

Evrax Claymont Steel

**Fugitive Dust Control Program
Monthly Progress Report #13
January 2009**

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Table of Contents

1. Introduction	1
2. Update on Project Activities	1
2.1 Project Management and Meetings	1
2.2 Emissions Impact Assessment	1
2.3 Melt Shop	2
2.3.1 Fume Control System Assessment	2
2.3.2 Scrap Bay Operations	2
2.3.3 Carbon and Lime Transfer	2
2.3.4 Fume Control System Improvements	2
2.4 Slag Quenching	3
2.5 Roadways	3
2.5.1 Paving	3
2.5.2 Truck Wheel Wash Station	3
2.5.3 Speed Limit Enforcement	3
2.6 Scrap Yard	3
2.6.1 Relocate Stock Piles	3
2.6.2 Concrete Block Wall	4
2.7 Slag Yard	4
2.7.1 Enclosure for Charge Hopper	4
2.7.2 Spray System Improvements	4
2.7.3 Minimize Inventory of Processed Slag and Scarfing Fines	4
2.8 Ambient Air Monitoring Program	5

Appendices

- A. Updated Implementation Schedule
- B. Outside Sales Summary – January 2009

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

This report covers activities up to January 31, 2009 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

Each section below discusses the project activities that took place in the previous month and highlight where appropriate, the 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 #13 for January 2009 and has been submitted on February 3, 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.
- On-going project management communications took place as scheduled.

Planned Project Activities:

- A meeting will be planned with DNREC and Evraz Claymont Steel to discuss DNREC comments on the draft Melt Shop Fume Control Assessment Report dated December 15, 2008.

2.2 Emissions Impact Assessment

Update on Project Activities:

- This task includes the development of the dispersion modelling protocol document and the planned modelling of emissions.
- Comments on the dispersion modelling protocol document were received from DNREC in January and are currently being reviewed by AECOM.

Planned Project Activities:

- A conference call with DNREC is to be planned for discussing the comments to the dispersion modelling protocol.
- Follow-up information will be gathered and submitted to DNREC regarding the adjustments to the protocol that may be required.
- Dispersion modeling will be conducted upon review and approval of the protocol by DNREC.

2.3 Melt Shop

2.3.1 Fume Control System Assessment

Update on Project Activities:

- The Draft report submitted in December 2008 has been under review by DNREC.

Planned Project Activities:

- Following DNREC's review any comments will be discussed and the report will be revised and finalized as required.

2.3.2 Scrap Bay Operations

Update on Project Activities:

- No activity was planned for this task.

Planned Project Activities:

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

2.3.3 Carbon and Lime Transfer

Update on Project Activities:

- All projects associated with this task have been implemented as of December 2008.

Planned Project Activities:

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

2.3.4 Fume Control System Improvements

Update on Project Activities:

- No activity was planned for this task, pending DNREC review of the Melt Shop Fume Control Assessment Report of December 2008.

Planned Project Activities:

- Action items will be developed based on the results of the DNREC review of the Melt Shop Fume Control Assessment Report of December 2008.

2.4 Slag Quenching

Update on Project Activities:

- No activity was planned for this task.

Planned Project Activities:

- No activity is planned for this task.

2.5 Roadways

2.5.1 Paving

Update on Project Activities:

- No activity was planned for this task.

Planned Project Activities:

- Additional paving will be considered by Evrax Claymont Steel.

2.5.2 Truck Wheel Wash Station

Update on Project Activities:

- Implemented in April 2008. Task complete.

Planned Project Activities:

- No activity is planned for this task.

2.5.3 Speed Limit Enforcement

Update on Project Activities:

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

Planned Project Activities:

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

2.6 Scrap Yard

2.6.1 Relocate Stock Piles

Update on Project Activities:

- No activity was planned for this task.

Planned Project Activities:

- No activity is planned for this task.

2.6.2 Concrete Block Wall

Update on Project Activities:

- Drawings were completed.

Planned Project Activities:

- Construction of the wall is expected to commence in the first quarter of 2009 as soon as the weather permits.

2.7 Slag Yard

2.7.1 Enclosure for Charge Hopper

Update on Project Activities:

- The design was completed during January. Material was ordered and is expected to be delivered during the first week of February.

Planned Project Activities:

- Construction is expected to commence during the second week in February.

2.7.2 Spray System Improvements

Update on Project Activities:

- Upkeep and maintenance of spray systems continue.

Planned Project Activities:

- No further improvements are planned.

2.7.3 Minimize Inventory of Processed Slag and Scarfing Fines

Update on Project Activities:

- January's slag production was 3,593.37 tons from the melt tons produced. The amount of slag material sold in January was 2,656.31 tons. See Appendix B for a detailed summary of slag production and sales values.
- January's scarfing and mill scale production was 863.49 tons. The amount of this material sold in January was 345.01 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.

