

Evrax Claymont Steel

**Fugitive Dust Control Program
Monthly Progress Report #16
April 2009**

Prepared by:

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Revision Log

Revision #	Revised By	Date	Issue / Revision Description
0	WRA	May 05, 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 April 30, 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 #16 for April 2009 and has been submitted on May 05, 2009. The submission schedule of these progress reports are planned for submission within a few 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.

Planned Project Activities:

- Ongoing client communications.

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.
- Following the receipt of comments received from DNREC on April 2, 2009, a modeling protocol document Revision 02 was submitted on April 16 and is currently under review by DNREC.

Planned Project Activities:

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

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, the opportunities for and feasibility of future dust control measures associated with the Melt Shop will be discussed with DNREC.

2.3.2 Scrap Bay Operations

Update on Project Activities:

- No additional 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:

- No additional activity was planned for this task.

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 additional activity was planned for this task. Any future Fume Control System Improvements will be discussed with DNREC following their review of the Melt Shop Fume Control Assessment Report of December 2008.

Planned Project Activities:

- Additional action items will be developed based on discussions with DNREC following their review of the Melt Shop Fume Control Assessment Report of December 2008.

2.4 Slag Quenching

Update on Project Activities:

- No additional activity was planned for this task.

Planned Project Activities:

- No additional activity is planned for this task.

2.5 Roadways

2.5.1 Paving

Update on Project Activities:

- No additional activity was planned for this task.

Planned Project Activities:

- No additional activity is planned for this task

2.5.2 Truck Wheel Wash Station

Update on Project Activities:

- No additional activity was planned for this task.

Planned Project Activities:

- No additional activity is planned for this task.

2.5.3 Speed Limit Enforcement

Update on Project Activities:

- On-going enforcement and monitoring has been 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 additional activity was planned for this task.

Planned Project Activities:

- No additional activity is planned for this task.

2.6.2 Concrete Block Wall

Update on Project Activities:

- Project has been postponed pending a review of other dust control systems development.

Planned Project Activities:

- No additional activity is planned for this task

2.7 Slag Yard

2.7.1 Enclosure for Charge Hopper

Update on Project Activities:

- No additional activity was planned for this task.

Planned Project Activities:

- No additional activity is planned for this task.

2.7.2 Spray System Improvements

Update on Project Activities:

- Upkeep and maintenance of spray systems continue.

Planned Project Activities:

- No additional improvements are planned.

2.7.3 Minimize Inventory of Processed Slag and Scarfing Fines

Update on Project Activities:

- April slag production was 1829 tons from the melt tons produced. The amount of slag material sold in April was 5710 tons. See Appendix B for a detailed summary of slag production and sales values.
- April scarfing and mill scale production was 308 tons. The amount of this material sold in April was 559 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 continues to maintain the monitors. The monitors sample every 6th day.
- Ambient air data continues to be collected on schedule.

Planned Project Activities:

