



A Tyco International Ltd. Company

# CLAYMONT STEEL INC.

**FUGITIVE DUST CONTROL  
MONTHLY PROGRESS REPORT #5**

**May 2008**

*Prepared for:*

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June 1, 2008

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 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 May 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 UPDATE ON PROJECT ACTIVITIES FOR CURRENT MONTH**

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

- This report is Progress Report #5 for May 2008 and has been submitted on the planned submission date of June 1, 2008.

### **2.2 REGULATORY REVIEW**

- Regulatory requirements are being assessed, and PSD, major source and Title V permits are currently being reviewed to establish the framework for any new permits for new sources of air emissions that need to be developed. The review ensures that all current documentation and emissions estimates are included.

### **2.3 EMISSIONS IMPACT ASSESSMENT**

- No activity was planned for this task.

### **2.4 MELT SHOP**

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

- A site visit is no longer necessary to complete the fume control system assessment. The assessment has started and will be completed in the month of June. Additional information is required such as damper positions and control strategy. This will be requested to Claymont.

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

- Evraz (new owners) are reviewing and planning capital expenses associated with this project.
- Status of approval by Board of Directors – Evraz is reviewing the planning and capital expenses with their board.
- Final equipment specifications will be provided upon the board's approval.

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

- No activity was planned for this task. Fume assessment study will dictate the need for this activity.

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

- No activity was planned for this task.
- This task will be further defined following completion of the melt shop fume system assessment.

#### **2.5 SLAG QUENCHING**

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

#### **2.6 ROADWAYS**

##### **2.6.1 Paving**

- Re-evaluating the old specification; new specification will be added.

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

- Wash system installed and operational. Working on additional modifications to ensure that drivers do not hit the unit as is happening with current setup.

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

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

#### **2.7 SCRAP YARD**

##### **2.7.1 Relocate Stockpiles**

- Periodic pile relocation continued.
- Target achieved.

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

- Area for this activity was prepared.

#### **2.8 SLAG YARD**

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

- Charge hopper enclosure is now moving into the fabrication stage.

### **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**

- May's slag production was 7,200 tons from the melt tons produced. Of the amount produced, 9,210.45 tons of slag was sold. Net reduction of inventory by 2,010.45 tons. See Appendix B for detailed summary of slag sales.
- May's scarfing production was 2,250 tons from the melt tons produced. Of the amount produced, 4,395.22 tons of scarfing was sold. Net reduction of inventory by 2,145.22 tons. See Appendix B for detailed summary of scarfing sales.

## **2.9 AMBIENT AIR MONITORING PROGRAM**

- The fourth and final monitor location has been established as the roof top of the discount liquor store at the Tri State Mall.
- Installation of the fourth monitor was completed on May 7, 2008. After discussing several options for bringing electricity to the roof top with the property owners, the electrical connections were completed on May 21, 2008. Delmarva inspected and certified the work on May 23, 2008. The monitor will be in operation as soon as Delmarva Power installs the meter and turns on the power. This is anticipated to be done the first week of June.

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

The following work is planned for the next month:

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

- Progress Report #6 for June 2008 will be submitted on July 2, 2008, since July 1, 2008 is a National holiday in Canada.
- A quarterly progress meeting is requested to be held in June as the scheduled quarterly progress meeting in May was not held. Confirmation of timing will follow.

#### **3.2 REGULATORY REVIEW**

- Regulatory review reporting will be completed following the completion of regulatory requirements assessment and PSD, major source and Title V review.

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

- An air dispersion model will be set up with all significant sources of fugitive dust identified for the melt shop from the emission inventory. The air dispersion model will be used to predict expected impact reductions for each project and will be incorporated into the progress tracking process.
- Following completion of the model, impact analysis will be performed.

#### **3.4 MELT SHOP**

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

- Design concepts for new controlled sources of air emissions required to control fugitive dust emissions will be developed. These items will be discussed in the Melt Shop Fume Control Assessment Report.
- Analysis and preliminary design will be on-going in June. The report is expected to be completed in June.

##### **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**

- No work is planned for June.
- The details of the requirements for this work will be defined by the melt shop fume control system assessment.

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

- Design concepts for fume control system improvements will be included in the Melt Shop Fume Control Assessment Report.

## **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 dependant upon the final decision of whether this operation will be moved into the melt shop scrap bay area.
- Working on nozzle review and if additional measures are needed.

