



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

September 18, 2024

Douglas Aburano  
Attainment Planning and Maintenance Section  
Air Programs Branch  
U. S. Environmental Protection Agency Region V  
77 West Jackson Boulevard  
Chicago, IL 60604-3950

Re: Supplemental Information for the Redesignation of the Alton Nonattainment Area for the 2010 1-Hour SO<sub>2</sub> NAAQS

Dear Mr. Aburano,

Please find attached the requested supplemental information regarding the Alton Steel source in Alton, Illinois. The attached documents are the test results from the two most recently performed stack tests at the source (2017 and 2020) and the CAAPP Permit Annual Compliance Certifications for the years 2018 to 2023.

Attachment 1) 2017 Test Results Summary  
Attachment 2) 2020 Test Results Summary  
Attachment 3) 2018 Annual Compliance Certification  
Attachment 4) 2019 Annual Compliance Certification  
Attachment 5) 2020 Annual Compliance Certification  
Attachment 6) 2021 Annual Compliance Certification  
Attachment 7) 2022 Annual Compliance Certification  
Attachment 8) 2023 Annual Compliance Certification

If further information is required or should you have any questions, please feel free to contact Rory Davis, Air Quality Planning Section, Bureau of Air, at (217) 782-7397 or [rory.davis@illinois.gov](mailto:rory.davis@illinois.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Rory Davis".

Rory Davis  
Regulatory Development Unit  
Illinois EPA, Bureau of Air

## Attachments

2125 S. First Street, Champaign, IL 61820 (217) 278-5800  
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120  
9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000  
595 S. State Street, Elgin, IL 60123 (847) 608-3131

2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200  
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022  
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760

# ATTACHMENT 1) 2017 Test Result Summary



#5 Cut Street Alton, IL 62002 618 463-4490

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January 24, 2017

Illinois EPA, Bureau of Air  
Compliance & Enforcement Section (MC 40)  
1021 North Grand Avenue East  
PO Box 19276  
Springfield, IL 62794-9276

RECEIVED  
STATE OF ILLINOIS  
JAN 26 2017  
ENVIRONMENTAL  
BUREAU OF AIR QUALITY

**RE: CAAPP Permit No: 96020056 / ID No: 119010AAE  
Stack Testing Data Evaluation and Schedule for Subsequent Tests**

Dear Sir/Madam:

The purpose of this letter is to comply with Conditions 4.1.2(b)(ii)(F), 4.1.2(c)(ii)(B), 4.1.2(d)(ii)(B), 4.1.2(e)(ii)(A), 4.1.2(f)(ii)(A) and 4.2.2(c)(ii)(B) of our above referenced CAAPP Permit which require a stack testing data evaluation and establishment of the margin of compliance for certain emissions on our Electric Arc Furnace (EAF) and Ladle Metallurgy Furnace (LMF), and the development of a schedule of subsequent tests. This evaluation is required within 90 days of issuance of our permit, which was November 16, 2016, and a report to Illinois EPA within 60 days following the evaluation.

The Stack Testing Data Evaluation and schedule for subsequent tests is shown in Attachment 1. Based on the results of the evaluation, stack tests on our EAF for SO<sub>2</sub>, NO<sub>x</sub> and CO must be completed prior to January 24, 2020, and VOM and PM stack tests must be completed prior to January 24, 2022. Also, stack tests on our LMF for SO<sub>2</sub> must be completed prior to January 24, 2020.

If you require additional information, you may contact me at 618-374-3570.

Sincerely,

A handwritten signature in black ink that reads 'Matt Gill'.

Matt Gill, PE  
Director, Environmental Compliance

IEPA - DIVISION OF RECORDS MANAGEMENT  
RELEASABLE

FEB 15 2017

REVIEWER: RDH

cc: IEPA Collinsville Regional Office

Alton Steel, Inc.

Attachment 1.

IEPA I.D. No.: 119010AAE

Permit No.: 96020056

Evaluation Date: January 24, 2017

<b>Stack Testing Data Evaluation</b>						
<b>Emission Unit</b>	<b>Pollutant</b>	<b>Last Test Result</b>	<b>Permit Limit</b>	<b>Units</b>	<b>Margin of Compliance</b>	<b>Subsequent Stack Test Due</b>
Electric Arc Furnace	SO <sub>2</sub>	0.34	0.63	lb/T	46.0%	< 36 mo.
		24.2	70.6	lb/hr	65.7%	
		32.3	236.25	T/yr	86.3%	
	NO <sub>x</sub>	0.38	0.7	lb/T	45.7%	< 36 mo.
		26.8	78.4	lb/hr	65.8%	
		36.1	56.25	T/yr	35.8%	
	CO	1.39	2	lb/T	30.5%	< 36 mo.
		99.7	224	lb/hr	55.5%	
		132.1	750	T/yr	82.4%	
	VOM	0.04	0.15	lb/T	73.3%	< 60 mo.
		2.8	16.8	lb/hr	83.3%	
		3.8	262.5	T/yr	98.6%	
	PM <sub>10</sub>	0.0004	0.0052	Gr/scfd	92.3%	< 60 mo.
		1.32	21.4	lb/hr	93.8%	
		0.01	0.19	lb/T	94.7%	
		0.95	75.2	T/yr	98.7%	
PM	0.0009	0.0052	Gr/scfd	82.7%	< 60 mo.	
	3.39	21.4	lb/hr	84.2%		
	0.04	0.19	lb/T	78.9%		
	3.80	75.2	T/yr	94.9%		
LMF	SO <sub>2</sub>	>0.05	0.1	lb/T	<50.0%	< 36 mo.
		>2.86	11.2	lb/hr	<74.5%	
		>4.75	37.5	T/yr	<87.3%	

# ATTACHMENT 2) 2020 Test Result Summary



#5 Cut Street

Alton, IL 62002

618 463-4490

April 28, 2020

Illinois EPA, Bureau of Air  
Compliance & Enforcement Section (MC 40)  
1021 North Grand Avenue East  
PO Box 19276  
Springfield, IL 62794-9276

RECEIVED  
STATE OF ILLINOIS  
MAY 06 2020  
ENVIRONMENTAL PROTECTION AGENCY  
BUREAU OF AIR

**RE: CAAPP Permit No: 96020056 / ID No: 119010AAE  
Stack Testing Data Evaluation and Schedule for Subsequent Tests**

Dear Sir/Madam:

The purpose of this letter is to comply with Conditions 4.1.2(b)(ii)(F), 4.1.2(c)(ii)(B), 4.1.2(d)(ii)(B), 4.1.2(e)(ii)(A), 4.1.2(f)(ii)(A) and 4.2.2(c)(ii)(B) of our above referenced CAAPP Permit which require a stack testing data evaluation and establishment of the margin of compliance for certain emissions on our Electric Arc Furnace (EAF) and Ladle Metallurgy Furnace (LMF), and the development of a schedule of subsequent tests.

The Stack Testing Data Evaluation and schedule for subsequent tests in shown in Attachment 1.

If you require additional information, you may contact me at 618-374-3570.

Sincerely,

A handwritten signature in cursive script that reads 'Matt Gill'.

Matt Gill, PE  
Director, Environmental Compliance

cc: IEPA Collinsville Regional Office

IEPA-DIVISION OF RECORDS MANAGEMENT  
RELEASABLE

JUN 25 2020  
REVIEWER: EMI

Alton Steel, Inc.  
 IEPA I.D. No.: 119010AAE  
 Permit No.: 96020056  
 Evaluation Date: 3/16/2020

Attachment 1.

Stack Testing Data Evaluation								
Emission Unit	Pollutant	Stack Test Date or Evaluation	Last Test Result	Permit Limit	Units	Margin of Compliance	Subsequent Stack Test Due	Stack Test Due Date
Electric Arc Furnace	SO <sub>2</sub>	10/23/2019	0.11	0.63	lb/T	82.5%	< 60 mo.	10/21/2024
			9.8	70.6	lb/hr	86.1%		
			42.9	236.25	T/yr*	81.8%		
	NO <sub>x</sub>	10/23/2019	0.15	0.7	lb/T	78.6%	< 60 mo.	10/21/2024
			13.7	78.4	lb/hr	82.5%		
			60.0	262.5	T/yr*	77.1%		
	CO	10/23/2019	2.7	2	lb/T	-35.0%	< 36 mo.	10/22/2022
			242	224	lb/hr	-8.0%		
			1060.0	750	T/yr*	-41.3%		
	VOM	1/24/2017	0.04	0.15	lb/T	73.3%	< 60 mo.	1/24/2022
			2.8	16.8	lb/hr	83.3%		
			3.8	262.5	T/yr*	98.6%		
	PM <sub>10</sub>	1/24/2017	0.0004	0.0052	Gr/scfd	92.3%	< 60 mo.	1/24/2022
			1.32	21.4	lb/hr	93.8%		
			0.01	0.19	lb/T	94.7%		
	PM	1/24/2017	0.95	75.2	T/yr*	98.7%	< 60 mo.	1/24/2022
			0.0009	0.0052	Gr/scfd	82.7%		
			3.39	21.4	lb/hr	84.2%		
0.04			0.19	lb/T	78.9%			
LMF	SO <sub>2</sub>	10/24/2019	3.80	75.2	T/yr*	94.9%	< 36 mo.	10/23/2022
			0.06	0.1	lb/T	40.0%		
			5.4	11.2	lb/hr	51.8%		
			23.70	37.5	T/yr*	36.8%		

\* T/yr based on 8,760 operating hours per year at the tested emission and production rate.

**ATTACHMENT 3) 2018 ACC**

IEPA-DIVISION OF RECORDS MANAGEMENT  
RELEASABLE



MAY 14 2019

REVIEWER: SAB

#5 Cut Street Alton, IL 62002 618 463-4490

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April 26, 2019

Illinois EPA, Bureau of Air  
Compliance & Enforcement Section (MC 40)  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

Re: ID No. 119010AAE, Permit No. 96020056

In re: CAAPP Permit Annual Compliance Certification

Dear Sir/Madam:

Attached please find ASI's CAAPP Permit Annual Compliance Certification for 2018.

If you have any questions, feel free to call me at 618-374-3570.

Sincerely,

A handwritten signature in cursive script that reads 'Matt Gill'.

Matt Gill, PE  
Director, Environmental Compliance

cc: IEPA Collinsville Regional Office

RECEIVED  
STATE OF ILLINOIS

MAY 01 2019

ENVIRONMENTAL PROTECTION AGENCY  
BUREAU OF AIR



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
 DIVISION OF AIR POLLUTION CONTROL  
 COMPLIANCE AND SYSTEMS MANAGEMENT SECTION  
 1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276  
 SPRINGFIELD, ILLINOIS 62794-9276

EPA-DIVISION OF RECORDS MANAGEMENT  
 RELEASABLE

MAY 14 2019

REVIEWER: SAB

<b>CAAPP ANNUAL COMPLIANCE CERTIFICATION</b>	<i>FOR AGENCY USE ONLY</i>
	ID NUMBER:
	PERMIT #:
	DATE:

THE CLEAN AIR ACT PERMIT PROGRAM (CAAPP) REQUIRES THAT EACH CAAPP PERMIT HOLDER SUBMIT AN ANNUAL COMPLIANCE CERTIFICATION FOR ALL EMISSION UNITS AT THE SOURCE AS REQUIRED BY 40 CFR 70.6 (c) (5), 39.5 (7) (p) (v) OF THE ENVIRONMENTAL PROTECTION ACT AND CAAPP PERMIT CONDITION 9.8. THE COMPLIANCE CERTIFICATION REPORTING PERIOD IS JANUARY 1 TO DECEMBER 31 AND IS DUE ON OR BEFORE MAY 1 FOR THE PRECEDING CALENDAR YEAR. THIS CERTIFICATION FORM CAN BE USED BY FACILITIES TO SATISFY THIS REQUIREMENT.

