

Evrax Claymont Steel

**Fugitive Dust Control Program
Monthly Progress Report #14
February 2009**

Prepared by:

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Revision Log

Revision #	Revised By	Date	Issue / Revision Description
0	WRA	March 2009	Original

Signature Page

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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 (ECS) 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 February 28, 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 #14 for February 2009 and has been submitted on March 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 is planned for March 10, 2009 with DNREC and Evraz Claymont Steel to discuss the draft Melt Shop Fume Control Assessment Report dated December 15, 2008 and other items.

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.
- DNREC comments on the dispersion modelling protocol were discussed with Evraz Claymont Steel and AECOM.

- A revised protocol document was submitted to DNREC incorporating many of these comments, on February 27, 2009.

Planned Project Activities:

- 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 remains 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 Evraz 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 Evraz Claymont Steel security.

Planned Project Activities:

- On-going enforcement will be carried out by Evraz 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 in February.
- A contractor has been selected and construction will commence as soon as weather permits.

Planned Project Activities:

- Construction of the wall is expected to commence in the first quarter of 2009 as soon as the weather permits. Completion is projected by the end of June 2009

2.7 Slag Yard

2.7.1 Enclosure for Charge Hopper

Update on Project Activities:

- The material for the charge hopper enclosure was delivered in late February

Planned Project Activities:

- Construction is expected to commence during early March and be complete by Mid March, weather permitting.

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:

- February's slag production was 2,863.42 tons from the melt tons produced. The amount of slag material sold in February was 6,539.05 tons. See Appendix B for a detailed summary of slag production and sales values.
- February's scarfing and mill scale production was 685.53 tons. The amount of this material sold in February was 172.14 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:

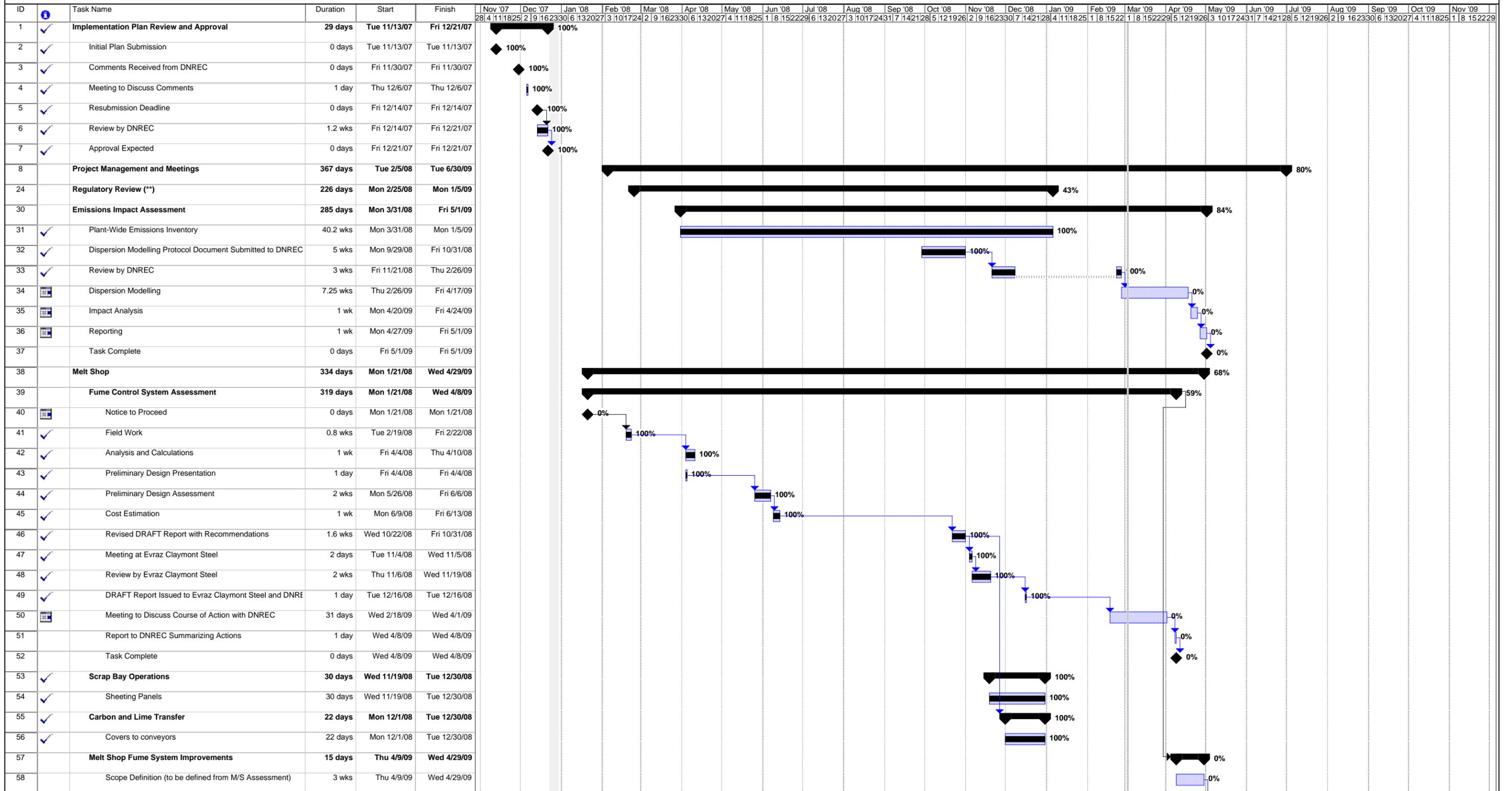
- Sampling will continue every six days at all four monitors.
- Maintenance will be performed on each monitor as required.
- An interim summary report presenting the ambient air data, meteorology and other relevant sampling data was prepared. This interim report covered the period of time from system start-up in March 2008 to December 31, 2008. This report was submitted to DNREC on February 10, 2009.