## **3.6 ROADWAYS**

### **3.6.1 Paving**

- Revised quotation expected from contractors.
- Paving expected to begin in June

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

- Preparation of the area will continue for this activity.

## **3.8 SLAG YARD**

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

- Charge hopper is now moving into fabrication stage.

### **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 June.

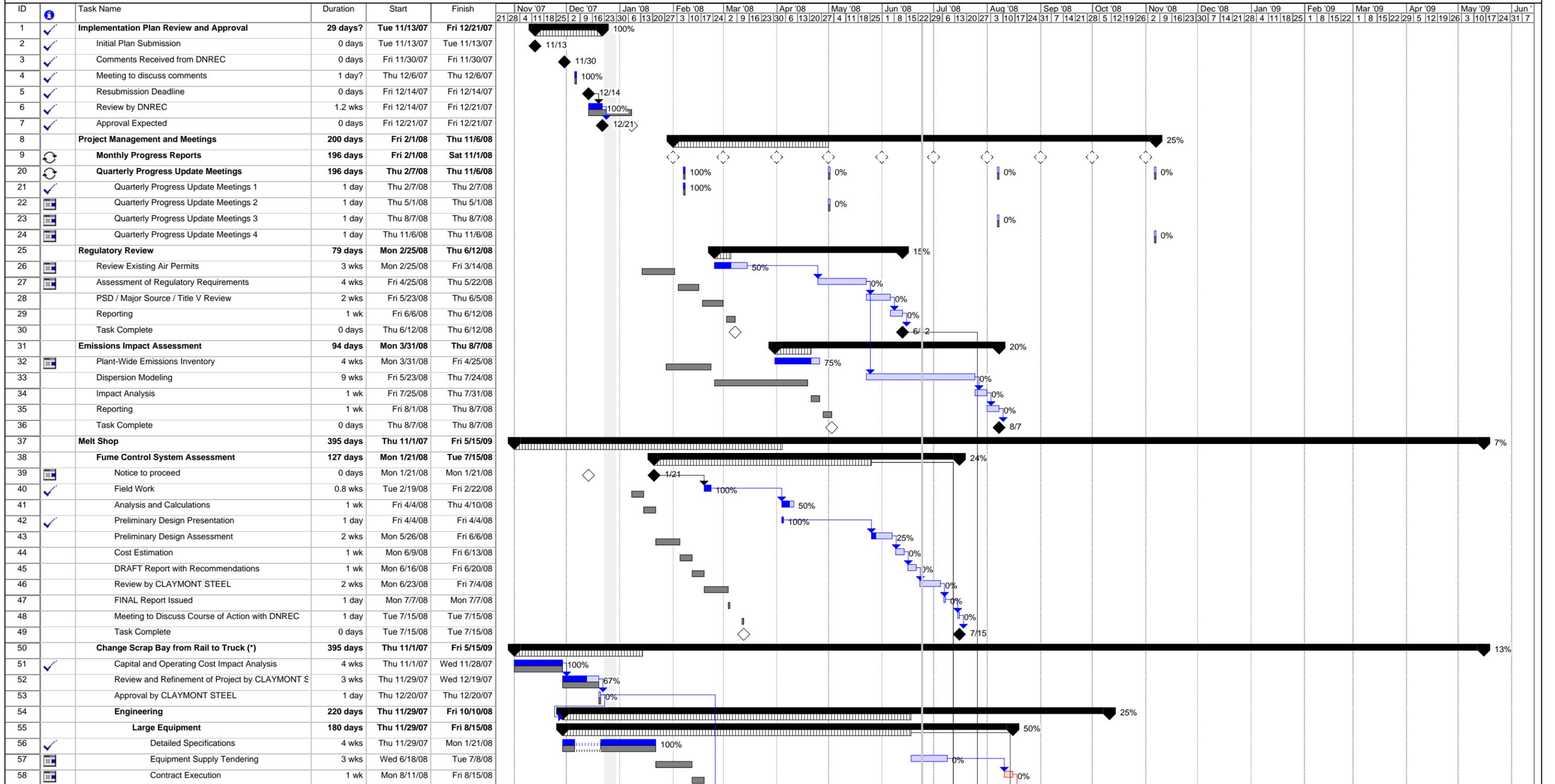
# **APPENDIX A**

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## **Updated Implementation Schedule**