<b>SOURCE INFORMATION</b>		
1) SOURCE NAME: ALTON STEEL, INC.		
2) SOURCE ADDRESS: #5 CUT STREET		
3) CITY: ALTON	4) COUNTY: MADISON	
5) TOWNSHIP:	6) STATE: IL	7) ZIP CODE: 62002
8) DATE FORM PREPARED: 04/26/19	9) SOURCE ID NO.: 119010AAE	
10) CAAPP PERMIT NO.: 96020056		
11) CALENDAR YEAR OR REPORTING PERIOD COVERED BY THIS REPORT: 2018		

<b>SOURCE COMPLIANCE INFORMATION</b>
12) CHECK EITHER (a) OR (b) BELOW:
(a) <input checked="" type="checkbox"/> During the entire reporting period, this source was in <b>continuous</b> compliance with ALL terms and conditions contained in its CAAPP permit. The method used to determine compliance for each term and condition is the method specified in the permit.
(b) _____ With the exception of the items identified in Table 1 and Table 2, this source was in <b>continuous</b> compliance with all terms and conditions contained in the permit. The method used to determine compliance for each term and condition is the method specified in the permit, unless otherwise indicated.
<b>NOTE: Table 1 must be completed for all units and activities regardless of compliance status. Table 2 must be completed for all sources of intermittent or continuous noncompliance with any permit condition.</b>

**ATTACHMENTS**

13) Are you submitting any attachments with this report? Yes  No

If yes, please list the attachments below:

**COMPLIANCE CERTIFICATION REPORT MAILING**

14) In addition to submitting the Compliance Certification report to the Compliance and Systems Management Section (CASM), a copy of the Compliance Certification report must also be submitted to the USEPA Region 5 and the appropriate IEPA regional field office. Addresses are listed in condition 8.6 of your CAAPP permit.

Please check the appropriate boxes.

A copy of the Compliance Certification report has been submitted to USEPA.

Yes  No

A copy of the Compliance Certification report has been submitted to the appropriate IEPA regional field office.

Yes  No

**SOURCE CONTACT PERSON**

15) NAME OF TECHNICAL CONTACT PERSON FOR THIS REPORT: MATT GILL

16) TECHNICAL CONTACT PERSON TITLE:  
Director, Environmental Compliance

17) CONTACT PERSON'S TELEPHONE NUMBER:  
(618) 374-3570

**COMPLIANCE STATEMENT AND SIGNATURE BLOCK**

NOTE: A RESPONSIBLE OFFICIAL MUST SIGN THIS COMPLIANCE CERTIFICATION. UNSIGNED COMPLIANCE CERTIFICATIONS WILL BE RETURNED AS INCOMPLETE.

18) I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

AUTHORIZED SIGNATURE:

BY:

  
\_\_\_\_\_  
AUTHORIZED SIGNATURE

James Hrusovsky

TYPED OR PRINTED NAME OF SIGNATORY

President & CEO

TITLE OF SIGNATORY

4 / 29 / 2019

DATE



**Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions**

Source Name		Source I.D. Number	
ALTON STEEL, INC.		119010AAE	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
3.1(a)(i)	No fugitive emissions beyond property line per 35 IAC 212.301 and 212.314.	C	Recordkeeping
3.1(b)	Ozone depleting substance requirements per 40 CFR Part 82.	C	Recordkeeping
3.1(c)	Asbestos Demolition and Renovation.	C	Recordkeeping
3.1(d)	Future Emission Standards.	C	Recordkeeping
3.2(a)	Fugitive PM Operating Program requirements per 35 IAC 212.	C	Plan maintained at the source; recordkeeping of activities
3.2(b)	PM <sub>10</sub> Contingency Measure Plan.	C	Recordkeeping, should the source become subject to the rule.
3.2(c)	Episode Action Plan, 35 IAC 244.	C	Plan maintained at the source and filed with IEPA.
3.2(d)	Risk Management Plan, 40 CFR Part 68.	C	Recordkeeping, should the source become subject to the rule.
3.2(e)	Scrap Pollution Prevention Plan.	C	Plan maintained at the source and filed with IEPA and recordkeeping.
3.2(f)	Site-Specific Plan for Mercury Switches.	C	Plan maintained at the source and filed with IEPA and recordkeeping.
3.5(a)	Prompt Reporting.	C	Recordkeeping
3.5(b)	Semiannual Reporting.	C	Recordkeeping
3.5(c)	Annual Emissions Report.	C	Recordkeeping
3.5(d)	Federal Reporting for Scrap Control.	C	Recordkeeping
4.1.2(a)(i)(A)	Opacity <6% per 40 CFR 63.10686(b)(2).	C	Method 9 observations 3 times per 7 operating days per Condition 4.1.2(a)(ii)(A)(I), recordkeeping per Condition 4.1.2(a)(ii)(C)-(D).
4.1.2(a)(i)(B)	Opacity from Control Devices ≤3% [T1] Limit.	C	Method 9 observations 3 times per 7 operating days per Condition 4.1.2(a)(ii)(B)(I), recordkeeping per Condition 4.1.2(a)(ii)(C)-(D).

**Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions**

Source Name		Source I.D. Number	Compliance Determination Method	
ALTON STEEL, INC.		119010AAE	(4)	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"		
4.1.2(b)(i)(A)-(D)	PM Requirements per 40 CFR 63.10686(b)(1), [T1] Limit and 35 IAC 212.448.	C	Monitoring per Condition 4.1.2(b)(ii)(A)-(D), Testing per Condition 4.1.2(b)(ii)(E)-(F) and Recordkeeping per Condition 4.1.2(b)(ii)(G)-(H).	
4.1.2(c)(i)(A)	SO <sub>2</sub> Limits per 35 IAC 214.301 and [T1] Limits.	C	Monitoring per Condition 4.1.2(c)(ii)(A), Testing per Condition 4.1.2(c)(ii)(B)-(C) and Recordkeeping per Condition 4.1.2(c)(ii)(D).	
4.1.2(d)(i)(A)	VOM Requirements [T1] Limit.	C	Monitoring per Condition 4.1.2(d)(ii)(A), Testing per Condition 4.1.2(d)(ii)(B)-(C) and Recordkeeping per Condition 4.1.2(d)(ii)(D).	
4.1.2(e)(i)(A)	CO Requirements [T1] Limit.	C	Monitoring per Condition 4.1.2(e)(ii)(A <sub>1</sub> ), Testing per Condition 4.1.2(e)(ii)(A <sub>2</sub> )-(B) and Recordkeeping per Condition 4.1.2(e)(ii)(A <sub>3</sub> ).	
4.1.2(f)(i)(A)	NO <sub>x</sub> Requirements [T1] Limit.	C	Monitoring per Condition 4.1.2(f)(ii)(A <sub>1</sub> ), Testing per Condition 4.1.2(f)(ii)(A <sub>2</sub> )-(B) and Recordkeeping per Condition 4.1.2(f)(ii)(A <sub>3</sub> ).	
4.1.2(g)(i)(A)	Lead Requirements [T1] Limit.	C	Monitoring per Condition 4.1.2(g)(ii)(A) and Recordkeeping per Condition 4.1.2(g)(ii)(B).	
4.1.2(h)(i)(A)	Annual Steel Production ≤ 112 T/hour and 750,000 T/year.	C	Monitoring per Condition 4.1.2(h)(ii)(A)-(B) and Recordkeeping per Condition 4.1.2(h)(ii)(C).	
4.1.2(i)(i)(A)	Work Practices related to emissions control system, Scrap Pollution Prevention Plan and EMS building inspections.	C	Monthly operational inspections and Recordkeeping.	
4.1.4(a)-4.1.5	Malfunction/Breakdown provisions for EMS.	C	Detailed recordkeeping of periods of operation during malfunction/breakdown with excess emissions.	
4.2.2(a)(i)	LMF Opacity ≤ 30% per 35 IAC 212.123(a).	C	Monthly Method 9 opacity observations, monthly inspections of LMF Baghouse and Recordkeeping.	
4.2.2(b)(i)	PM Requirements per 35 IAC 212.321(a) and [T1] Limits.	C	Recordkeeping.	
4.2.2(c)(i)	SO <sub>2</sub> Limits per 35 IAC 214.301 and [T1] Limits.	C	Monitoring per Condition 4.2.2(c)(ii)(A), Testing per Condition 4.2.2(c)(ii)(B)-(C) and Recordkeeping per Condition 4.2.2(c)(ii)(D).	
4.2.2(d)(i)	VOM Requirements [T1] Limit.	C	Monitoring per Condition 4.2.2(d)(ii)(A) and Recordkeeping per Condition 4.2.2(d)(ii)(B).	
4.2.2(e)(i)	NO <sub>x</sub> Requirements [T1] Limit.	C	Monitoring per Condition 4.2.2(e)(ii)(A) and Recordkeeping per Condition 4.2.2(e)(ii)(B).	
4.2.2(f)(i)	CO Requirements [T1] Limit.	C	Recordkeeping.	
4.2.2(g)(i)	Lead Requirements [T1] Limit.	C	Recordkeeping.	

**Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions**

Source Name		Source I.D. Number	
ALTON STEEL, INC.		119010AAE	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
4.2.2(h)(i)	Work Practices related to LMF Baghouse.	C	Recordkeeping.
4.2.4(a)-4.2.5	Malfunction/Breakdown provisions for LMF.	C	Detailed recordkeeping of periods of operation during malfunction/breakdown with excess emissions.
4.3.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a).	C	Recordkeeping.
4.3.2(b)(i)	PM Requirements per 35 IAC 212.322(a) and [T1] Limits.	C	Recordkeeping.
4.3.2(c)(i)	SO <sub>2</sub> Limits per 35 IAC 214.301 and [T1] Limits.	C	Recordkeeping.
4.3.2(d)(i)	VOM Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(e)(i)	NOx Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(f)(i)	CO Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(g)(i)	Lead Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(h)(i)	Work Practices related to EAF Baghouse.	C	Recordkeeping.
4.4.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a).	C	Annual Method 9 Opacity observations and Recordkeeping.
4.4.2(b)(i)	PM Requirements per 35 IAC 212.322(a) and [T1] Limits.	C	Recordkeeping.
4.4.2(c)(i)	CO Requirements [T1] Limit.	C	Recordkeeping.
4.4.2(d)(i)	NOx Requirements [T1] Limit.	C	Testing within 36 months, Recordkeeping.
4.4.2(e)(i)	VOM Requirements [T1] Limit.	C	Recordkeeping.
4.4.2(f)(i)	SO <sub>2</sub> Requirements [T1] Limits.	C	Recordkeeping.

**Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions**

Source Name		Source I.D. Number	
ALTON STEEL, INC.		119010AAE	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
4.4.2(g)(i)	Lead Requirements [T1] Limit.	C	Recordkeeping.
4.4.2(h)(i)	Annual Natural Gas Usage $\leq$ 1,130 mmscf.	C	Recordkeeping.
4.5.2(a)(i)	Opacity $\leq$ 30% per 35 IAC 212.123(a).	C	Monthly Method 9 Opacity observations, inspections and Recordkeeping.
4.5.2(b)(i)	PM Requirements per 35 IAC 212.322(a).	C	Monthly Inspections and Recordkeeping.
4.6.2(a)(i)	Opacity $\leq$ 30% per 35 IAC 212.123(a) and no fugitive particulate matter at the property line.	C	Monthly Method 9 Opacity observations, Weekly Method 22 observations at the property line and Recordkeeping.
4.6.2(b)(i)	Work Practices and Control Requirements to reduce Fugitive PM.	C	Work Practices from 35 IAC 212 Subpart K and Recordkeeping.
7.5(a)	CAM Plan for EAF #7.	C	Monitoring and Recordkeeping as specified in CAM Plan Table 7.5.1.

# ATTACHMENT 4) 2019 ACC



#5 Cut Street

Alton, IL 62002

618 463-4490

April 21, 2020

Illinois EPA, Bureau of Air  
Compliance & Enforcement Section (MC 40)  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

Re: ID No. 119010AAE, Permit No. 96020056

In re: CAAPP Permit Annual Compliance Certification

RECEIVED  
STATE OF ILLINOIS  
MAY 06 2020  
ENVIRONMENTAL PROTECTION AGENCY  
BUREAU OF AIR

Dear Sir/Madam:

Attached please find ASI's CAAPP Permit Annual Compliance Certification for 2019. ASI was in intermittent compliance with Condition 4.1.2(e)(i)(A), CO limits for pounds per ton and pounds per hour emissions based on the results of a stack test on October 23-24, 2019. ASI is currently investigating the causes of the high CO readings and will conduct another stack test as soon as practical and will notify the Agency prior to stack testing as required by condition 7.1 of the above referenced CAAPP Permit.

If you have any questions, feel free to call me at 618-374-3570.

