GERDAU

February 23, 2018

Office of Enforcement and Compliance Assurance
Office of Federal Activities
International Compliance Assurance Division (2254A)
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

CERTIFIED MAIL

RE: Annual Hazardous Waste Export Report

Please find attached our Annual Hazardous Waste Export Report as required under 40 CFR 262.56. Should you require any additional information, please contact me at the address or phone numbers listed below.

Sincerely,

Lisa Overton

Lisa Overton
Environmental Specialist
Fort Smith Mill
Gerdau Special Steel North America
5225 Planters Road (72916) Phone: 479/649-4034
P.O. Box 1592 Cell: 479/322-0669
Fort Smith, AR 72902 Fax: 479/648-5588
Lisa.Overton@gerdau.com

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CERTIFIED MAIL™ RECEIPT
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Sent To: Ic of Enf + Comp Assurance
Street, Apt. No., or PO Box No.: EPA Washington DC
City, State, ZIP+4: 2/26/18

PS Form 3800, August 2006 See Reverse for Instructions

2017 Annual Hazardous Waste Export Report

Exporter: Gerdau – Fort Smith Mill
5225 Planters Rd.
P.O. Box 1592
Fort Smith, AR 72902

EPA # ARD053730701

Contact: Lisa Overton
Environmental Specialist
Phone Number: (479) 649-4034

Consignee: Zinc Nacional, SA
Serafin Pena 938 Sur
6400 Monterrey N.L. Mexico
Phone Number: 011-52-83400434

Waste Shipped: RQ, Hazardous Waste Solid N.O.S., Class 9, UN3077, PGIII, (K061) (Emission Control Dust/Sludge from Primary Production of Steel in Electric Furnaces) ERG #171

Quantity of Waste: 18,782,550 lbs. **Number of Shipments:** 101

Transporters: Fort Smith Railroad - US EPA ID Number – ARR000026096
Union Pacific - US EPA ID Number - NED001792910

Waste Minimization: K061 is a byproduct from the melting and refining of steel scrap in Electric Arc Furnaces. The major component, which contributes to the toxicity of the waste, is lead. The typical lead content of K061 is approximately 5% compared to 1% for the K061 produced at our facility. The low lead content is due to the use of "clean" scrap in our operations. The volume of K061 produced per ton of steel produced, was reduced by approximately 10% in the early 1980's by changing the method by which lime is added to the furnaces. No other feasible technology is known which would further reduce either the toxicity or volume of K061 produced.

I certify under the 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 fine and imprisonment.

