

# Evraz Claymont Steel

## Fugitive Dust Control Program

### Monthly Progress Report #11

### November 2008

**Site:**

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

**Submitted to:**

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December 4, 2008

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

This report covers activities up to November 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.

## 2.0 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 #11 for November 2008 and has been submitted on December 4, 2008. The submission schedule of these progress reports are planned for submission within two to three 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.
- A meeting was held on November 24, 2008 between AECOM and Evraz Claymont Steel to discuss Evraz Claymont Steel comments on the draft Melt Shop Fume Control Assessment Report dated November 17, 2008. In addition, Evraz Claymont Steel identified recent plant improvements to lower dust emissions.

Planned Project Activities:

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

### 2.2 Regulatory Review

Update on Project Activities:

- No activity was planned for this task.

Planned Project Activities:

- This task has been delayed; further activities from this task will continue upon Evraz Claymont Steel approval.

### **2.3 Emissions Impact Assessment**

Update on Project Activities:

- An updated protocol was submitted to Evraz Claymont Steel on October 31, 2008 for submittal to DNREC which identified the scope and approach to the dispersion modeling as previously agreed to by DNREC.

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:

- The draft report of the Melt Shop Fume Control System Assessment dated November 17, 2008 was reviewed by Evraz Claymont Steel. Comments were received on November 24, 2008 and will be incorporated into the Final Report, which will be submitted to DNREC in December.

Planned Project Activities:

- The final version of the report is expected to be completed shortly after Thanksgiving and submitted to DNREC.
- Preliminary design and detailed design will follow at the on-set of Evraz Claymont Steel's and DNREC's approval.

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

Update on Project Activities:

- Evraz Claymont Steel identified complexities with the implementation of this project.
- Evraz Claymont Steel replaced broken or missing building sheeting panels in the Scrap Bay area.

Planned Project Activities:

- Evraz Claymont Steel will be completing placement of sheeting panels in the Scrap Bay area.

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

Update on Project Activities:

- A new baghouse will not be required for this emission source as this has been identified as a maintenance issue with the existing control system.

Planned Project Activities:

- The lime conveyor emissions will be reduced by adding covers to the belts and drops from the hoppers.

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

Update on Project Activities:

- Preliminary design concepts for fume control system improvements have been included in the draft Melt Shop Fume Control System Assessment Report.

Planned Project Activities:

- Preliminary design concepts 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 additional improvement with the wet suppression system was completed.

Planned Project Activities:

- No activity is planned for this task.

#### **2.6 Roadways**

##### **2.6.1 Paving**

Update on Project Activities:

- The roadway from the scarfing baghouse to the scrap yard was graded in preparation for paving.

Planned Project Activities:

- Approximately 35,000ft<sup>2</sup> of road will be paved as part of the fugitive dust control project 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 Tree-lined Berm**

Update on Project Activities:

- Evraz Claymont Steel is planning to construct a concrete block that is 250ft long and 15ft high along Naamans Road.

Planned Project Activities:

- Evraz Claymont Steel is planning to construct a concrete block wall that is 450ft long and 15ft high along Naamans Road.

## **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:

- Evraz Claymont Steel has decided to continue the charge hopper enclosure design 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:

- November's slag production was 2,406.8 tons from the melt tons produced. The amount of slag material sold in November was 3,014.67 tons. See Appendix B for a detailed summary of slag production and sales values.
- November's scarfing and mill scale production was 892.44 tons. The amount of this material sold in November was 650.93 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.