Sincerely,

Matt Gill, PE  
Director, Environmental Compliance

cc: IEPA Collinsville Regional Office

IEPA - DIVISION OF RECORDS MANAGEMENT  
RELEASABLE

JUN 23 2020

REVIEWER: JMR



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
 DIVISION OF AIR POLLUTION CONTROL  
 COMPLIANCE AND SYSTEMS MANAGEMENT SECTION  
 1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276  
 SPRINGFIELD, ILLINOIS 62794-9276

<b>CAAPP ANNUAL COMPLIANCE CERTIFICATION</b>	<b>FOR AGENCY USE ONLY</b>
	ID NUMBER:
	PERMIT #:
	DATE:

THE CLEAN AIR ACT PERMIT PROGRAM (CAAPP) REQUIRES THAT EACH CAAPP PERMIT HOLDER SUBMIT AN ANNUAL COMPLIANCE CERTIFICATION FOR ALL EMISSION UNITS AT THE SOURCE AS REQUIRED BY 40 CFR 70.6 (c) (5), 39.5 (7) (p) (v) OF THE ENVIRONMENTAL PROTECTION ACT AND CAAPP PERMIT CONDITION 9.8. THE COMPLIANCE CERTIFICATION REPORTING PERIOD IS JANUARY 1 TO DECEMBER 31 AND IS DUE ON OR BEFORE MAY 1 FOR THE PRECEDING CALENDAR YEAR. THIS CERTIFICATION FORM CAN BE USED BY FACILITIES TO SATISFY THIS REQUIREMENT.

<b>SOURCE INFORMATION</b>		
1) SOURCE NAME: ALTON STEEL, INC.		
2) SOURCE ADDRESS: #5 CUT STREET		
3) CITY: ALTON	4) COUNTY: MADISON	
5) TOWNSHIP:	6) STATE: IL	7) ZIP CODE: 62002
8) DATE FORM PREPARED: 04/20/20		9) SOURCE ID NO.: 119010AAE
10) CAAPP PERMIT NO.: 96020056		
11) CALENDAR YEAR OR REPORTING PERIOD COVERED BY THIS REPORT: 2019		

<b>SOURCE COMPLIANCE INFORMATION</b>
12) CHECK EITHER (a) OR (b) BELOW:
(a) _____ During the entire reporting period, this source was in <b>continuous</b> compliance with ALL terms and conditions contained in its CAAPP permit. The method used to determine compliance for each term and condition is the method specified in the permit.
(b) <input checked="" type="checkbox"/> With the exception of the items identified in Table 1 and Table 2, this source was in <b>continuous</b> compliance with all terms and conditions contained in the permit. The method used to determine compliance for each term and condition is the method specified in the permit, unless otherwise indicated.
<b>NOTE: Table 1 must be completed for all units and activities regardless of compliance status. Table 2 must be completed for all sources of intermittent or continuous noncompliance with any permit condition.</b>

**ATTACHMENTS**

13) Are you submitting any attachments with this report? Yes  No

If yes, please list the attachments below:

**COMPLIANCE CERTIFICATION REPORT MAILING**

14) In addition to submitting the Compliance Certification report to the Compliance and Systems Management Section (CASM), a copy of the Compliance Certification report must also be submitted to the USEPA Region 5 and the appropriate IEPA regional field office. Addresses are listed in condition 8.6 of your CAAPP permit.

Please check the appropriate boxes.

A copy of the Compliance Certification report has been submitted to USEPA.

Yes  No

A copy of the Compliance Certification report has been submitted to the appropriate IEPA regional field office.

Yes  No

**SOURCE CONTACT PERSON**

15) NAME OF TECHNICAL CONTACT PERSON FOR THIS REPORT: MATT GILL

16) TECHNICAL CONTACT PERSON TITLE:  
Director, Environmental Compliance

17) CONTACT PERSON'S TELEPHONE NUMBER:  
(618) 374-3570

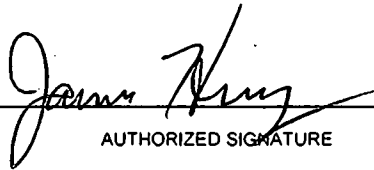
**COMPLIANCE STATEMENT AND SIGNATURE BLOCK**

NOTE: A RESPONSIBLE OFFICIAL MUST SIGN THIS COMPLIANCE CERTIFICATION. UNSIGNED COMPLIANCE CERTIFICATIONS WILL BE RETURNED AS INCOMPLETE.

18) I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

AUTHORIZED SIGNATURE:

BY:

  
\_\_\_\_\_  
AUTHORIZED SIGNATURE  
James Hrusovsky

\_\_\_\_\_  
President & CEO

TITLE OF SIGNATORY

4, 28, 2020

TYPED OR PRINTED NAME OF SIGNATORY

DATE

Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions

Source Name		Source I.D. Number		
ALTON STEEL, INC.		119010AAE		
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method	
3.1(a)(i)	No fugitive emissions beyond property line per 35 IAC 212.301 and 212.314.	C	Recordkeeping	
3.1(b)	Ozone depleting substance requirements per 40 CFR Part 82.	C	Recordkeeping	
3.1(c)	Asbestos Demolition and Renovation.	C	Recordkeeping	
3.1(d)	Future Emission Standards.	C	Recordkeeping	
3.2(a)	Fugitive PM Operating Program requirements per 35 IAC 212.	C	Plan maintained at the source; recordkeeping of activities	
3.2(b)	PM <sub>10</sub> Contingency Measure Plan.	C	Recordkeeping, should the source become subject to the rule.	
3.2(c)	Episode Action Plan, 35 IAC 244.	C	Plan maintained at the source and filed with IEPA.	
3.2(d)	Risk Management Plan, 40 CFR Part 68.	C	Recordkeeping, should the source become subject to the rule.	
3.2(e)	Scrap Pollution Prevention Plan.	C	Plan maintained at the source and filed with IEPA and recordkeeping.	
3.2(f)	Site-Specific Plan for Mercury Switches.	C	Plan maintained at the source and filed with IEPA and recordkeeping.	
3.5(a)	Prompt Reporting.	C	Recordkeeping	
3.5(b)	Semiannual Reporting.	C	Recordkeeping	
3.5(c)	Annual Emissions Report.	C	Recordkeeping	
3.5(d)	Federal Reporting for Scrap Control.	C	Recordkeeping	
4.1.2(a)(i)(A)	Opacity <6% per 40 CFR 63.10686(b)(2).	C	Method 9 observations 3 times per 7 operating days per Condition 4.1.2(a)(ii)(A)(i), recordkeeping per Condition 4.1.2(a)(ii)(C)-(D).	
4.1.2(a)(i)(B)	Opacity from Control Devices ≤3% [T1] Limit.	C	Method 9 observations 3 times per 7 operating days per Condition 4.1.2(a)(ii)(B)(i), recordkeeping per Condition 4.1.2(a)(ii)(C)-(D).	



Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions

Source Name		Source I.D. Number		
ALTON STEEL, INC.		119010AAE		
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method	
4.1.2(b)(i)(A)-(D)	PM Requirements per 40 CFR 63.10686(b)(1), [T1] Limit and 35 IAC 212.448.	C	Monitoring per Condition 4.1.2(b)(iii)(A)-(D), Testing per Condition 4.1.2(b)(ii)(E)-(F) and Recordkeeping per Condition 4.1.2(b)(iii)(G)-(H).	
4.1.2(c)(i)(A)	SO <sub>2</sub> Limits per 35 IAC 214.301 and [T1] Limits.	C	Monitoring per Condition 4.1.2(c)(iii)(A), Testing per Condition 4.1.2(c)(ii)(B)-(C) and Recordkeeping per Condition 4.1.2(c)(ii)(D).	
4.1.2(d)(i)(A)	VOM Requirements [T1] Limit.	C	Monitoring per Condition 4.1.2(d)(ii)(A), Testing per Condition 4.1.2(d)(ii)(B)-(C) and Recordkeeping per Condition 4.1.2(d)(ii)(D).	
4.1.2(e)(i)(A)	CO Requirements [T1] Limit.	I	Monitoring per Condition 4.1.2(e)(ii)(A <sub>1</sub> ), Testing per Condition 4.1.2(e)(ii)(A <sub>2</sub> )-(B) and Recordkeeping per Condition 4.1.2(e)(ii)(A <sub>3</sub> ).	
4.1.2(f)(i)(A)	NO <sub>x</sub> Requirements [T1] Limit.	C	Monitoring per Condition 4.1.2(f)(iii)(A <sub>1</sub> ), Testing per Condition 4.1.2(f)(ii)(A <sub>2</sub> )-(B) and Recordkeeping per Condition 4.1.2(f)(ii)(A <sub>3</sub> ).	
4.1.2(g)(i)(A)	Lead Requirements [T1] Limit.	C	Monitoring per Condition 4.1.2(g)(ii)(A) and Recordkeeping per Condition 4.1.2(g)(ii)(B).	
4.1.2(h)(i)(A)	Annual Steel Production ≤ 112 T/hour and 750,000 T/year.	C	Monitoring per Condition 4.1.2(h)(ii)(A)-(B) and Recordkeeping per Condition 4.1.2(h)(ii)(C).	
4.1.2(i)(i)(A)	Work Practices related to emissions control system, Scrap Pollution Prevention Plan and EMS building inspections.	C	Monthly operational inspections and Recordkeeping.	
4.1.4(a)-4.1.5	Malfunction/Breakdown provisions for EMS.	C	Detailed recordkeeping of periods of operation during malfunction/breakdown with excess emissions.	
4.2.2(a)(i)	LMF Opacity ≤ 30% per 35 IAC 212.123(a).	C	Monthly Method 9 opacity observations, monthly inspections of LMF Baghouse and Recordkeeping.	
4.2.2(b)(i)	PM Requirements per 35 IAC 212.321(a) and [T1] Limits.	C	Recordkeeping.	
4.2.2(c)(i)	SO <sub>2</sub> Limits per 35 IAC 214.301 and [T1] Limits.	C	Monitoring per Condition 4.2.2(c)(iii)(A), Testing per Condition 4.2.2(c)(ii)(B)-(C) and Recordkeeping per Condition 4.2.2(c)(ii)(D).	
4.2.2(d)(i)	VOM Requirements [T1] Limit.	C	Monitoring per Condition 4.2.2(d)(iii)(A) and Recordkeeping per Condition 4.2.2(d)(ii)(B).	
4.2.2(e)(i)	NO <sub>x</sub> Requirements [T1] Limit.	C	Monitoring per Condition 4.2.2(e)(iii)(A) and Recordkeeping per Condition 4.2.2(e)(ii)(B).	
4.2.2(f)(i)	CO Requirements [T1] Limit.	C	Recordkeeping.	
4.2.2(g)(i)	Lead Requirements [T1] Limit.	C	Recordkeeping.	

Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions

Source Name		Source I.D. Number	
ALTON STEEL, INC.		119010AAE	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
4.2.2(h)(i)	Work Practices related to LMF Baghouse.	C	Recordkeeping.
4.2.4(a)-4.2.5	Malfunction/Breakdown provisions for LMF.	C	Detailed recordkeeping of periods of operation during malfunction/breakdown with excess emissions.
4.3.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a).	C	Recordkeeping.
4.3.2(b)(i)	PM Requirements per 35 IAC 212.322(a) and [T1] Limits.	C	Recordkeeping.
4.3.2(c)(i)	SO <sub>2</sub> Limits per 35 IAC 214.301 and [T1] Limits.	C	Recordkeeping.
4.3.2(d)(i)	VOM Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(e)(i)	NO <sub>x</sub> Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(f)(i)	CO Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(g)(i)	Lead Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(h)(i)	Work Practices related to EAF Baghouse.	C	Recordkeeping.
4.4.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a).	C	Annual Method 9 Opacity observations and Recordkeeping.
4.4.2(b)(i)	PM Requirements per 35 IAC 212.322(a) and [T1] Limits.	C	Recordkeeping.
4.4.2(c)(i)	CO Requirements [T1] Limit.	C	Recordkeeping.
4.4.2(d)(i)	NO <sub>x</sub> Requirements [T1] Limit.	C	Testing within 36 months, Recordkeeping.
4.4.2(e)(i)	VOM Requirements [T1] Limit.	C	Recordkeeping.
4.4.2(f)(i)	SO <sub>2</sub> Requirements [T1] Limits.	C	Recordkeeping.

Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions

Source Name		Source I.D. Number	
ALTON STEEL, INC.		119010AAE	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
4.4.2(g)(i)	Lead Requirements [T1] Limit.	C	Recordkeeping.
4.4.2(h)(i)	Annual Natural Gas Usage $\leq$ 1,130 mmscf.	C	Recordkeeping.
4.5.2(a)(i)	Opacity $\leq$ 30% per 35 IAC 212.123(a).	C	Monthly Method 9 Opacity observations, inspections and Recordkeeping.
4.5.2(b)(i)	PM Requirements per 35 IAC 212.322(a).	C	Monthly Inspections and Recordkeeping.
4.6.2(a)(i)	Opacity $\leq$ 30% per 35 IAC 212.123(a) and no fugitive particulate matter at the property line.	C	Monthly Method 9 Opacity observations, Weekly Method 22 observations at the property line and Recordkeeping.
4.6.2(b)(i)	Work Practices and Control Requirements to reduce Fugitive PM.	C	Work Practices from 35 IAC 212 Subpart K and Recordkeeping.
7.5(a)	CAM Plan for EAF #7.	C	Monitoring and Recordkeeping as specified in CAM Plan Table 7.5.1.

**Table 2. Deviation Summary Report**

Source Name		Source I. D. Number				
ALTON STEEL INC.		119010AAE				
(1) Permit Condition Reference	(2) Description of Permit Condition	(3) Deviation Period Start Date	(4) Deviation Period -End Date	(5) Description and Cause of Deviation	(6) Corrective Action(s) Taken to Remedy Deviation	(7) Measure(s) Taken to Prevent Future Deviations
4.1.2(e)(i)(A)	CO emission limits	12/9/2019		lbs/T & lbs/hr exceeded limit during stack test.	Ongoing testing to determine cause of high CO readings	



#5 Cut Street

Alton, IL 62002

618 463-4490

**ATTACHMENT 5) 2020 ACC**

April 16, 2021

Illinois EPA, Bureau of Air  
Compliance & Enforcement Section (MC 40)  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

RECEIVED  
STATE OF ILLINOIS  
APR 23 2021  
ENVIRONMENTAL PROTECTION AGENCY  
BUREAU OF AIR

Re: ID No. 119010AAE, Permit No. 96020056

In re: CAAPP Permit Annual Compliance Certification

Dear Sir/Madam:

Attached please find ASI's CAAPP Permit Annual Compliance Certification for calendar year 2020. ASI was in intermittent compliance with Condition 4.1.2(e)(i)(A), CO limits for pounds per ton and pounds per hour emissions based on the results of a stack test on October 23-24, 2019. ASI is currently working with the IEPA Compliance Section, the IEPA Division of Legal Counsel, and IEPA Bureau of Air Permitting Sections to modify our Title V and/or Title I Permits to allow compliance with the limits discussed above.

If you have any questions, feel free to call me at 618-374-3570.

Sincerely,

Matt Gill, PE  
Director, Environmental Compliance

cc: IEPA Collinsville Regional Office

IEPA-DIVISION OF RECORDS MANAGEMENT  
RELEASABLE

MAY 14 2021

REVIEWER: SAB



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
 DIVISION OF AIR POLLUTION CONTROL  
 COMPLIANCE AND SYSTEMS MANAGEMENT SECTION  
 1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276  
 SPRINGFIELD, ILLINOIS 62794-9276

<b>CAAPP ANNUAL COMPLIANCE CERTIFICATION</b>	<b>FOR AGENCY USE ONLY</b>
	ID NUMBER:
	PERMIT #:
	DATE:

THE CLEAN AIR ACT PERMIT PROGRAM (CAAPP) REQUIRES THAT EACH CAAPP PERMIT HOLDER SUBMIT AN ANNUAL COMPLIANCE CERTIFICATION FOR ALL EMISSION UNITS AT THE SOURCE AS REQUIRED BY 40 CFR 70.6 (c) (5), 39.5 (7) (p) (v) OF THE ENVIRONMENTAL PROTECTION ACT AND CAAPP PERMIT CONDITION 9.8. THE COMPLIANCE CERTIFICATION REPORTING PERIOD IS JANUARY 1 TO DECEMBER 31 AND IS DUE ON OR BEFORE MAY 1 FOR THE PRECEDING CALENDAR YEAR. THIS CERTIFICATION FORM CAN BE USED BY FACILITIES TO SATISFY THIS REQUIREMENT.

<b>SOURCE INFORMATION</b>		
1) SOURCE NAME: ALTON STEEL, INC.		
2) SOURCE ADDRESS: #5 CUT STREET		
3) CITY: ALTON	4) COUNTY: MADISON	
5) TOWNSHIP:	6) STATE: IL	7) ZIP CODE: 62002
8) DATE FORM PREPARED: 04/16/21		9) SOURCE ID NO.: 119010AAE
10) CAAPP PERMIT NO.: 96020056		
11) CALENDAR YEAR OR REPORTING PERIOD COVERED BY THIS REPORT: 2020		

<b>SOURCE COMPLIANCE INFORMATION</b>
12) CHECK EITHER (a) OR (b) BELOW:
(a) _____ During the entire reporting period, this source was in <b>continuous</b> compliance with ALL terms and conditions contained in its CAAPP permit. The method used to determine compliance for each term and condition is the method specified in the permit.
(b) <input checked="" type="checkbox"/> With the exception of the items identified in Table 1 and Table 2, this source was in <b>continuous</b> compliance with all terms and conditions contained in the permit. The method used to determine compliance for each term and condition is the method specified in the permit, unless otherwise indicated.
<b>NOTE: Table 1 must be completed for all units and activities regardless of compliance status. Table 2 must be completed for all sources of intermittent or continuous noncompliance with any permit condition.</b>

**ATTACHMENTS**

13) Are you submitting any attachments with this report? Yes  No

If yes, please list the attachments below:

Table 1, Pages 1-4.

**COMPLIANCE CERTIFICATION REPORT MAILING**

14) In addition to submitting the Compliance Certification report to the Compliance and Systems Management Section (CASM), a copy of the Compliance Certification report must also be submitted to the USEPA Region 5 and the appropriate IEPA regional field office. Addresses are listed in condition 8.6 of your CAAPP permit.

Please check the appropriate boxes.

A copy of the Compliance Certification report has been submitted to USEPA.

Yes  No

A copy of the Compliance Certification report has been submitted to the appropriate IEPA regional field office.

Yes  No

**SOURCE CONTACT PERSON**

15) NAME OF TECHNICAL CONTACT PERSON FOR THIS REPORT: MATT GILL

16) TECHNICAL CONTACT PERSON TITLE:  
Director, Environmental Compliance

17) CONTACT PERSON'S TELEPHONE NUMBER:  
(618) 374-3570

**COMPLIANCE STATEMENT AND SIGNATURE BLOCK**

NOTE: A RESPONSIBLE OFFICIAL MUST SIGN THIS COMPLIANCE CERTIFICATION. UNSIGNED COMPLIANCE CERTIFICATIONS WILL BE RETURNED AS INCOMPLETE.

18) I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

AUTHORIZED SIGNATURE:

BY: James Hrusovsky  
AUTHORIZED SIGNATURE  
James Hrusovsky

President & CEO  
TITLE OF SIGNATORY  
4, 21, 2021

TYPED OR PRINTED NAME OF SIGNATORY

DATE

Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions

Source Name		Source I.D. Number		
ALTON STEEL, INC.		119010AAE		
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method	
3.1(a)(i)	No fugitive emissions beyond property line per 35 IAC 212.301 and 212.314.	C	Recordkeeping	
3.1(b)	Ozone depleting substance requirements per 40 CFR Part 82.	C	Recordkeeping	
3.1(c)	Asbestos Demolition and Renovation.	C	Recordkeeping	
3.1(d)	Future Emission Standards.	C	Recordkeeping	
3.2(a)	Fugitive PM Operating Program requirements per 35 IAC 212.	C	Plan maintained at the source; recordkeeping of activities	
3.2(b)	PM <sub>10</sub> Contingency Measure Plan.	C	Recordkeeping, should the source become subject to the rule.	
3.2(c)	Episode Action Plan, 35 IAC 244.	C	Plan maintained at the source and filed with IEPA.	
3.2(d)	Risk Management Plan, 40 CFR Part 68.	C	Recordkeeping, should the source become subject to the rule.	
3.2(e)	Scrap Pollution Prevention Plan.	C	Plan maintained at the source and filed with IEPA and recordkeeping.	
3.2(f)	Site-Specific Plan for Mercury Switches.	C	Plan maintained at the source and filed with IEPA and recordkeeping.	
3.5(a)	Prompt Reporting.	C	Recordkeeping	
3.5(b)	Semiannual Reporting.	C	Recordkeeping	
3.5(c)	Annual Emissions Report.	C	Recordkeeping	
3.5(d)	Federal Reporting for Scrap Control.	C	Recordkeeping	
4.1.2(a)(i)(A)	Opacity <6% per 40 CFR 63.10686(b)(2).	C	Method 9 observations 3 times per 7 operating days per Condition 4.1.2(a)(ii)(A)(i), recordkeeping per Condition 4.1.2(a)(ii)(C)-(D).	
4.1.2(a)(i)(B)	Opacity from Control Devices s3% [T1] Limit.	C	Method 9 observations 3 times per 7 operating days per Condition 4.1.2(a)(ii)(B)(i), recordkeeping per Condition 4.1.2(a)(ii)(C)-(D).	



Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions

Source Name		Source I.D. Number	
ALTON STEEL, INC.		119010AAE	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
4.1.2(b)(i)(A)-(D)	PM Requirements per 40 CFR 63.10686(b)(1), [T1] Limit and 35 IAC 212.448.	C	Monitoring per Condition 4.1.2(b)(i)(A)-(D), Testing per Condition 4.1.2(b)(i)(E)-(F) and Recordkeeping per Condition 4.1.2(b)(i)(G)-(H).
4.1.2(c)(i)(A)	SO <sub>2</sub> Limits per 35 IAC 214.301 and [T1] Limits.	C	Monitoring per Condition 4.1.2(c)(i)(A), Testing per Condition 4.1.2(c)(i)(B)-(C) and Recordkeeping per Condition 4.1.2(c)(i)(D).
4.1.2(d)(i)(A)	VOM Requirements [T1] Limit.	C	Monitoring per Condition 4.1.2(d)(i)(A), Testing per Condition 4.1.2(d)(i)(B)-(C) and Recordkeeping per Condition 4.1.2(d)(i)(D).
4.1.2(e)(i)(A)	CO Requirements [T1] Limit.	I	Monitoring per Condition 4.1.2(e)(i)(A <sub>1</sub> ), Testing per Condition 4.1.2(e)(i)(A <sub>2</sub> )-(B) and Recordkeeping per Condition 4.1.2(e)(i)(A <sub>3</sub> ).
4.1.2(f)(i)(A)	NO <sub>x</sub> Requirements [T1] Limit.	C	Monitoring per Condition 4.1.2(f)(i)(A <sub>1</sub> ), Testing per Condition 4.1.2(f)(i)(A <sub>2</sub> )-(B) and Recordkeeping per Condition 4.1.2(f)(i)(A <sub>3</sub> ).
4.1.2(g)(i)(A)	Lead Requirements [T1] Limit,	C	Monitoring per Condition 4.1.2(g)(i)(A) and Recordkeeping per Condition 4.1.2(g)(i)(B).
4.1.2(h)(i)(A)	Annual Steel Production ≤ 112 T/hour and 750,000 T/year.	C	Monitoring per Condition 4.1.2(h)(i)(A)-(B) and Recordkeeping per Condition 4.1.2(h)(i)(C).
4.1.2(i)(i)(A)	Work Practices related to emissions control system, Scrap Pollution Prevention Plan and EMS building inspections.	C	Monthly operational inspections and Recordkeeping.
4.1.4(a)-4.1.5	Malfunction/Breakdown provisions for EMS.	C	Detailed recordkeeping of periods of operation during malfunction/breakdown with excess emissions.
4.2.2(a)(i)	LMF Opacity ≤ 30% per 35 IAC 212.123(a).	C	Monthly Method 9 opacity observations, monthly inspections of LMF Baghouse and Recordkeeping.
4.2.2(b)(i)	PM Requirements per 35 IAC 212.321(a) and [T1] Limits.	C	Recordkeeping.
4.2.2(c)(i)	SO <sub>2</sub> Limits per 35 IAC 214.301 and [T1] Limits.	C	Monitoring per Condition 4.2.2(c)(i)(A), Testing per Condition 4.2.2(c)(i)(B)-(C) and Recordkeeping per Condition 4.2.2(c)(i)(D).
4.2.2(d)(i)	VOM Requirements [T1] Limit.	C	Monitoring per Condition 4.2.2(d)(i)(A) and Recordkeeping per Condition 4.2.2(d)(i)(B).
4.2.2(e)(i)	NO <sub>x</sub> Requirements [T1] Limit.	C	Monitoring per Condition 4.2.2(e)(i)(A) and Recordkeeping per Condition 4.2.2(e)(i)(B).
4.2.2(f)(i)	CO Requirements [T1] Limit.	C	Recordkeeping.
4.2.2(g)(i)	Lead Requirements [T1] Limit.	C	Recordkeeping.

Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions

Source Name		Source I.D. Number	
ALTON STEEL, INC.		119010AAE	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
4.2.2(h)(i)	Work Practices related to LMF Baghouse.	C	Recordkeeping.
4.2.4(a)-4.2.5	Malfunction/Breakdown provisions for LMF.	C	Detailed recordkeeping of periods of operation during malfunction/breakdown with excess emissions.
4.3.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a).	C	Recordkeeping.
4.3.2(b)(i)	PM Requirements per 35 IAC 212.322(a) and [T1] Limits.	C	Recordkeeping.
4.3.2(c)(i)	SO <sub>2</sub> Limits per 35 IAC 214.301 and [T1] Limits.	C	Recordkeeping.
4.3.2(d)(i)	VOM Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(e)(i)	NO <sub>x</sub> Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(f)(i)	CO Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(g)(i)	Lead Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(h)(i)	Work Practices related to EAF Baghouse.	C	Recordkeeping.
4.4.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a).	C	Annual Method 9 Opacity observations and Recordkeeping.
4.4.2(b)(i)	PM Requirements per 35 IAC 212.322(a) and [T1] Limits.	C	Recordkeeping.
4.4.2(c)(i)	CO Requirements [T1] Limit.	C	Recordkeeping.
4.4.2(d)(i)	NO <sub>x</sub> Requirements [T1] Limit.	C	Testing within 36 months, Recordkeeping.
4.4.2(e)(i)	VOM Requirements [T1] Limit.	C	Recordkeeping.
4.4.2(f)(i)	SO <sub>2</sub> Requirements [T1] Limits.	C	Recordkeeping.

Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions

Source Name		Source I.D. Number	
ALTON STEEL, INC.		119010AAE	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
4.4.2(g)(i)	Lead Requirements [T1] Limit.	C	Recordkeeping.
4.4.2(h)(i)	Annual Natural Gas Usage $\leq$ 1,130 mmscf.	C	Recordkeeping.
4.5.2(a)(i)	Opacity $\leq$ 30% per 35 IAC 212.123(a).	C	Monthly Method 9 Opacity observations, inspections and Recordkeeping.
4.5.2(b)(i)	PM Requirements per 35 IAC 212.322(a).	C	Monthly inspections and Recordkeeping.
4.6.2(a)(i)	Opacity $\leq$ 30% per 35 IAC 212.123(a) and no fugitive particulate matter at the property line.	C	Monthly Method 9 Opacity observations, Weekly Method 22 observations at the property line and Recordkeeping.
4.6.2(b)(i)	Work Practices and Control Requirements to reduce Fugitive PM.	C	Work Practices from 35 IAC 212 Subpart K and Recordkeeping.
7.5(a)	CAM Plan for EAF #7.	C	Monitoring and Recordkeeping as specified in CAM Plan Table 7.5.1.

**Table 2. Deviation Summary Report**

Source Name		Source I. D. Number						
ALTON STEEL INC.		119010AAE						
(1) Permit Condition Reference	(2) Description of Permit Condition	(3) Deviation Period Start Date	(4) Deviation Period End Date	(5) Description and Cause of Deviation	(6) Corrective Action(s) Taken to Remedy Deviation	(7) Measure(s) Taken to Prevent Future Deviations		
4.1.2(e)(i)(A)	CO ≤ 2.00 lb/T	1/1/2020	12/31/20	CO higher than limit based on a stack test in 2019	Process Monitoring	Working on a Permit modification		
4.1.2(e)(i)(A)	CO ≤ 224.0 lb/hr	1/1/2020	12/31/20	CO higher than limit based on a stack test in 2019	Process Monitoring	Working on a Permit modification		



## ATTACHMENT 6) 2021 ACC

#5 Cut Street

Alton, IL 62002

618 463-4490

---

April 25, 2022

Illinois EPA, Bureau of Air  
Compliance & Enforcement Section (MC 40)  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

Re: ID No. 119010AAE, Permit No. 96020056

In re: CAAPP Permit Annual Compliance Certification

Dear Sir/Madam:

Attached please find ASI's CAAPP Permit Annual Compliance Certification for calendar year 2020. ASI was in noncompliance with Condition 4.1.2(e)(i)(A), CO limits for pounds per ton and pounds per hour emissions based on the results of a stack test on October 23-24, 2019. ASI is currently working with the IEPA Compliance Section, the IEPA Division of Legal Counsel, and IEPA Bureau of Air Permitting Sections to modify our Title V and/or Title I Permits to allow compliance with the limits discussed above.

If you have any questions, feel free to call me at 618-374-3570.

Sincerely,

A handwritten signature in black ink that reads 'Matt Gill'.

Matt Gill, PE  
Director, Environmental Compliance

cc: IEPA Collinsville Regional Office

RECEIVED  
STATE OF ILLINOIS

APR 27 2022

ENVIRONMENTAL PROTECTION AGENCY  
BUREAU OF AIR

IEPA-DIVISION OF RECORDS MANAGEMENT  
RELEASABLE

JUN 08 2022

REVIEWER: SAB



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
 DIVISION OF AIR POLLUTION CONTROL  
 COMPLIANCE AND SYSTEMS MANAGEMENT SECTION  
 1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276  
 SPRINGFIELD, ILLINOIS 62794-9276

<b>CAAPP ANNUAL COMPLIANCE CERTIFICATION</b>	<b>FOR AGENCY USE ONLY</b>
	ID NUMBER:
	PERMIT #:
DATE:	

THE CLEAN AIR ACT PERMIT PROGRAM (CAAPP) REQUIRES THAT EACH CAAPP PERMIT HOLDER SUBMIT AN ANNUAL COMPLIANCE CERTIFICATION FOR ALL EMISSION UNITS AT THE SOURCE AS REQUIRED BY 40 CFR 70.6 (c) (5), 39.5 (7) (p) (v) OF THE ENVIRONMENTAL PROTECTION ACT AND CAAPP PERMIT CONDITION 9.8. THE COMPLIANCE CERTIFICATION REPORTING PERIOD IS JANUARY 1 TO DECEMBER 31 AND IS DUE ON OR BEFORE MAY 1 FOR THE PRECEDING CALENDAR YEAR. THIS CERTIFICATION FORM CAN BE USED BY FACILITIES TO SATISFY THIS REQUIREMENT.

<b>SOURCE INFORMATION</b>		
1) SOURCE NAME: ALTON STEEL, INC.		
2) SOURCE ADDRESS: #5 CUT STREET		
3) CITY: ALTON	4) COUNTY: MADISON	
5) TOWNSHIP:	6) STATE: IL	7) ZIP CODE: 62002
8) DATE FORM PREPARED: 04/22/22	9) SOURCE ID NO. : 119010AAE	
10) CAAPP PERMIT NO.: 96020056		
11) CALENDAR YEAR OR REPORTING PERIOD COVERED BY THIS REPORT: 2021		

<b>SOURCE COMPLIANCE INFORMATION</b>
12) CHECK EITHER (a) OR (b) BELOW:  (a) _____ During the entire reporting period, this source was in <b>continuous</b> compliance with ALL terms and conditions contained in its CAAPP permit. The method used to determine compliance for each term and condition is the method specified in the permit.  <hr/> (b) <input checked="" type="checkbox"/> With the exception of the items identified in Table 1 and Table 2, this source was in <b>continuous</b> compliance with all terms and conditions contained in the permit. The method used to determine compliance for each term and condition is the method specified in the permit, unless otherwise indicated.  <b>NOTE: Table 1 must be completed for all units and activities regardless of compliance status. Table 2 must be completed for all sources of intermittent or continuous noncompliance with any permit condition.</b>

Printed on Recycled Paper  
401-CAAPP

IEPA-DIVISION OF RECORDS MANAGEMENT  
 RELEASEABLE  
 JUN 08 2022  
 REVIEWER: SAB

**ATTACHMENTS**

13) Are you submitting any attachments with this report? Yes  No

If yes, please list the attachments below:

**COMPLIANCE CERTIFICATION REPORT MAILING**

14) In addition to submitting the Compliance Certification report to the Compliance and Systems Management Section (CASM), a copy of the Compliance Certification report must also be submitted to the USEPA Region 5 and the appropriate IEPA regional field office. Addresses are listed in condition 8.6 of your CAAPP permit.

Please check the appropriate boxes.

A copy of the Compliance Certification report has been submitted to USEPA.

Yes  No

A copy of the Compliance Certification report has been submitted to the appropriate IEPA regional field office.

Yes  No

**SOURCE CONTACT PERSON**

15) NAME OF TECHNICAL CONTACT PERSON FOR THIS REPORT: MATT GILL

16) TECHNICAL CONTACT PERSON TITLE:  
Director, Environmental Compliance

17) CONTACT PERSON'S TELEPHONE NUMBER:  
(618) 374-3570

**COMPLIANCE STATEMENT AND SIGNATURE BLOCK**

NOTE: A RESPONSIBLE OFFICIAL MUST SIGN THIS COMPLIANCE CERTIFICATION. UNSIGNED COMPLIANCE CERTIFICATIONS WILL BE RETURNED AS INCOMPLETE.

18) I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

AUTHORIZED SIGNATURE:

BY: James Hrusovsky  
AUTHORIZED SIGNATURE  
James Hrusovsky

TYPED OR PRINTED NAME OF SIGNATORY

President & CEO  
TITLE OF SIGNATORY  
4 / 25 / 2022  
DATE

**Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions**

Source Name		Source I.D. Number	
ALTON STEEL, INC.		119010AAE	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
3.1(a)(i)	No fugitive emissions beyond property line per 35 IAC 212.301 and 212.314.	C	Recordkeeping
3.1(b)	Ozone depleting substance requirements per 40 CFR Part 82.	C	Recordkeeping
3.1(c)	Asbestos Demolition and Renovation.	C	Recordkeeping
3.1(d)	Future Emission Standards.	C	Recordkeeping
3.2(a)	Fugitive PM Operating Program requirements per 35 IAC 212.	C	Plan maintained at the source; recordkeeping of activities
3.2(b)	PM <sub>10</sub> Contingency Measure Plan.	C	Recordkeeping, should the source become subject to the rule.
3.2(c)	Episode Action Plan, 35 IAC 244.	C	Plan maintained at the source and filed with IEPA.
3.2(d)	Risk Management Plan, 40 CFR Part 68.	C	Recordkeeping, should the source become subject to the rule.
3.2(e)	Scrap Pollution Prevention Plan.	C	Plan maintained at the source and filed with IEPA and recordkeeping.
3.2(f)	Site-Specific Plan for Mercury Switches.	C	Plan maintained at the source and filed with IEPA and recordkeeping.
3.5(a)	Prompt Reporting.	C	Recordkeeping
3.5(b)	Semiannual Reporting.	C	Recordkeeping
3.5(c)	Annual Emissions Report.	C	Recordkeeping
3.5(d)	Federal Reporting for Scrap Control.	C	Recordkeeping
4.1.2(a)(i)(A)	Opacity <6% per 40 CFR 63.10686(b)(2).	C	Method 9 observations 3 times per 7 operating days per Condition 4.1.2(a)(i)(A)(i), recordkeeping per Condition 4.1.2(a)(i)(C)-(D).
4.1.2(a)(ii)(B)	Opacity from Control Devices ≤3% [TJ] Limit.	C	Method 9 observations 3 times per 7 operating days per Condition 4.1.2(a)(ii)(B)(i), recordkeeping per Condition 4.1.2(a)(i)(C)-(D).



**Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions**

Source Name		Source I.D. Number	
ALTON STEEL, INC.		119010AAE	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
4.1.2(b)(i)(A)-(D)	PM Requirements per 40 CFR 63.10686(b)(1), [T1] Limit and 35 IAC 212.448.	C	Monitoring per Condition 4.1.2(b)(ii)(A)-(D), Testing per Condition 4.1.2(b)(ii)(E)-(F) and Recordkeeping per Condition 4.1.2(b)(ii)(G)-(H).
4.1.2(c)(i)(A)	SO <sub>2</sub> Limits per 35 IAC 214.301 and [T1] Limits.	C	Monitoring per Condition 4.1.2(c)(ii)(A), Testing per Condition 4.1.2(c)(ii)(B)-(C) and Recordkeeping per Condition 4.1.2(c)(ii)(D).
4.1.2(d)(i)(A)	VOM Requirements [T1] Limit.	C	Monitoring per Condition 4.1.2(d)(ii)(A), Testing per Condition 4.1.2(d)(ii)(B)-(C) and Recordkeeping per Condition 4.1.2(d)(ii)(D).
4.1.2(e)(i)(A)	CO Requirements [T1] Limit.	N	Monitoring per Condition 4.1.2(e)(ii)(A), Testing per Condition 4.1.2(e)(ii)(A <sub>2</sub> )-(B) and Recordkeeping per Condition 4.1.2(e)(ii)(A <sub>3</sub> ).
4.1.2(f)(i)(A)	NOx Requirements [T1] Limit.	C	Monitoring per Condition 4.1.2(f)(ii)(A <sub>1</sub> ), Testing per Condition 4.1.2(f)(ii)(A <sub>2</sub> )-(B) and Recordkeeping per Condition 4.1.2(f)(ii)(A <sub>3</sub> ).
4.1.2(g)(i)(A)	Lead Requirements [T1] Limit.	C	Monitoring per Condition 4.1.2(g)(ii)(A) and Recordkeeping per Condition 4.1.2(g)(ii)(B).
4.1.2(h)(i)(A)	Annual Steel Production ≤ 112 T/hour and 750,000 T/Year.	C	Monitoring per Condition 4.1.2(h)(ii)(A)-(B) and Recordkeeping per Condition 4.1.2(h)(ii)(C).
4.1.2(i)(i)(A)	Work Practices related to emissions control system, Scrap Pollution Prevention Plan and EMS building inspections.	C	Monthly operational inspections and Recordkeeping.
4.1.4(a)-4.1.5	Malfunction/Breakdown provisions for EMS.	C	Detailed recordkeeping of periods of operation during malfunction/breakdown with excess emissions.
4.2.2(a)(i)	LMF Opacity ≤ 30% per 35 IAC 212.123(a).	C	Monthly Method 9 opacity observations, monthly inspections of LMF Baghouse and Recordkeeping.
4.2.2(b)(i)	PM Requirements per 35 IAC 212.321(a) and [T1] Limits.	C	Recordkeeping.
4.2.2(c)(i)	SO <sub>2</sub> Limits per 35 IAC 214.301 and [T1] Limits.	C	Monitoring per Condition 4.2.2(c)(ii)(A), Testing per Condition 4.2.2(c)(ii)(B)-(C) and Recordkeeping per Condition 4.2.2(c)(ii)(D).
4.2.2(d)(i)	VOM Requirements [T1] Limit.	C	Monitoring per Condition 4.2.2(d)(ii)(A) and Recordkeeping per Condition 4.2.2(d)(ii)(B).
4.2.2(e)(i)	NOx Requirements [T1] Limit.	C	Monitoring per Condition 4.2.2(e)(ii)(A) and Recordkeeping per Condition 4.2.2(e)(ii)(B).
4.2.2(f)(i)	CO Requirements [T1] Limit.	C	Recordkeeping.
4.2.2(g)(i)	Lead Requirements [T1] Limit.	C	Recordkeeping.

**Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions**

Source Name		Source I.D. Number	
ALTON STEEL, INC.		119010AAE	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
4.2.2(b)(i)	Work Practices related to LMF Baghouse.	C	Recordkeeping.
4.2.4(a)-4.2.5	Malfunction/Breakdown provisions for LMF.	C	Detailed recordkeeping of periods of operation during malfunction/breakdown with excess emissions.
4.3.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a).	C	Recordkeeping.
4.3.2(b)(i)	PM Requirements per 35 IAC 212.322(a) and [T1] Limits.	C	Recordkeeping.
4.3.2(c)(i)	SO <sub>2</sub> Limits per 35 IAC 214.301 and [T1] Limits.	C	Recordkeeping.
4.3.2(d)(i)	VOM Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(e)(i)	NO <sub>x</sub> Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(f)(i)	CO Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(g)(i)	Lead Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(h)(i)	Work Practices related to EAF Baghouse.	C	Recordkeeping.
4.4.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a).	C	Annual Method 9 Opacity observations and Recordkeeping.
4.4.2(b)(i)	PM Requirements per 35 IAC 212.322(a) and [T1] Limits.	C	Recordkeeping.
4.4.2(c)(i)	CO Requirements [T1] Limit.	C	Recordkeeping.
4.4.2(d)(i)	NO <sub>x</sub> Requirements [T1] Limit.	C	Testing within 36 months, Recordkeeping.
4.4.2(e)(i)	VOM Requirements [T1] Limit.	C	Recordkeeping.
4.4.2(f)(i)	SO <sub>2</sub> Requirements [T1] Limits.	C	Recordkeeping.

Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions

Source Name	Source I.D. Number		
ALTON STEEL, INC.	119010AAE		
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
4.4.2(g)(i)	Lead Requirements [T1] Limit.	C	Recordkeeping.
4.4.2(h)(i)	Annual Natural Gas Usage ≤ 1,130 mmscf.	C	Recordkeeping.
4.5.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a).	C	Monthly Method 9 Opacity observations, inspections and Recordkeeping.
4.5.2(b)(i)	PM Requirements per 35 IAC 212.322(a).	C	Monthly Inspections and Recordkeeping.
4.6.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a) and no fugitive particulate matter at the property line.	C	Monthly Method 9 Opacity observations, Weekly Method 22 observations at the property line and Recordkeeping.
4.6.2(b)(i)	Work Practices and Control Requirements to reduce Fugitive PM.	C	Work Practices from 35 IAC 212 Subpart K and Recordkeeping.
7.5(a)	CAM Plan for EAF #7.	C	Monitoring and Recordkeeping as specified in CAM Plan Table 7.5.1.

**Table 2. Deviation Summary Report**

Source Name		Source I. D. Number					
ALTON STEEL INC.		119010AAE					
(1) Permit Condition Reference	(2) Description of Permit Condition	(3) Deviation Period Start Date	(4) Deviation Period End Date	(5) Description and Cause of Deviation	(6) Corrective Action(s) Taken to Remedy Deviation	(7) Measure(s) Taken to Prevent Future Deviations	
4.1.2(e)(i)(A)	EAF CO Emissions	1/1/2021	12/31/2021	CO emissions > limit for lbs/ton and pounds/hr on EAF	Working on appl. for mod. to Title I permit to increase CO limits.		



#5 Cut Street

Alton, IL 62002

618 463-4490

April 20, 2023

Illinois EPA, Bureau of Air  
Compliance & Enforcement Section (MC 40)  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

RECEIVED  
STATE OF ILLINOIS

APR 25 2023

ENVIRONMENTAL PROTECTION AGENCY  
BUREAU OF AIR

Re: ID No. 119010AAE, Permit No. 96020056

In re: CAAPP Permit Annual Compliance Certification

Dear Sir/Madam:

Attached please find ASI's CAAPP Permit Annual Compliance Certification for calendar year 2022. ASI was in noncompliance with Condition 4.1.2(e)(i)(A), CO limits for pounds per ton and pounds per hour emissions based on the results of a stack test on October 23-24, 2019. ASI is currently working with the IEPA Compliance Section, the IEPA Division of Legal Counsel, and IEPA Bureau of Air Permitting Sections to allow compliance with the limits discussed above.

We were also in intermittent compliance with Condition 4.1.2(b)(i)(D), PM limits for pounds per ton based on the results of a stack test on January 11-12, 2022. Following replacement of several bags in our baghouse, we retested PM on April 26-27, 2022, and were fully in compliance with PM limits.

IEPA - DIVISION OF RECORDS MANAGEMENT  
RELEASABLE

If you have any questions, feel free to call me at 618-374-3570.

Sincerely,

A handwritten signature in black ink that reads "Matt Gill".

Matt Gill, PE  
Director, Environmental Compliance

AUG 07 2023

REVIEWER: RDH

cc: IEPA Collinsville Regional Office



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
 DIVISION OF AIR POLLUTION CONTROL  
 COMPLIANCE AND SYSTEMS MANAGEMENT SECTION  
 1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276  
 SPRINGFIELD, ILLINOIS 62794-9276

<b>CAAPP ANNUAL COMPLIANCE CERTIFICATION</b>	<i>FOR AGENCY USE ONLY.</i>
	ID NUMBER:
	PERMIT #:
	DATE:

THE CLEAN AIR ACT PERMIT PROGRAM (CAAPP) REQUIRES THAT EACH CAAPP PERMIT HOLDER SUBMIT AN ANNUAL COMPLIANCE CERTIFICATION FOR ALL EMISSION UNITS AT THE SOURCE AS REQUIRED BY 40 CFR 70.6 (c) (5), 39.5 (7) (p) (v) OF THE ENVIRONMENTAL PROTECTION ACT AND CAAPP PERMIT CONDITION 9.8. THE COMPLIANCE CERTIFICATION REPORTING PERIOD IS JANUARY 1 TO DECEMBER 31 AND IS DUE ON OR BEFORE MAY 1 FOR THE PRECEDING CALENDAR YEAR. THIS CERTIFICATION FORM CAN BE USED BY FACILITIES TO SATISFY THIS REQUIREMENT.

<b>SOURCE INFORMATION</b>		
1) SOURCE NAME: ALTON STEEL, INC.		
2) SOURCE ADDRESS: #5 CUT STREET		
3) CITY: ALTON	4) COUNTY: MADISON	
5) TOWNSHIP:	6) STATE: IL	7) ZIP CODE: 62002
8) DATE FORM PREPARED: 04/20/23	9) SOURCE ID NO.: 119010AAE	
10) CAAPP PERMIT NO.: 96020056		
11) CALENDAR YEAR OR REPORTING PERIOD COVERED BY THIS REPORT: 2022		

<b>SOURCE COMPLIANCE INFORMATION</b>
12) CHECK EITHER (a) OR (b) BELOW:
(a) _____ During the entire reporting period, this source was in <b>continuous</b> compliance with ALL terms and conditions contained in its CAAPP permit. The method used to determine compliance for each term and condition is the method specified in the permit.
(b) <input checked="" type="checkbox"/> With the exception of the items identified in Table 1 and Table 2, this source was in <b>continuous</b> compliance with all terms and conditions contained in the permit. The method used to determine compliance for each term and condition is the method specified in the permit, unless otherwise indicated.
<b>NOTE: Table 1 must be completed for all units and activities regardless of compliance status. Table 2 must be completed for all sources of intermittent or continuous noncompliance with any permit condition.</b>

**ATTACHMENTS**

13) Are you submitting any attachments with this report? Yes  No

If yes, please list the attachments below:

Table 1.

**COMPLIANCE CERTIFICATION REPORT MAILING**

14) In addition to submitting the Compliance Certification report to the Compliance and Systems Management Section (CASM), a copy of the Compliance Certification report must also be submitted to the USEPA Region 5 and the appropriate IEPA regional field office. Addresses are listed in condition 8.6 of your CAAPP permit.

Please check the appropriate boxes.

A copy of the Compliance Certification report has been submitted to USEPA.

Yes  No

A copy of the Compliance Certification report has been submitted to the appropriate IEPA regional field office.

Yes  No

**SOURCE CONTACT PERSON**

15) NAME OF TECHNICAL CONTACT PERSON FOR THIS REPORT: MATT GILL

16) TECHNICAL CONTACT PERSON TITLE:  
Director, Environmental Compliance

17) CONTACT PERSON'S TELEPHONE NUMBER:  
(618) 374-3570


**COMPLIANCE STATEMENT AND SIGNATURE BLOCK**

NOTE: A RESPONSIBLE OFFICIAL MUST SIGN THIS COMPLIANCE CERTIFICATION. UNSIGNED COMPLIANCE CERTIFICATIONS WILL BE RETURNED AS INCOMPLETE.