2.8 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.
- Ambient air data continues to be collected on schedule.

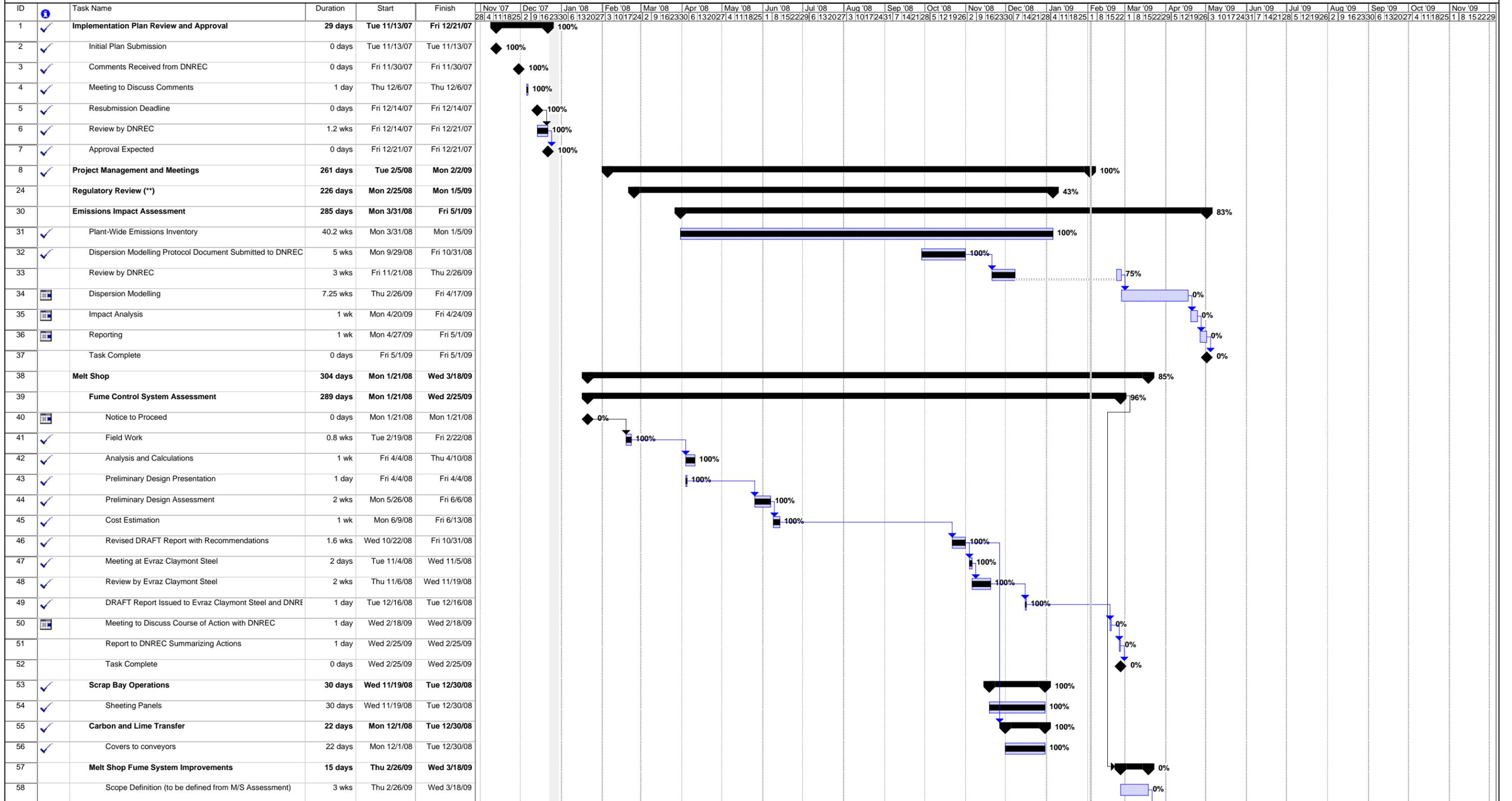
Planned Project Activities:

- Sampling will continue every six days at all four monitors.
- Maintenance will be performed on each monitor as required.
- An interim summary report presenting the ambient air data, meteorology and other relevant sampling data is being prepared. This interim report will cover the period of time from system start-up to December 31, 2008.

