

14 December 2007

Project: 98250

Mr. Brian Houghton
Claymont Steel
4001 Philadelphia Pike
Claymont, Delaware
19703

Subject: Revised Schedule for Fugitive Dust Control Implementation Plan

Dear Brian:

Further to our meeting with the Department of Natural Resources and Environmental Control (DNREC), Claymont Steel and Earth Tech, please find attached a revised schedule for the Implementation Plan as required by DNREC's letter of November 30.

The general concerns raised by DNREC regarding the level of detail and the inclusion or regularly scheduled progress report submissions have been included in the revised schedule. Each of the specific concerns raised regarding the various dust control projects and facility areas have also been addressed. Specifically:

General

- Progress tracking has been included on a monthly basis
- Air permit applications and definition of regulatory requirements have been added

Melt Shop

- Based on the stated fabrication and delivery schedule for the specialized equipment required for this project (8 months) and the necessary equipment specification, supplier selection and facility construction, the original timeframe for implementation is reasonable. Additional detail has been added to show the various steps required and their interdependency.
- The need for a baghouse for the carbon and lime storage facilities can only be confirmed after the melt shop assessment is complete. If required, the development of the engineering and specifications required to tender the contract for this equipment and the fabrication time leads to a late fall completion of this project. The additional detail is presented in the revised schedule showing the various steps and interdependency leading to the design, permitting and installation of the baghouse.

Slag Quenching

- If the "Rubber Tire" project is approved, the relocation of the slag quenching operation and the enclosure required for this operation will need to be staged such that the scrap bay area and the new scrap loading operation is in place before the slag quenching station can be relocated. The detail is presented in the schedule. It is possible to accelerate this project with a planned implementation in late September 2007. This is approximately a 6 week reduction in implementation time.

Roadways

- Based on the detail provided in the revised schedule, a 2 month time frame for implementing the truck wheel wash station is required. This has been scheduled so that it will be available in early April 2008 when it again becomes feasible to wash truck wheels safely to avoid ice build-up and potential brake failure.
- The speed limit training and enforcement program will be put in place as soon as possible. Stated speed limits of 10 mph have already been put in place and the full safety orientation and training program executed by mid January 2008. An increased enforcement and monitoring period will follow to ensure adherence to the new policies. This is then expected to be an on-going monitoring program associated directly with the safety initiatives at Claymont Steel.

Scrap yard

- Planting of trees for the tree-lined berm will begin as soon as the spring planting season arrives. It is estimated that this will be in early May, but could be earlier based on the professional advice from the supplier.

Slag yard

- As discussed with DNREC, the slag storage inventory is expected to be depleted on a regular and on-going basis. This will begin as soon as possible and will be monitored and reported on a monthly basis. This detail has been added to the revised schedule.

Ambient Air Monitoring Program

- Tracking of progress in setting up the ambient air monitoring program has begun and significant elements of the project are under way.

We expect that this revised schedule will be reviewed by DNREC to ensure that their specific concerns have been addressed and that, in general the level of additional detail meets their expectations. Please let me know if there are comments that need to be incorporated into the revised schedule or the supporting text and we will provide those as soon as possible. We will update the text of the Implementation Plan to reflect the additional detail upon confirmation from DNREC that the revised schedule meets their needs.

We are under the assumption that this submission will meet the requirements of the December 14, deadline referred to in DNREC's letter of November 30. If further information is required, please do not hesitate to contact me directly.

Very truly yours,
Earth Tech Inc.



William Allan, P.Eng.
Manager, Air Quality Engineering