18) I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

AUTHORIZED SIGNATURE:

BY:

  
\_\_\_\_\_  
AUTHORIZED SIGNATURE  
James Hrusovsky

TYPED OR PRINTED NAME OF SIGNATORY

President & CEO

\_\_\_\_\_  
TITLE OF SIGNATORY

4, 20, 2023

\_\_\_\_\_  
DATE

Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions

Source Name		Source I.D. Number		
ALTON STEEL, INC.		119010AAE		
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method	
3.1(a)(i)	No fugitive emissions beyond property line per 35 IAC 212.301 and 212.314.	C	Recordkeeping	
3.1(b)	Ozone depleting substance requirements per 40 CFR Part 82.	C	Recordkeeping	
3.1(c)	Asbestos Demolition and Renovation.	C	Recordkeeping	
3.1(d)	Future Emission Standards.	C	Recordkeeping	
3.2(a)	Fugitive PM Operating Program requirements per 35 IAC 212.	C	Plan maintained at the source; recordkeeping of activities	
3.2(b)	PM10 Contingency Measure Plan.	C	Recordkeeping, should the source become subject to the rule.	
3.2(c)	Episode Action Plan, 35 IAC 244.	C	Plan maintained at the source and filed with IEPA.	
3.2(d)	Risk Management Plan, 40 CFR Part 68.	C	Recordkeeping, should the source become subject to the rule.	
3.2(e)	Scrap Pollution Prevention Plan.	C	Plan maintained at the source and filed with IEPA and recordkeeping.	
3.2(f)	Site-Specific Plan for Mercury Switches.	C	Plan maintained at the source and filed with IEPA and recordkeeping.	
3.5(a)	Prompt Reporting.	C	Recordkeeping	
3.5(b)	Semiannual Reporting.	C	Recordkeeping	
3.5(c)	Annual Emissions Report.	C	Recordkeeping	
3.5(d)	Federal Reporting for Scrap Control.	C	Recordkeeping	
4.1.2(a)(i)(A)	Opacity <6% per 40 CFR 63.10686(b)(2).	C	Method 9 observations 3 times per 7 operating days per Condition 4.1.2(a)(ii)(A)(i), recordkeeping per Condition 4.1.2(a)(ii)(C)-(D).	
4.1.2(a)(i)(B)	Opacity from Control Devices ≤3% (T1) Limit.	C	Method 9 observations 3 times per 7 operating days per Condition 4.1.2(a)(ii)(B)(i), recordkeeping per Condition 4.1.2(a)(ii)(C)-(D).	



Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions

Source Name		Source I.D. Number	
ALTON STEEL, INC.		119010AAE	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
4.1.2(b)(i)(A)-(D)	PM Requirements per 40 CFR 63.10686(b)(1), [T1] Limit and 35 IAC 212.448.	I	Monitoring per Condition 4.1.2(b)(ii)(A)-(D), Testing per Condition 4.1.2(b)(ii)(E)-(F) and Recordkeeping per Condition 4.1.2(b)(ii)(G)-(H).
4.1.2(c)(i)(A)	SO <sub>2</sub> Limits per 35 IAC 214.301 and [T1] Limits.	C	Monitoring per Condition 4.1.2(c)(ii)(A), Testing per Condition 4.1.2(c)(ii)(B)-(C) and Recordkeeping per Condition 4.1.2(c)(ii)(D).
4.1.2(d)(i)(A)	VOM Requirements [T1] Limit.	C	Monitoring per Condition 4.1.2(d)(ii)(A), Testing per Condition 4.1.2(d)(ii)(B)-(C) and Recordkeeping per Condition 4.1.2(d)(ii)(D).
4.1.2(e)(i)(A)	CO Requirements [T1] Limit.	N	Monitoring per Condition 4.1.2(e)(ii)(A), Testing per Condition 4.1.2(e)(ii)(A <sub>2</sub> )-(B) and Recordkeeping per Condition 4.1.2(e)(ii)(A <sub>3</sub> ).
4.1.2(f)(i)(A)	NO <sub>x</sub> Requirements [T1] Limit.	C	Monitoring per Condition 4.1.2(f)(ii)(A <sub>1</sub> ), Testing per Condition 4.1.2(f)(ii)(A <sub>2</sub> )-(B) and Recordkeeping per Condition 4.1.2(f)(ii)(A <sub>3</sub> ).
4.1.2(g)(i)(A)	Lead Requirements [T1] Limit.	C	Monitoring per Condition 4.1.2(g)(ii)(A) and Recordkeeping per Condition 4.1.2(g)(ii)(B).
4.1.2(h)(i)(A)	Annual Steel Production ≤ 112 T/hour and 750,000 T/year.	C	Monitoring per Condition 4.1.2(h)(ii)(A)-(B) and Recordkeeping per Condition 4.1.2(h)(ii)(C).
4.1.2(i)(i)(A)	Work Practices related to emissions control system, Scrap Pollution Prevention Plan and EMS building inspections.	C	Monthly operational inspections and Recordkeeping.
4.1.4(a)-4.1.5	Malfunction/Breakdown provisions for EMS.	C	Detailed recordkeeping of periods of operation during malfunction/breakdown with excess emissions.
4.2.2(a)(i)	LMF Opacity ≤ 30% per 35 IAC 212.123(a).	C	Monthly Method 9 opacity observations, monthly inspections of LMF Baghouse and Recordkeeping.
4.2.2(b)(i)	PM Requirements per 35 IAC 212.321(a) and [T1] Limits.	C	Recordkeeping.
4.2.2(c)(i)	SO <sub>2</sub> Limits per 35 IAC 214.301 and [T1] Limits.	C	Monitoring per Condition 4.2.2(c)(ii)(A), Testing per Condition 4.2.2(c)(ii)(B)-(C) and Recordkeeping per Condition 4.2.2(c)(ii)(D).
4.2.2(d)(i)	VOM Requirements [T1] Limit.	C	Monitoring per Condition 4.2.2(d)(ii)(A) and Recordkeeping per Condition 4.2.2(d)(ii)(B).
4.2.2(e)(i)	NO <sub>x</sub> Requirements [T1] Limit.	C	Monitoring per Condition 4.2.2(e)(ii)(A) and Recordkeeping per Condition 4.2.2(e)(ii)(B).
4.2.2(f)(i)	CO Requirements [T1] Limit.	C	Recordkeeping.
4.2.2(g)(i)	Lead Requirements [T1] Limit.	C	Recordkeeping.

Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions

Source Name		Source I.D. Number	
ALTON STEEL, INC.		119010AAE	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
4.2.2(h)(i)	Work Practices related to LMF Baghouse.	C	Recordkeeping.
4.2.4(a)-4.2.5	Malfunction/Breakdown provisions for LMF.	C	Detailed recordkeeping of periods of operation during malfunction/breakdown with excess emissions.
4.3.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a).	C	Recordkeeping.
4.3.2(b)(i)	PM Requirements per 35 IAC 212.322(a) and [T1] Limits.	C	Recordkeeping.
4.3.2(c)(i)	SO <sub>2</sub> Limits per 35 IAC 214.301 and [T1] Limits.	C	Recordkeeping.
4.3.2(d)(i)	VOM Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(e)(i)	NO <sub>x</sub> Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(f)(i)	CO Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(g)(i)	Lead Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(h)(i)	Work Practices related to EAF Baghouse.	C	Recordkeeping.
4.4.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a).	C	Annual Method 9 Opacity observations and Recordkeeping.
4.4.2(b)(i)	PM Requirements per 35 IAC 212.322(a) and [T1] Limits.	C	Recordkeeping.
4.4.2(c)(i)	CO Requirements [T1] Limit.	C	Recordkeeping.
4.4.2(d)(i)	NO <sub>x</sub> Requirements [T1] Limit.	C	Testing within 36 months, Recordkeeping.
4.4.2(e)(i)	VOM Requirements [T1] Limit.	C	Recordkeeping.
4.4.2(f)(i)	SO <sub>2</sub> Requirements [T1] Limits.	C	Recordkeeping.

**Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions**

Source Name		Source I.D. Number	
ALTON STEEL, INC.		119010AAE	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
4.4.2(b)(i)	Lead Requirements [T1] Limit.	C	Recordkeeping.
4.4.2(h)(i)	Annual Natural Gas Usage ≤ 1,130 mmscf.	C	Recordkeeping.
4.5.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a).	C	Monthly Method 9 Opacity observations, inspections and Recordkeeping.
4.5.2(b)(i)	PM Requirements per 35 IAC 212.322(a).	C	Monthly Inspections and Recordkeeping.
4.6.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a) and no fugitive particulate matter at the property line.	C	Monthly Method 9 Opacity observations, Weekly Method 22 observations at the property line and Recordkeeping.
4.6.2(b)(i)	Work Practices and Control Requirements to reduce Fugitive PM.	C	Work Practices from 35 IAC 212 Subpart K and Recordkeeping.
7.5(a)	CAM Plan for EAF #7.	C	Monitoring and Recordkeeping as specified in CAM Plan Table 7.5.1.

**Table 2. Deviation Summary Report**

Source Name: ALTON STEEL INC. Source I. D. Number: 119010AAE

(1) Permit Condition Reference	(2) Description of Permit Condition	(3) Deviation Period Start Date	(4) Deviation Period End Date	(5) Description and Cause of Deviation	(6) Corrective Action(s) Taken to Remedy Deviation	(7) Measure(s) Taken to Prevent Future Deviations
4.1.2(e)(i)(A)	CO	1/1/22	12/31/22	CO emissions > 2.0 lbs/ton		
4.1.2(b)(i)(D)	PM	1/11/22	4/26/22	PM emissions > 0.19 lbs/ton, defective bags in baghouse	replaced defective bags in baghouse	Opacity readings per Condition 4.1.2(a)(i)

# ATTACHMENT 8) 2023 ACC



#5 Cut Street

Alton, IL 62002

618 463-4490

April 18, 2024

Illinois EPA, Bureau of Air  
Compliance & Enforcement Section (MC 40)  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

RECEIVED  
STATE OF ILLINOIS  
APR 30 2024  
ENVIRONMENTAL PROTECTION AGENCY  
BUREAU OF AIR

Re: ID No. 119010AAE, Permit No. 96020056

In re: CAAPP Permit Annual Compliance Certification

Dear Sir/Madam:

Attached please find ASI's CAAPP Permit Annual Compliance Certification for calendar year 2023. ASI was in noncompliance with Condition 4.1.2(e)(i)(A), CO limits for pounds per ton and pounds per hour emissions based on the results of a stack test on October 23-24, 2019. ASI is currently working with the IEPA Compliance Section, the IEPA Division of Legal Counsel, and IEPA Bureau of Air, Construction Permitting Sections to permit the installation of a replacement EAF that will be in compliance with the limits discussed above.

If you have any questions, feel free to call me at 618-374-3570.

Sincerely,

Matt Gill, PE  
Director, Environmental Compliance

IEPA  
Division of Records Management  
Releasable

JUN 12 2024

Reviewer: KAW

cc: IEPA Collinsville Regional Office



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
 DIVISION OF AIR POLLUTION CONTROL  
 COMPLIANCE AND SYSTEMS MANAGEMENT SECTION  
 1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276  
 SPRINGFIELD, ILLINOIS 62794-9276

<b>CAAPP ANNUAL COMPLIANCE CERTIFICATION</b>	<b>FOR AGENCY USE ONLY</b>
	ID NUMBER:
	PERMIT #:
	DATE:

THE CLEAN AIR ACT PERMIT PROGRAM (CAAPP) REQUIRES THAT EACH CAAPP PERMIT HOLDER SUBMIT AN ANNUAL COMPLIANCE CERTIFICATION FOR ALL EMISSION UNITS AT THE SOURCE AS REQUIRED BY 40 CFR 70.6 (c) (5), 39.5 (7) (p) (v) OF THE ENVIRONMENTAL PROTECTION ACT AND CAAPP PERMIT CONDITION 9.8. THE COMPLIANCE CERTIFICATION REPORTING PERIOD IS JANUARY 1 TO DECEMBER 31 AND IS DUE ON OR BEFORE MAY 1 FOR THE PRECEDING CALENDAR YEAR. THIS CERTIFICATION FORM CAN BE USED BY FACILITIES TO SATISFY THIS REQUIREMENT.