Appendix A

Updated Implementation Schedule

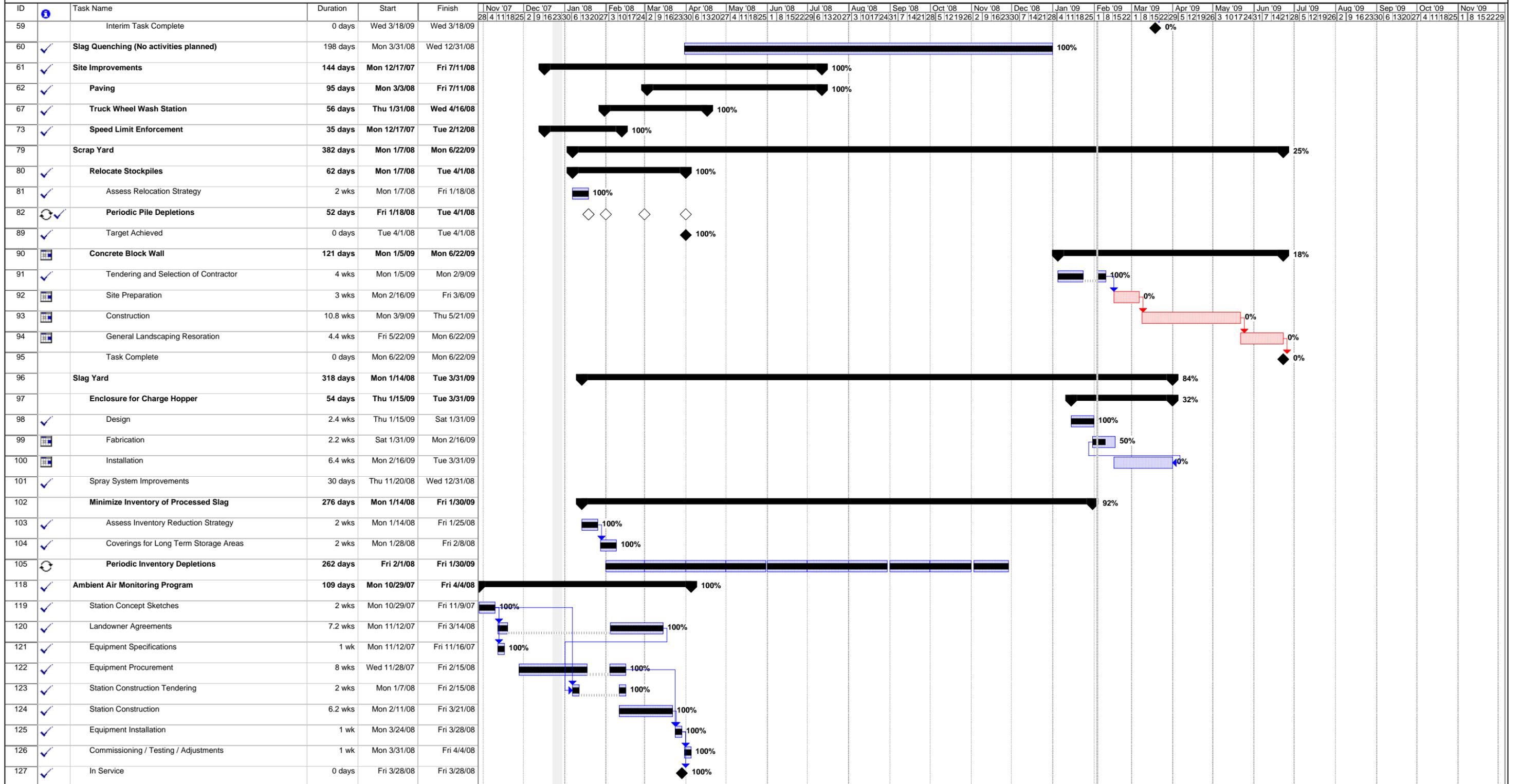
**Evrz Claymont Steel
Implementation Plan
Dust Control Projects**



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**



Task Progress Summary Rolled Up Critical Task Rolled Up Progress External Tasks Group By Summary
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Appendix B

Outside Sales Summary – January 2009

January-09

OUTSIDE SALES

SLAG PRODUCED	3593.37
SCARFINGS/MILLSCALE PRODUCED	863.49

Material

Slag

Customer	Type of Material	# of Loads	Total tons
DSWA Cherry Island	2A	60	1396.16
Total			1396.16

Customer	Type of Material	# of Loads	Total tons
DSWA Cherry Island	2"x4"	46	1066.94
Morris Iron	2"x4"	1	16.99
Total			1083.93

Customer	Type of Material	# of Loads	Total tons
DSWA Cherry Island	4+	8	176.22
Total			176.22

Total Tons 2656.31

Material

Scarfings/Millscale

Customer	Type of Material	# of Loads	Total tons
US Block	1/4"	4	93.37
Lehigh	1/4"	3	73.29
Chesapeake	1/4"	8	178.35
Total			345.01

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

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

Total Tons 345.01