Gerdau – Fort Smith Mill

Lisa Overton

February 23, 2018

Lisa Overton
Environmental Specialist

CY 2017 Hazardous Waste Exports

DATE Oct 17 - Sep 18	REPORT #	RAILCAR #	MANIFEST #	AES ITN #	BORDER XING DATE	WEIGHT LBS	WEIGHT TONS	WEIGHT Kg	13000 Tons Max RUNNING TOTAL	Remaining US Export Tons	Exported Metric Tons	11793 Tonnes Remaining Metric Export Tons
01/03/17	1	EAMX 7011	010391967 JJK			175400	87.70		87.70	12912.30	79.56	11713.44
01/05/17	2	EAMX 7008	010391968 JJK			188600	94.30		182.00	12818.00	85.55	11627.89
01/09/17	3	EAMX 7002	010391969 JJK			182200	91.10		273.10	12726.90	82.64	11545.25
01/10/17	4	EAMX 1339	010391972 JJK			189400	94.70		367.80	12632.20	85.91	11459.34
01/11/17	5	EAMX 7005	010391977 JJK			188500	94.25		462.05	12537.95	85.50	11373.84
01/17/17	6	EAMX 7001	010391976 JJK			186400	93.20		555.25	12444.75	84.55	11289.29
01/17/17	7	EAMX 1407	010391978 JJK			188400	94.20		649.45	12350.55	85.46	11203.83
01/23/17	8	EAMX 1340	010391975 JJK			187000	93.50		742.95	12257.05	84.82	11119.01
01/24/17	9	EAMX 7004	010391970 JJK			187100	93.55		836.50	12163.50	84.87	11034.14
01/30/17	10	EAMX 1338	010391971 JJK			187200	93.60		930.10	12069.90	84.91	10949.23
01/31/17	11	EAMX 7000	010391974 JJK			191000	95.50		1025.60	11974.40	86.64	10862.59
02/02/17	12	EAMX 7012	010391973 JJK			185900	92.95		1118.55	11881.45	84.32	10778.27
02/07/17	13	EAMX 7008	010391981 JJK			187800	93.90		1212.45	11787.55	85.18	10693.08
02/13/17	14	EAMX 1341	010391980 JJK			187800	93.90		1306.35	11693.65	85.18	10607.90
02/16/17	15	EAMX 1339	010391984 JJK			184400	92.20		1398.55	11601.45	83.64	10524.26
02/23/17	16	EAMX 7002	010391982 JJK			188100	94.05		1492.60	11507.40	85.32	10438.94
02/27/17	17	EAMX 7004	010391986 JJK			187700	93.85		1586.45	11413.55	85.14	10353.80
02/27/17	18	EAMX 7000	010391987 JJK			186300	93.15		1679.60	11320.40	84.50	10269.29
03/06/17	19	EAMX 1407	010391989 JJK			186100	93.05		1772.65	11227.35	84.41	10184.88
03/07/17	20	EAMX 7001	010391988 JJK			184700	92.35		1865.00	11135.00	83.78	10101.10
03/13/17	21	EAMX 1338	010391990JJK			187800	93.90		1958.90	11041.10	85.18	10015.92
03/13/17	22	EAMX 1340	010391991 JJK			183100	91.55		2050.45	10949.55	83.05	9932.86
03/20/17	23	EAMX 7005	010391992 JJK			187600	93.80		2144.25	10855.75	85.09	9847.77
03/21/17	24	EAMX 7011	010391993 JJK			190600	95.30		2239.55	10760.45	86.45	9761.31
03/27/17	25	EAMX 1339	010391995 JJK			182800	91.40		2330.95	10669.05	82.92	9678.40
03/27/17	26	EAMX 7008	010391996 JJK			184200	92.10		2423.05	10576.95	83.55	9594.85
04/03/17	27	EAMX 1341	010391994 JJK			187500	93.75		2516.80	10483.20	85.05	9509.80
04/03/17	28	EAMX 7004	010391997 JJK			187200	93.60		2610.40	10389.60	84.91	9424.88
04/10/17	29	EAMX 7012	010391998 JJK			187900	93.95		2704.35	10295.65	85.23	9339.65
04/10/17	30	EAMX 7002	010391999 JJK			187300	93.65		2798.00	10202.00	84.96	9254.70
04/17/17	31	EAMX 7001	016142501 JJK			186500	93.25		2891.25	10108.75	84.59	9170.10
04/18/17	32	EAMX 1407	010392000 JJK			187700	93.85		2985.10	10014.90	85.14	9084.96
04/19/17	33	EAMX 7000	016142502 JJK			187700	93.85		3078.95	9921.05	85.14	8999.82
04/24/17	34	EAMX 1338	016142503 JJK			176700	88.35		3167.30	9832.70	80.15	8919.67
04/25/17	35	EAMX 1339	016142506 JJK			187100	93.55		3260.85	9739.15	84.87	8834.81
04/27/17	36	EAMX 7005	016142505 JJK			186400	93.20		3354.05	9645.95	84.55	8750.26
04/27/17	37	EAMX 7011	016142507 JJK			186000	93.00		3447.05	9552.95	84.37	8665.89
05/10/17	38	EAMX 1340	016142508 JJK			186300	93.15		3540.20	9459.80	84.50	8581.38
05/15/17	39	EAMX 7003	016142509 JJK			182300	91.15		3631.35	9368.65	82.69	8498.69
06/05/17	40	EAMX 7012	016142510 JJK			188100	94.05		3725.40	9274.60	85.32	8413.37
06/05/17	41	EAMX 1341	016142511 JJK			186250	93.13		3818.53	9181.48	84.48	8328.89