<b>SOURCE INFORMATION</b>		
1) SOURCE NAME: ALTON STEEL, INC.		
2) SOURCE ADDRESS: #5 CUT STREET		
3) CITY: ALTON	4) COUNTY: MADISON	
5) TOWNSHIP:	6) STATE: IL	7) ZIP CODE: 62002
8) DATE FORM PREPARED: 04/18/24	9) SOURCE ID NO.: 119010AAE	
10) CAAPP PERMIT NO.: 96020056		
11) CALENDAR YEAR OR REPORTING PERIOD COVERED BY THIS REPORT: 2023		

<b>SOURCE COMPLIANCE INFORMATION</b>
12) CHECK EITHER (a) OR (b) BELOW:
(a) _____ During the entire reporting period, this source was in <b>continuous</b> compliance with ALL terms and conditions contained in its CAAPP permit. The method used to determine compliance for each term and condition is the method specified in the permit.
(b) <input checked="" type="checkbox"/> With the exception of the items identified in Table 1 and Table 2, this source was in <b>continuous</b> compliance with all terms and conditions contained in the permit. The method used to determine compliance for each term and condition is the method specified in the permit, unless otherwise indicated.
<b>NOTE: Table 1 must be completed for all units and activities regardless of compliance status. Table 2 must be completed for all sources of intermittent or continuous noncompliance with any permit condition.</b>

**ATTACHMENTS**

13) Are you submitting any attachments with this report? Yes  No

If yes, please list the attachments below:

Table 1.

**COMPLIANCE CERTIFICATION REPORT MAILING**

14) In addition to submitting the Compliance Certification report to the Compliance and Systems Management Section (CASM), a copy of the Compliance Certification report must also be submitted to the USEPA Region 5 and the appropriate IEPA regional field office. Addresses are listed in condition 8.6 of your CAAPP permit.

Please check the appropriate boxes.

A copy of the Compliance Certification report has been submitted to USEPA.

Yes  No

A copy of the Compliance Certification report has been submitted to the appropriate IEPA regional field office.

Yes  No

**SOURCE CONTACT PERSON**

15) NAME OF TECHNICAL CONTACT PERSON FOR THIS REPORT: MATT GILL

16) TECHNICAL CONTACT PERSON TITLE:  
Director, Environmental Compliance

17) CONTACT PERSON'S TELEPHONE NUMBER:  
(618) 374-3570

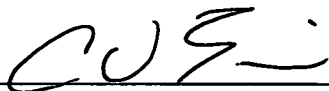
**COMPLIANCE STATEMENT AND SIGNATURE BLOCK**

NOTE: A RESPONSIBLE OFFICIAL MUST SIGN THIS COMPLIANCE CERTIFICATION. UNSIGNED COMPLIANCE CERTIFICATIONS WILL BE RETURNED AS INCOMPLETE.

18) I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

AUTHORIZED SIGNATURE:

BY:



AUTHORIZED SIGNATURE

Chris Ervin

TYPED OR PRINTED NAME OF SIGNATORY

President & CEO

TITLE OF SIGNATORY

4 / 18 / 2024

DATE

Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions

Source Name		Source I.D. Number	
ALTON STEEL, INC.		119010AAE	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
3.1(a)(i)	No fugitive emissions beyond property line per 35 IAC 212.301 and 212.314.	C	Recordkeeping
3.1(b)	Ozone depleting substance requirements per 40 CFR Part 82.	C	Recordkeeping
3.1(c)	Asbestos Demolition and Renovation.	C	Recordkeeping
3.1(d)	Future Emission Standards.	C	Recordkeeping
3.2(a)	Fugitive PM Operating Program requirements per 35 IAC 212.	C	Plan maintained at the source; recordkeeping of activities
3.2(b)	PM <sub>10</sub> Contingency Measure Plan.	C	Recordkeeping, should the source become subject to the rule.
3.2(c)	Episode Action Plan, 35 IAC 244.	C	Plan maintained at the source and filed with IEPA.
3.2(d)	Risk Management Plan, 40 CFR Part 68.	C	Recordkeeping, should the source become subject to the rule.
3.2(e)	Scrap Pollution Prevention Plan.	C	Plan maintained at the source and filed with IEPA and recordkeeping.
3.2(f)	Site-Specific Plan for Mercury Switches.	C	Plan maintained at the source and filed with IEPA and recordkeeping.
3.5(a)	Prompt Reporting.	C	Recordkeeping
3.5(b)	Semiannual Reporting.	C	Recordkeeping
3.5(c)	Annual Emissions Report.	C	Recordkeeping
3.5(d)	Federal Reporting for Scrap Control.	C	Recordkeeping
4.1.2(a)(i)(A)	Opacity <6% per 40 CFR 63.10686(b)(2).	C	Method 9 observations 3 times per 7 operating days per Condition 4.1.2(a)(ii)(A)(I), recordkeeping per Condition 4.1.2(a)(ii)(C)-(D).
4.1.2(a)(i)(B)	Opacity from Control Devices ≤3% [T1] Limit.	C	Method 9 observations 3 times per 7 operating days per Condition 4.1.2(a)(ii)(B)(I), recordkeeping per Condition 4.1.2(a)(ii)(C)-(D).



**Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions**

Source Name		Source I.D. Number	
ALTON STEEL, INC.		119010AAE	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
4.1.2(b)(i)(A)-(D)	PM Requirements per 40 CFR 63.10686(b)(1), [T1] Limit and 35 IAC 212.448.	C	Monitoring per Condition 4.1.2(b)(ii)(A)-(D), Testing per Condition 4.1.2(b)(iii)(E)-(F) and Recordkeeping per Condition 4.1.2(b)(iii)(G)-(H).
4.1.2(c)(i)(A)	SO <sub>2</sub> Limits per 35 IAC 214.301 and [T1] Limits.	C	Monitoring per Condition 4.1.2(c)(ii)(A), Testing per Condition 4.1.2(c)(iii)(B)-(C) and Recordkeeping per Condition 4.1.2(c)(iii)(D).
4.1.2(d)(i)(A)	VOM Requirements [T1] Limit.	C	Monitoring per Condition 4.1.2(d)(ii)(A), Testing per Condition 4.1.2(d)(iii)(B)-(C) and Recordkeeping per Condition 4.1.2(d)(iii)(D).
4.1.2(e)(i)(A)	CO Requirements [T1] Limit.	N	Monitoring per Condition 4.1.2(e)(ii)(A <sub>1</sub> ), Testing per Condition 4.1.2(e)(iii)(A <sub>2</sub> )-(B) and Recordkeeping per Condition 4.1.2(e)(iii)(A <sub>3</sub> ).
4.1.2(f)(i)(A)	NOx Requirements [T1] Limit.	C	Monitoring per Condition 4.1.2(f)(ii)(A <sub>1</sub> ), Testing per Condition 4.1.2(f)(iii)(A <sub>2</sub> )-(B) and Recordkeeping per Condition 4.1.2(f)(iii)(A <sub>3</sub> ).
4.1.2(g)(i)(A)	Lead Requirements [T1] Limit,	C	Monitoring per Condition 4.1.2(g)(ii)(A) and Recordkeeping per Condition 4.1.2(g)(iii)(B).
4.1.2(h)(i)(A)	Annual Steel Production ≤ 112 T/hour and 750,000 T/year.	C	Monitoring per Condition 4.1.2(h)(ii)(A)-(B) and Recordkeeping per Condition 4.1.2(h)(iii)(C).
4.1.2(i)(i)(A)	Work Practices related to emissions control system, Scrap Pollution Prevention Plan and EMS building inspections.	C	Monthly operational inspections and Recordkeeping.
4.1.4(a)-4.1.5	Malfunction/Breakdown provisions for EMS.	C	Detailed recordkeeping of periods of operation during malfunction/breakdown with excess emissions.
4.2.2(a)(i)	LMF Opacity ≤ 30% per 35 IAC 212.123(a).	C	Monthly Method 9 opacity observations, monthly inspections of LMF Baghouse and Recordkeeping.
4.2.2(b)(i)	PM Requirements per 35 IAC 212.321(a) and [T1] Limits.	C	Recordkeeping.
4.2.2(c)(i)	SO <sub>2</sub> Limits per 35 IAC 214.301 and [T1] Limits.	C	Monitoring per Condition 4.2.2(c)(ii)(A), Testing per Condition 4.2.2(c)(iii)(B)-(C) and Recordkeeping per Condition 4.2.2(c)(iii)(D).
4.2.2(d)(i)	VOM Requirements [T1] Limit.	C	Monitoring per Condition 4.2.2(d)(ii)(A) and Recordkeeping per Condition 4.2.2(d)(iii)(B).
4.2.2(e)(i)	NOx Requirements [T1] Limit.	C	Monitoring per Condition 4.2.2(e)(ii)(A) and Recordkeeping per Condition 4.2.2(e)(iii)(B).
4.2.2(f)(i)	CO Requirements [T1] Limit.	C	Recordkeeping.
4.2.2(g)(i)	Lead Requirements [T1] Limit.	C	Recordkeeping.

Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions

Source Name		Source I.D. Number	
ALTON STEEL, INC.		119010AAE	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
4.2.2(h)(i)	Work Practices related to LMF Baghouse.	C	Recordkeeping.
4.2.4(a)-4.2.5	Malfunction/Breakdown provisions for LMF.	C	Detailed recordkeeping of periods of operation during malfunction/breakdown with excess emissions.
4.3.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a).	C	Recordkeeping.
4.3.2(b)(i)	PM Requirements per 35 IAC 212.322(a) and [T1] Limits.	C	Recordkeeping.
4.3.2(c)(i)	SO <sub>2</sub> Limits per 35 IAC 214.301 and [T1] Limits.	C	Recordkeeping.
4.3.2(d)(i)	VOM Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(e)(i)	NO <sub>x</sub> Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(f)(i)	CO Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(g)(i)	Lead Requirements [T1] Limit.	C	Recordkeeping.
4.3.2(h)(i)	Work Practices related to EAF Baghouse.	C	Recordkeeping.
4.4.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a).	C	Annual Method 9 Opacity observations and Recordkeeping.
4.4.2(b)(i)	PM Requirements per 35 IAC 212.322(a) and [T1] Limits.	C	Recordkeeping.
4.4.2(c)(i)	CO Requirements [T1] Limit.	C	Recordkeeping.
4.4.2(d)(i)	NO <sub>x</sub> Requirements [T1] Limit.	C	Testing within 36 months, Recordkeeping.
4.4.2(e)(i)	VOM Requirements [T1] Limit.	C	Recordkeeping.
4.4.2(f)(i)	SO <sub>2</sub> Requirements [T1] Limits.	C	Recordkeeping.

Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions

Source Name		Source I.D. Number	
ALTON STEEL, INC.		119010AAE	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
4.4.2(g)(i)	Lead Requirements [T1] Limit.	C	Recordkeeping.
4.4.2(h)(i)	Annual Natural Gas Usage ≤ 1,130 mmscf.	C	Recordkeeping.
4.5.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a).	C	Monthly Method 9 Opacity observations, inspections and Recordkeeping.
4.5.2(b)(i)	PM Requirements per 35 IAC 212.322(a).	C	Monthly Inspections and Recordkeeping.
4.6.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a) and no fugitive particulate matter at the property line.	C	Monthly Method 9 Opacity observations, Weekly Method 22 observations at the property line and Recordkeeping.
4.6.2(b)(i)	Work Practices and Control Requirements to reduce Fugitive PM.	C	Work Practices from 35 IAC 212 Subpart K and Recordkeeping.
7.5(a)	CAM Plan for EAF #7.	C	Monitoring and Recordkeeping as specified in CAM Plan Table 7.5.1.

**Table 2. Deviation Summary Report**

Source Name					Source I.D. Number	
ALTON STEEL INC.					119010AAE	
(1) Permit Condition Reference	(2) Description of Permit Condition	(3) Deviation Period Start Date	(4) Deviation Period End Date	(5) Description and Cause of Deviation	(6) Corrective Action(s) Taken to Remedy Deviation	(7) Measure(s) Taken to Prevent Future Deviations
4.1.2(e)(i)(A)	CO <= 2.00 lb/ton	1/1/23	12/31/23	Incomplete combustion of CO gas		Construction Permit application for replacement EAF