Appendix A

Updated Implementation Schedule

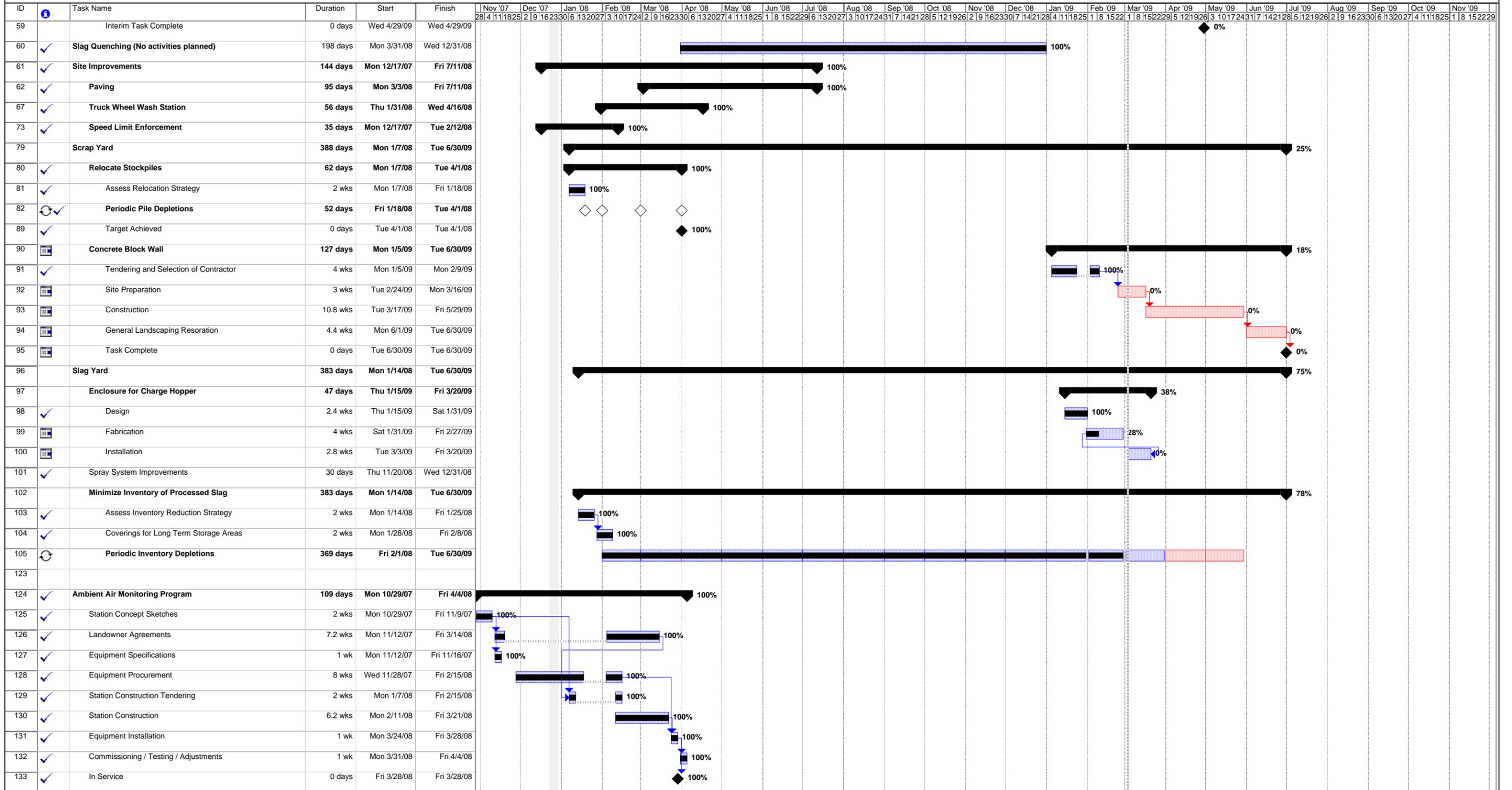
Evraz Claymont Steel Implementation Plan Dust Control Projects

Update #14
March 3, 2009



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
 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.

Appendix B

Outside Sales Summary – February 2009

February-09

OUTSIDE SALES

SLAG PRODUCED	2863.42
SCARFINGS/MILLSALE PRODUCED	685.53

Material

Customer	Type of Material	# of Loads	Total tons
DSWA Cherry Island	2A	149	3371.91
Cash	2A	6	146.22
	2A		
Total			3518.13

Slag

Customer	Type of Material	# of Loads	Total tons
DSWA Cherry Island	2"x4"	111	2615.01
Total			2615.01

Customer	Type of Material	# of Loads	Total tons
DSWA Cherry Island	4+	18	405.91
Total			405.91

Total Tons 6539.05

Material

Customer	Type of Material	# of Loads	Total tons
US Block	1/4"	3	59.11
Lehigh	1/4"	1	23.36
Chesapeake	1/4"	4	89.67
Total			172.14

Scarfings/Millsale

Customer	Type of Material	# of Loads	Total tons
Tubecity Wheeling-Pitt	1/2"x5"	0	0
Tubecity Smith Export	1/2"x5"	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 172.14