CY 2017 Hazardous Waste Exports

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06/05/17	42	EAMX 7011	016142512 JJK			185800	92.90		3911.43	9088.58	84.28	8244.61
06/05/17	43	EAMX 1338	016142513 JJK			187650	93.83		4005.25	8994.75	85.12	8159.50
06/05/17	44	EAMX 7001	016142514 JJK			187900	93.95		4099.20	8900.80	85.23	8074.27
06/08/17	45	EAMX 7000	016142515 JJK			183150	91.58		4190.78	8809.23	83.08	7991.19
06/12/17	46	EAMX 1407	016142516 JJK			183850	91.93		4282.70	8717.30	83.39	7907.80
06/26/17	47	EAMX 7005	016142518 JJK			186400	93.20		4375.90	8624.10	84.55	7823.25
06/26/17	48	EAMX 1340	016142519 JJK			185100	92.55		4468.45	8531.55	83.96	7739.29
06/26/17	49	EAMX 7003	016142522 JJK			182150	91.08		4559.53	8440.48	82.62	7656.67
06/29/17	50	EAMX 1339	016142517 JJK			186200	93.10		4652.63	8347.38	84.46	7572.21
07/03/17	51	EAMX 7002	016142520 JJK			186100	93.05		4745.68	8254.33	84.41	7487.80
07/03/17	52	EAMX 1338	016142524 JJK			186950	93.48		4839.15	8160.85	84.80	7403.00
07/05/17	53	EAMX 7011	016142523 JJK			185450	92.73		4931.88	8068.13	84.12	7318.88
07/17/17	54	EAMX 7001	016142525 JJK			185950	92.98		5024.85	7975.15	84.35	7234.53
07/17/17	55	EAMX 7008	016142537 JJK			186450	93.23		5118.08	7881.93	84.57	7149.96
07/17/17	56	EAMX 1341	016142538 JJK			180450	90.23		5208.30	7791.70	81.85	7068.11
07/19/17	57	EAMX 7000	016142526 JJK			188350	94.18		5302.48	7697.53	85.43	6982.68
07/20/17	58	EAMX 1407	016142527 JJK			186400	93.20		5395.68	7604.33	84.55	6898.13
07/27/17	59	EAMX 1340	016142528 JJK			182950	91.48		5487.15	7512.85	82.98	6815.14
08/07/17	60	EAMX 7003	016142531 JJK			186000	93.00		5580.15	7419.85	84.37	6730.77
08/07/17	61	EAMX 7011	016142530 JJK			186000	93.00		5673.15	7326.85	84.37	6646.40
08/07/17	62	EAMX 7005	016142529 JJK			176200	88.10		5761.25	7238.75	79.92	6566.48
08/14/17	63	EAMX 1338	016142533 JJK			183100	91.55		5852.80	7147.20	83.05	6483.43
08/15/17	64	EAMX 1339	016142532 JJK			188550	94.28		5947.08	7052.93	85.52	6397.90
08/15/17	65	EAMX 7002	016142534 JJK			185700	92.85		6039.93	6960.08	84.23	6313.67
08/21/17	66	EAMX 7000	016142542 JJK			188650	94.33		6134.25	6865.75	85.57	6228.10
08/24/17	67	EAMX 1407	016142536 JJK			189500	94.75		6229.00	6771.00	85.96	6142.15
09/05/17	68	EAMX 1340	016142546 JJK			186250	93.13		6322.13	6677.88	84.48	6057.66
09/05/17	69	EAMX 7008	016142545 JJK			183700	91.85		6413.98	6586.03	83.32	5974.34
09/06/17	70	EAMX 7003	016142550 JJK			185400	92.70		6506.68	6493.33	84.10	5890.24
09/11/17	71	EAMX 7011	016142549 JJK			182700	91.35		6598.03	6401.98	82.87	5807.37
09/25/17	72	EAMX 7005	016142547 JJK			186950	93.48		6691.50	6308.50	84.80	5722.57
09/25/17	73	EAMX 7001	016142548 JJK			189200	94.60		6786.10	6213.90	85.82	5636.75
09/25/17	74	EAMX 7000	016142551 JJK			188050	94.03		6880.13	6119.88	85.30	5551.46
09/26/17	75	EAMX 1407	016142552 JJK			186050	93.03		6973.15	6026.85	84.39	5467.06
10/02/17	76	EAMX 7002	016142553 JJK			183250	91.63		7064.78	5935.23	83.12	5383.94
10/05/17	77	EAMX 1339	016142543 JJK			185850	92.93		7157.70	5842.30	84.30	5299.64
10/09/17	78	EAMX 1338	016142554 JJK			191450	95.73		7253.43	5746.58	86.84	5212.80
10/12/17	79	EAMX 7003	016142544 JJK			186600	93.30		7346.73	5653.28	84.64	5128.16
10/16/17	80	EAMX 7011	016142556 JJK			183900	91.95		7438.68	5561.33	83.42	5044.75
10/17/17	81	EAMX 1340	016142555 JJK			191450	95.73		7534.40	5465.60	86.84	4957.91
10/19/17	82	EAMX 1341	016142558 JJK			194300	97.15		7631.55	5368.45	88.13	4869.77