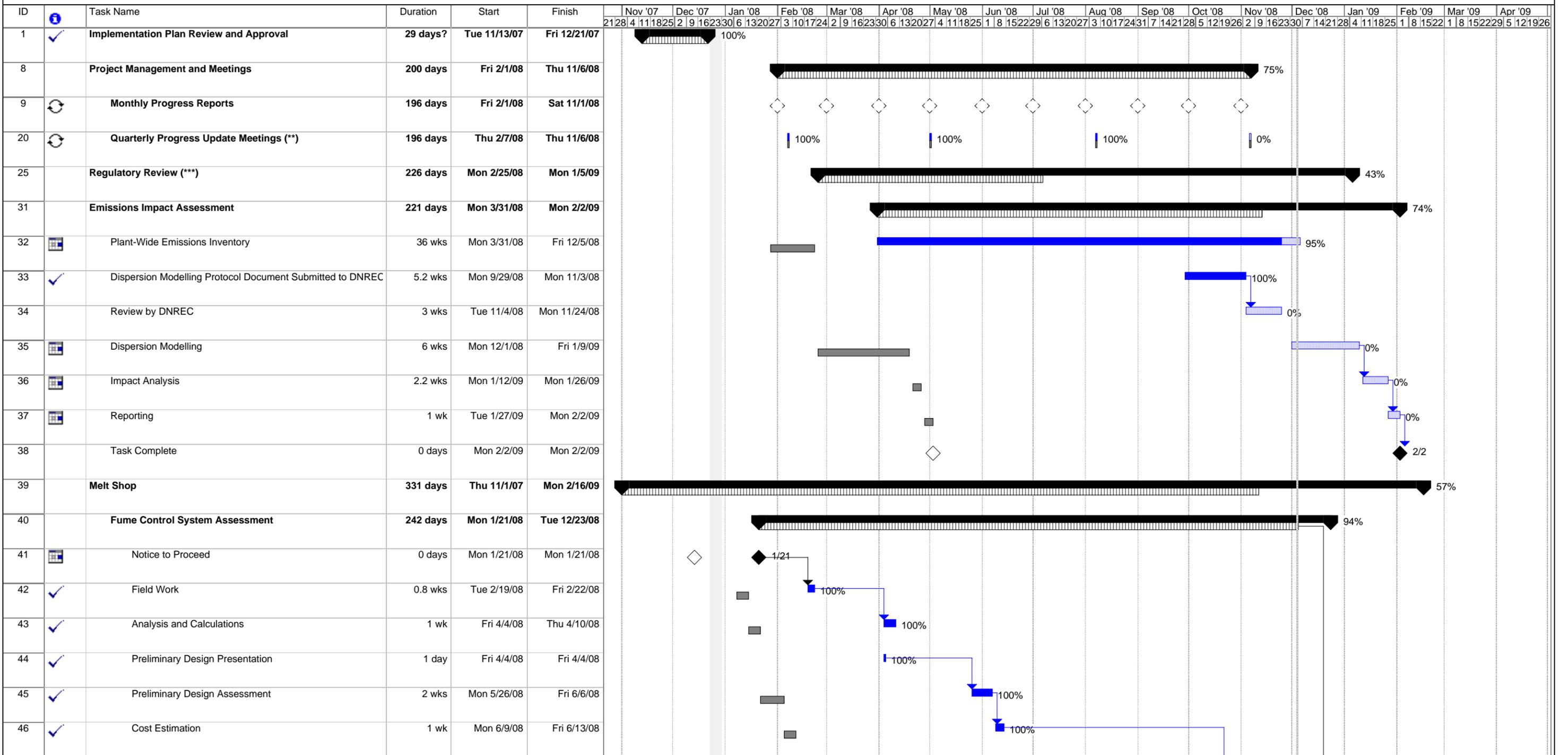
# **APPENDIX A**

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## **Updated Implementation Schedule**