**Claymont Steel  
Implementation Plan  
Dust Control Projects**

Update # 5  
June 1, 2008



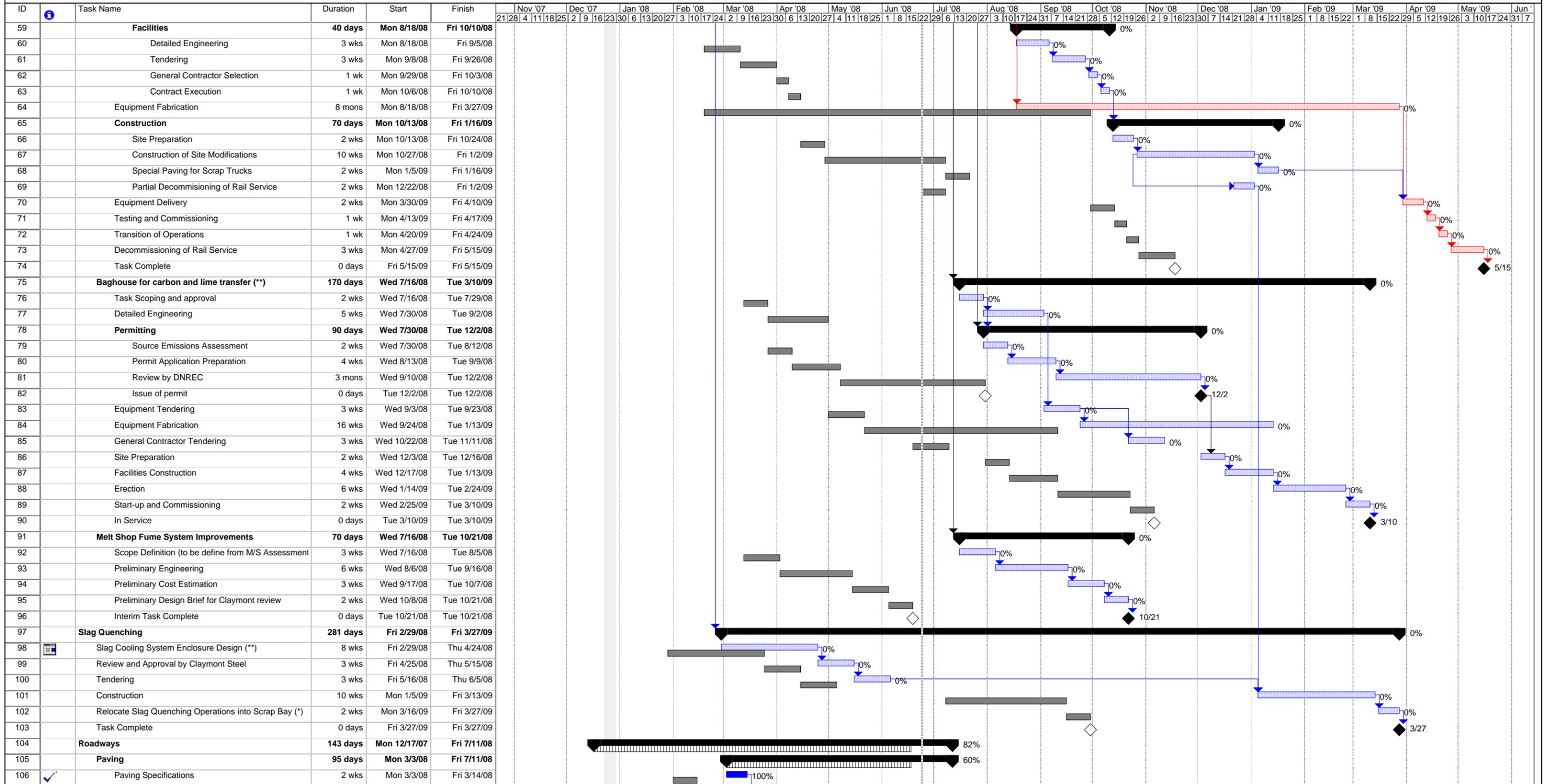
Earth Tech Inc.  
Printed: Tue 6/24/08



**Notes:**  
(\*) - Subject to approval of "Rubber Tire" project by Claymont Steel  
(\*\*) - Subject to outcome of melt Shop Fume System Assessment

