rolled Up Milestone Split Project Summary Deadline

Notes:
 (*) - Progress updates consist of periodic conference calls with Evraz Claymont Steel and DNREC.
 (**) - Regulatory review has been delayed.

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

Update #12
January 6, 2009



Task Progress Summary Rolled Up Critical Task Rolled Up Progress External Tasks Group By Summary Deadline

Critical Task Milestone Rolled Up Task Rolled Up Milestone Split Project Summary

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APPENDIX B

Outside Sales Summary

December 2008

DECEMBER 2008 OUTSIDE SALES

SLAG PRODUCED	1401.00
SCARFINGS/MILLSCALE PRODUCED	285.63

Material

Customer	Type of Material	# of Loads	Total tons
Billy Warren	2A	0	0
DSWA Cherry Island	2A	191	4427.84
Claymont Steel	2A	0	0
Ocean Port	2A	17	412.18
W Synder	2A	0	0
Cash Sale	2A	6	139.53
Total			4979.55

Slag

Customer	Type of Material	# of Loads	Total tons
DSWA Cherry Island	2"x4"	45	1057.36
DSWA Sussex	2"x4"		
CitiSteel	2"x4"		
Total			1057.36

Customer	Type of Material	# of Loads	Total tons
DSWA Cherry Island	4+	41	972.53
Total			972.53

Total Tons 7009.44

Material

Customer	Type of Material	# of Loads	Total tons
US Block	1/4"	3	80.92
Lehigh	1/4"	23	557.56
Chesapeake	1/4"	6	129.86
Total			768.34

Scarfings/Millscale

Customer	Type of Material	# of Loads	Total tons
Tubecity Wheeling-Pitt	1/2"x5"		
Tubecity Smith Export	1/2"x5"		
Tubecity Sayreville	4"x8"		
Total			0

Customer	Type of Material	# of Loads	Total tons
Tubecity Fairless	5"-3'		
Tubecity Smith Export	5"-3'		
Total			0

Total Tons 768.34

About AECOM

AECOM (NYSE: ACM) is a global provider of professional technical and management support services to a broad range of markets, including transportation, facilities, environmental and energy. With more than 40,000 employees around the world, AECOM is a leader in all of the key markets that it serves. AECOM provides a blend of global reach, local knowledge, innovation, and technical excellence in delivering solutions that enhance and sustain the world's built, natural, and social environments.

AECOM

105 Commerce Valley Dr. W.
Markham, Ontario L3T 7W3
T 905.886.7200
F 905.886.9494
www.aecom.com