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



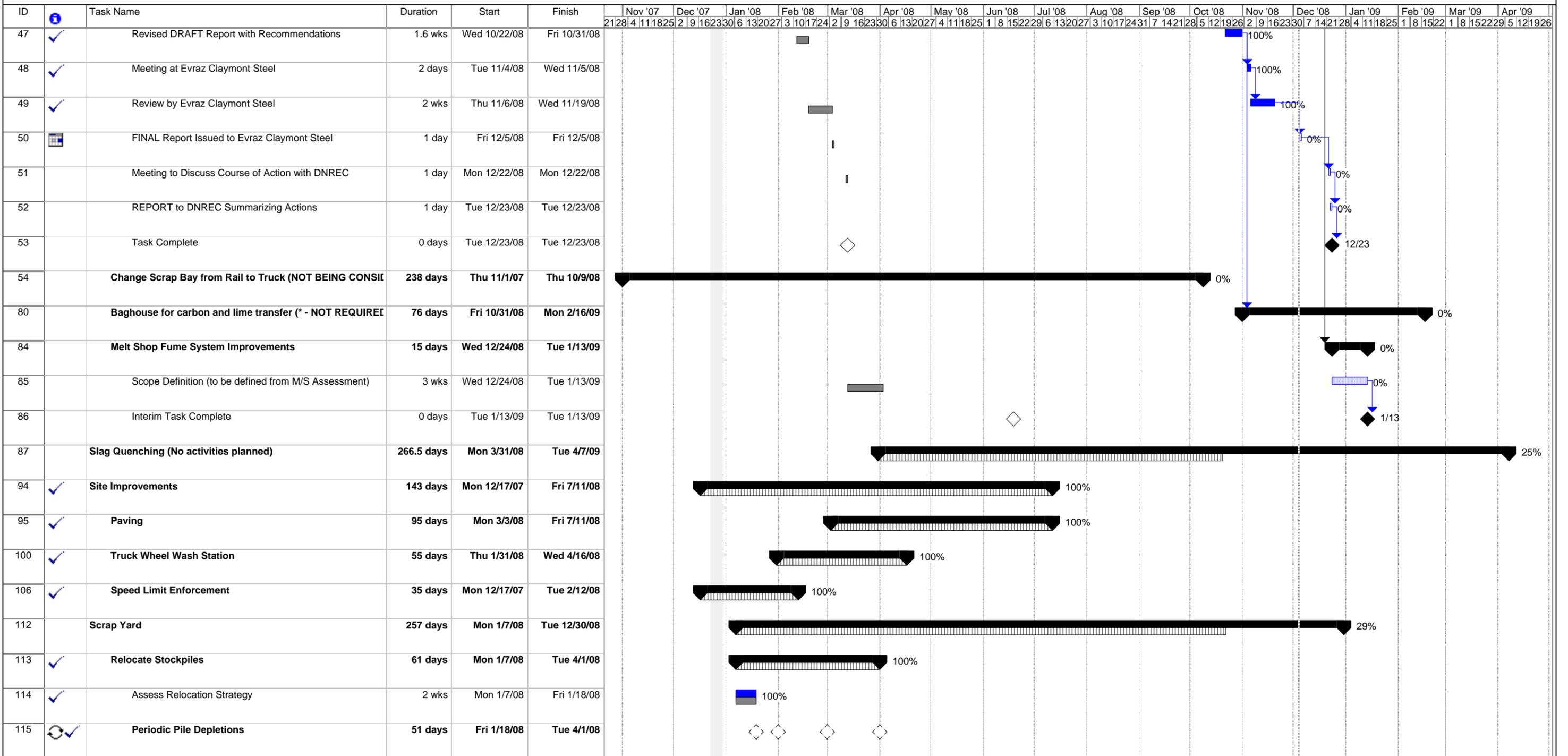
**Earth Tech Inc.**  
Printed: Thu 12/4/08

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			

**Notes:**  
 (\*) - Melt Shop Fume System Assessment did not identify a need for baghouse.  
 (\*\*\*) - Progress updates have been replaced with periodic conference calls to Evraz Claymont Steel and DNREC.  
 (\*\*\*) - Regulatory review has been delayed.

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

Update # 11  
December 4, 2008



<b>Earth Tech Inc.</b> Printed: Thu 12/4/08	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

**Notes:**  
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 (\*\*\*) - Regulatory review has been delayed.

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## **APPENDIX B**

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# **Outside Sales Summary**

## **November 2008**

## NOVEMBER 2008 OUTSIDE SALES

<b>SLAG PRODUCED</b>	2406.80
<b>SCARFINGS/MILLSCALE PRODUCED</b>	892.44

### Material

Customer	Type of Material	# of Loads	Total tons
Billy Warren	2A	0	0.00
DSWA Cherry Island	2A	34	823.00
Claymont Steel	2A	2	54.95
Ocean Port	2A	59	1256.16
W Synder	2A	0	0.00
Cash Sale	2A	1	1.62
<b>Total</b>			<b>2135.73</b>

### Slag

Customer	Type of Material	# of Loads	Total tons
DSWA Cherry Island	2"x4"	30	717.30
DSWA Sussex	2"x4"	1	16.13
<b>Total</b>			<b>733.43</b>

Customer	Type of Material	# of Loads	Total tons
DSWA Cherry Island	4+	6	145.51
<b>Total</b>			<b>145.51</b>

Total Tons      3014.67

### Material

Customer	Type of Material	# of Loads	Total tons
US Block	1/4"	2	52.55
Lehigh	1/4"	15	355.58
Chesapeake	1/4"	11	242.80
<b>Total</b>			<b>650.93</b>

### Scarfigs/Millscale

Customer	Type of Material	# of Loads	Total tons
Tubecity Wheeling-Pitt	1/2"x5"	0	0.00
Tubecity Smith Export	1/2"x5"	0	0.00
Tubecity Sayreville	4"x8"	0	0.00
<b>Total</b>			<b>0</b>

Customer	Type of Material	# of Loads	Total tons
Tubecity Fairless	5"-3'	0	0.00
Tubecity Smith Export	5"-3'	0	0.00
<b>Total</b>			<b>0</b>

Total Tons      650.93

**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.

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