**Claymont Steel  
Implementation Plan  
Dust Control Projects**

Update # 5  
June 1, 2008



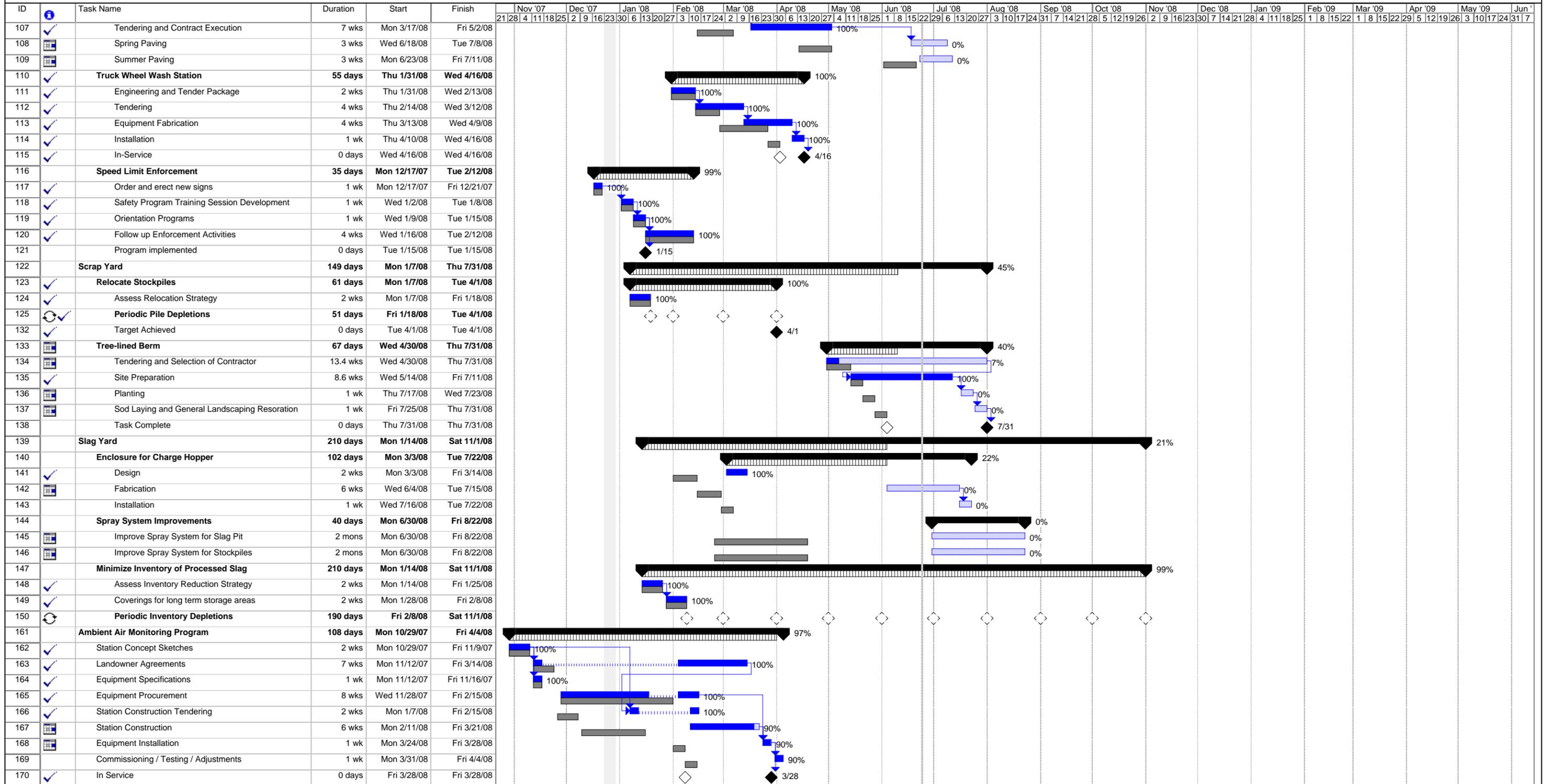
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**Claymont Steel  
Implementation Plan  
Dust Control Projects**

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**Notes:**  
(\*) - Subject to approval of "Rubber Tire" project by Claymont Steel  
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# **APPENDIX B**

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## **Outside Sales Summary**

**May 2008**

