GERDAU AMERISTEEL

February 29, 2012 via Certified Mail

Environmental Protection Agency
Office of Federal Activities
International Compliance Assurance Division (2254A)
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

RE: EPA Annual Report, Hazardous Waste Exports for Calendar Year 2011
Chaparral (Virginia) Inc.
EPA I.D. No. VAR000013292

Dear Sir/Madam,

In accordance with Section 3017 of the Resource Conservation and Recovery Act (RCRA), please find enclosed a copy of the Chaparral (Virginia) Inc.'s Annual Hazardous Waste Exports Report for calendar year 2011.

If you have questions concerning the attached report, please feel free to contact me at my office telephone number, (804) 524-2837.

Respectfully,

MALACHY DONOHUE

Malachy Donohue
Environmental Manager

Enclosure

25801 Hofheimer Way • Petersburg, Virginia 23803 • (804) 520-0286 • Fax (804)524-2822

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TO:

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Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

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ANNUAL REPORT OF HAZARDOUS WASTE EXPORTS FOR 2011

PRIMARY EXPORTER (Consignor)

EPA ID#:	VAR000013292
Name:	Chaparral (VA) Inc.
Address:	25801 Hoffheimer Way Petersburg, VA 23803

CONSIGNEE (Foreign Receiving Facility)

Name:	Zinc Nacional, S.A.
Site Address:	Hidalgo 674 Pte., Apdo 985 Monterrey, N.L., Mexico 64000

TRANSPORTERS

Transporter No. 1:	Norfolk Southern Railway Company
EPA ID#:	VAD000650309
Transporter No. 2:	Burlington Northern Santa Fe Railway
EPA ID#:	MND048341788

WASTE INFORMATION

Description of Waste:	Emission Control Dust/Sludge from Primary Production Of Steel in Electric Furnaces
EPA Waste ID#:	K061
DOT PSN:	NA 3077, Hazardous Waste Solid, n.o.s. (K061), 9, III, RQ
DOT Hazard Class:	9

SHIPPING INFORMATION

Total amount of this waste shipped:	1,178 tons
Number of shipments in 2011	12

WASTE MINIMIZATION STATEMENT

Chaparral (VA) Inc. has prepared and implemented a waste minimization program with the intent of reducing the volume and toxicity of wastes generated. The Waste Minimization Program includes:

- Designation of a Waste Minimization Coordinator
- Waste Minimization Goals
- Waste Stream Characterization
- Elimination
- Substitution
- Waste auditing
- Waste Management Control

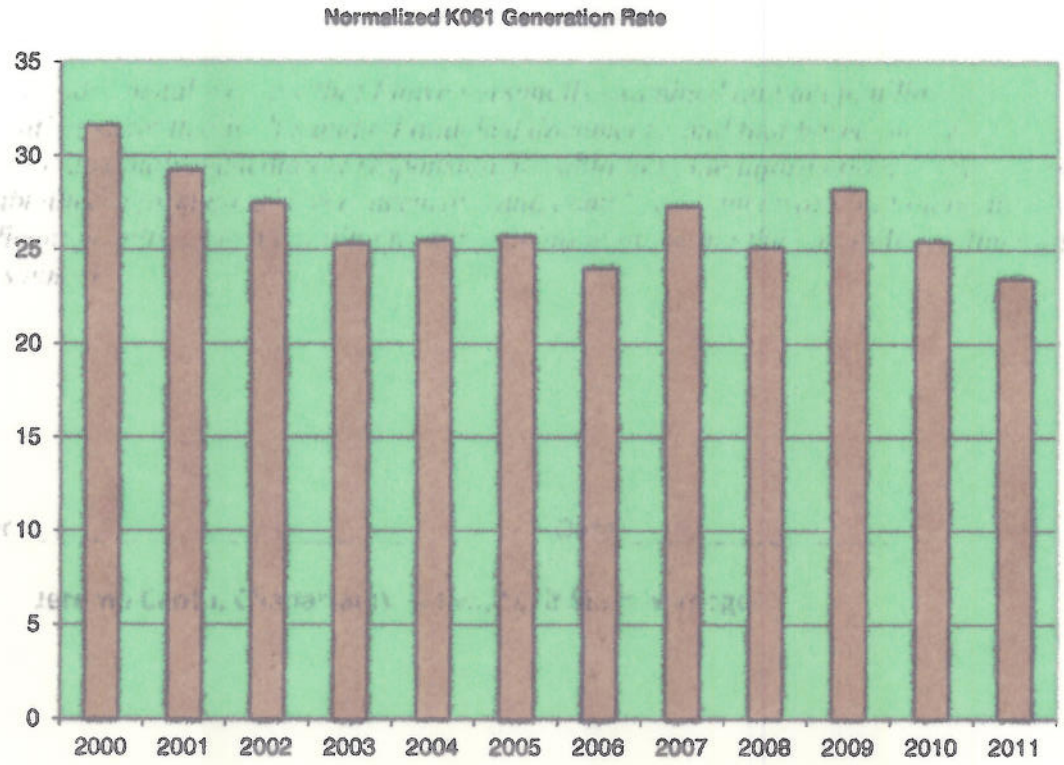
The RCRA listed waste generated from the air emission pollution control device (positive pressure filtration) is designated by the EPA as K061 listed waste. This listed waste contains a wide variety of metals that were captured by the pollution control device (bag house filters) in the air exhaust stream. The electric arc furnace (EAF) dust captured by the filters is rich in metals specifically zinc along with iron and to a lesser extent cadmium, copper and lead along with trace amounts of other metals.

The secondary recovery of these metals from the waste before analytical testing and proof the waste meets K061 treatment standards is an example of the recycling and reuse of recovered metals from discarded iron and steel that serves as the basis for scrap metals which are smelted in the EAF that produces the baghouse, K061 listed waste.

Table 1. *Quantity of Exported Waste in Comparison to the Normalized Steel Production Rate* shows that since 1999 the rate of steel exported compared to steel produced has dropped steadily over time with minor fluctuations based upon market economies. What remains constant is the extraction of as much metal as feasibly possible to beneficially use scrap steel to produce new iron and steel products as well as recovering to the extent practical the zinc, copper and other metals found in the dusts trapped by pollution control device filters to efficiently and effectively preserve resources.

Table 1., *Quantity of Exported Waste in Comparison to the Normalized Steel Production Rate*

Year	Waste Code	Amount Exported, tons	Normalized Generation Rate, lbs exported/ton of steel produced
1999	K061	1,160	(startup-year)
2000	K061	8,328	31.6
2001	K061	7,763	29.2
2002	K061	8,357	27.5
2003	K061	8,099	25.3
2004	K061	9,654	25.5
2005	K061	10,258	25.7
2006	K061	11,070	24.0
2007	K061	13,012	27.3
2008	K061	9,329	25.1
2009	K061	5,924	28.2
2010	K061	7,295	25.4
2011	K061	1,178	23.4


Normalized K061 Generation Rate
35
30
25
20
15
10
5
0
2000
2001
2002
2003
2004
2005
2006
2007
2008
2009
2010
2011

CERTIFICATION:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fines and imprisonment.

Signed: Jerome R. Cantu Date: 03/01/2012

Jerome Cantu, Chaparral (VA) Inc., Melt Shop Manager