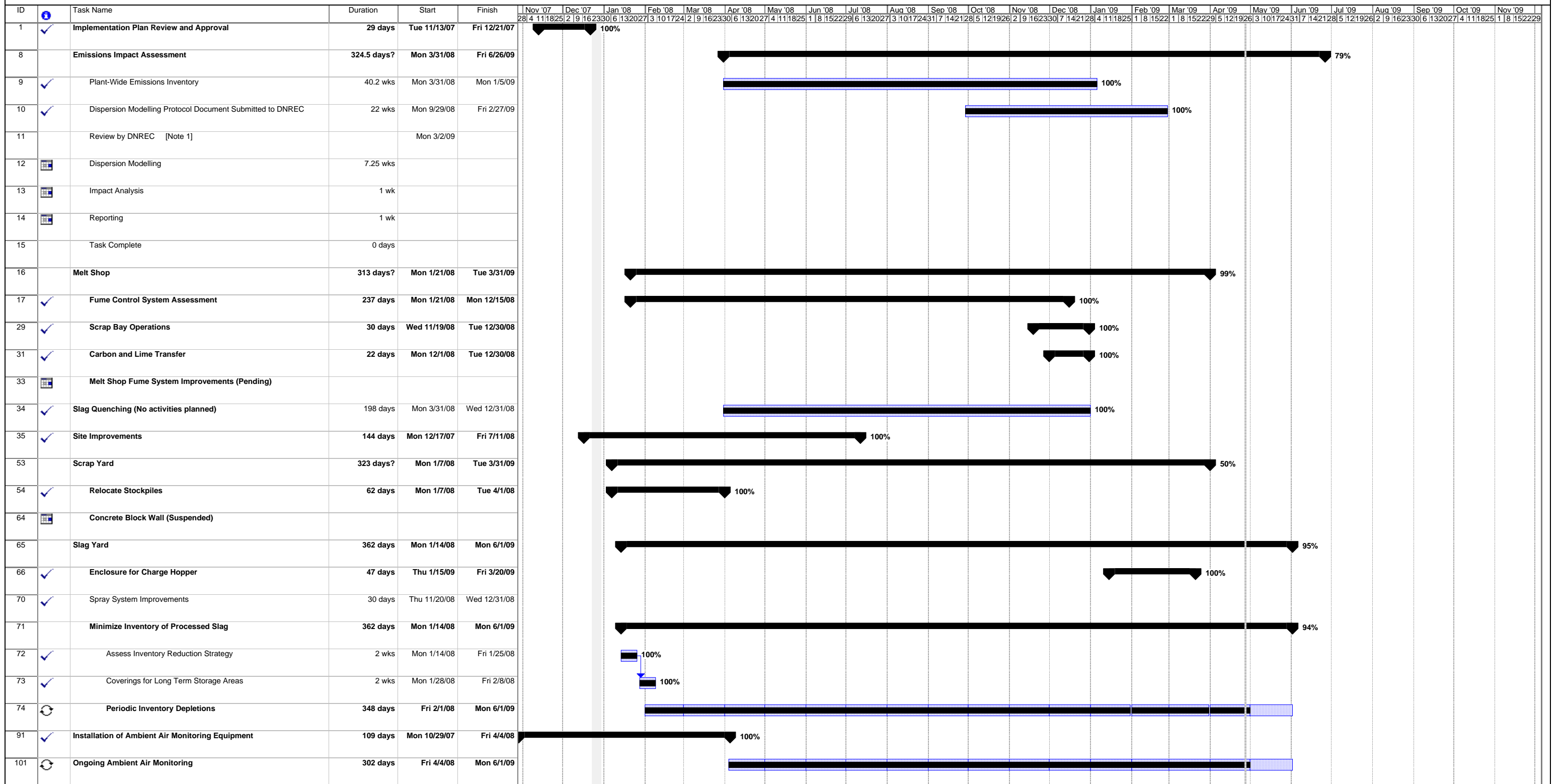
- Sampling will continue every six days at all four monitors.

- Maintenance will be performed on each monitor as required.

Appendix A

Updated Implementation Schedule

**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:
[1] Projected dates associated with subsequent tasks are dependant on the completion of the DNREC review of the Dispersion Modelling Protocol Document.

Appendix B

Outside Sales Summary – April 2009

April-09

OUTSIDE SALES

SLAG PRODUCED	1829.00
SCARFINGS/MILLSALE PRODUCED	307.56

Material

Customer	Type of Material	# of Loads	Total tons
DSWA Cherry Island	2A	162	3664.55
Cash	2A	3	70.74
LRC	2A	2	47.39
Total		167	3782.68

Slag

Customer	Type of Material	# of Loads	Total tons
DSWA Cherry Island	2"x4"	75	1733.10
Total		75	1733.10

Customer	Type of Material	# of Loads	Total tons
DSWA Cherry Island	4+	9	193.86
Total		9	193.86

Total Tons 5709.64

Material

Customer	Type of Material	# of Loads	Total tons
Lehigh	1/4"	3	75.18
Chesapeake	1/4"	22	483.82
Total		25	559.00

Scarfigs/Millsale

Customer	Type of Material	# of Loads	Total tons
	1/2"x5"		
Total		0	0

Customer	Type of Material	# of Loads	Total tons
	5'-3'		
Total		0	0

Total Tons 559.00