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10/24/17	83	EAMX 7012	0106142557 JJK			185950	92.98		7724.53	5275.47	84.35	4785.43
10/30/17	84	EAMX 7000	016142559 JJK			187650	93.83		7818.35	5181.65	85.12	4700.31
10/30/17	85	EAMX 7004	016142573 JJK			184350	92.18		7910.53	5089.47	83.62	4616.69
~~11/02/17~~	~~86~~	~~EAMX 1407~~	~~016142560 JJK~~				0.00		7910.53	5089.47	0.00	4616.69
11/06/17	86	EAMX 7005	016142561 JJK			171550	85.78		7996.30	5003.70	77.81	4538.88
11/06/17	87	EAMX 1407	016142562 JJK			198750	99.38		8095.68	4904.33	90.15	4448.73
11/07/17	88	EAMX 1339	016142572 JJK			184850	92.43		8188.10	4811.90	83.85	4364.88
11/09/17	89	EAMX 7001	016142563 JJK			189200	94.60		8282.70	4717.30	85.82	4279.06
11/13/17	90	EAMX 1338	016142564 JJK			186550	93.28		8375.98	4624.03	84.62	4194.44
11/13/17	91	EAMX 7002	016142565 JJK			179500	89.75		8465.73	4534.28	81.42	4113.02
11/15/17	92	EAMX 7011	016142566 JJK			188700	94.35		8560.08	4439.92	85.59	4027.43
11/27/17	93	EAMX 101238	016142568 JJK			187200	93.60		8653.68	4346.32	84.91	3942.52
11/28/17	94	EAMX 7012	016142569 JJK			187600	93.80		8747.48	4252.52	85.09	3857.42
12/04/17	95	EAMX 7008	016142567 JJK			178900	89.45		8836.93	4163.07	81.15	3776.28
12/05/17	96	EAMX 1339	016142571 JJK			181950	90.98		8927.90	4072.10	82.53	3693.75
12/11/17	97	EAMX 7005	016142570 JJK			185300	92.65		9020.55	3979.45	84.05	3609.69
12/11/17	98	EAMX 7000	016142576 JJK			190750	95.38		9115.93	3884.07	86.52	3523.17
12/14/17	99	EAMX 1407	016142574 JJK	X20180105158593	1/6/2018	182850	91.43	82,941	9207.35	3792.65	82.94	3440.23
12/18/17	100	EAMX 7001	016142577 JJK	X20171218334957	1/8/2018	181700	90.85	82,419	9298.20	3701.80	82.42	3357.81
12/18/17	101	EAMX 7002	016142578 JJK	X20171218336032	1/8/2018	186150	93.08	84,438	9391.28	3608.72	84.44	3273.38
						18,782,550						