

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.

Sincerely,

Rory Davis

Regulatory Development Unit

Illinois EPA, Bureau of Air

Attachments

## ATTACHMENT 1) 2017 Test Result Summary



#5 Cut Street

Alton, IL 62002

618 463-4490

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

MROMAN 26 ZULY 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 in 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,

Matt Gill, PE

Matt Gill

Director, Environmental Compliance

IEPA - DIVISION OF RECORDS MANAGEMENT RELEASABLE

FEB 1 5 2017

**REVIEWER: RDH** 

cc: IEPA Collinsville Regional Office

Alton Steel, Inc.

IEPA I.D. No.: 119010AAE Permit No.: 96020056

Evaluation Date: January 24, 2017

		Stack 1	esting Data	Evaluation		
Emission Unit	Pollutant	Last Test Result	Permit Limit	Units	Margin of Compliance	Subsequent Stack Test Due
		0.34	0.63	lb/T	46.0%	
	SO₂	24.2	70.6	lb/hr	65.7%	< 36 mo.
		32.3	236.25	T/yr	86.3%	
		0.38	0.7	lb/T	45.7%	
	NO <sub>x</sub>	26.8	78.4	lb/hr	65.8%	< 36 mo.
		36.1	56.25	T/yr	35.8%	
		1.39	2	lb/T	30.5%	
	co	99.7	224	lb/hr	55.5%	< 36 mo.
· ·		132.1	750	T/yr	82.4%	
Electric		0.04	0.15	lb/T	73.3%	
Arc	VOM	2.8	16.8	lb/hr	83.3%	< 60 mo.
Furnace		3.8	262.5	T/yr	98.6%	
		0.0004	0.0052	Gr/scfd	92.3%	
	PM <sub>10</sub>	1.32	21.4	lb/hr	93.8%	4 60 ma
	F 1V110	0.01	0.19	lb/T	94.7%	< 60 mo.
	į	0.95	75.2	T/yr	98.7%	
		0.0009	0.0052	Gr/scfd	82.7%	
	504	3.39	21.4	lb/hr	84.2%	1.60
	PM	0.04	0.19	lb/T	78.9%	< 60 mo.
		3.80	75.2	T/yr	94.9%	
		>0.05	0.1	lb/T	<50.0%	
LMF	so₂	>2.86	11.2	lb/hr	<74.5%	< 36 mo.
		>4.75	37.5	T/yr	<87.3%	

## TTACHMENT 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 0 6 2020

EMIRONMENTAL 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,

Matt Gill, PE

Matt Diss

Director, Environmental Compliance

cc: IEPA Collinsville Regional Office

PPA-DIVISION OF RECORDS MANAGEMENT

SUN 25 2020

REVIEWER: EMI

Alton Steel, Inc.

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

			Stack Testing	Data Evalu	Jation		·	
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
			0.11	0.63	lb/T	82.5%		
	SO₂	10/23/2019	9.8	70.6	lb/hr	86.1%	< 60 mo.	10/21/202
			42.9	236.25	T/yr*	81.8%		
		•	0.15	0.7	lb/T	.78.6%		
	NOx	10/23/2019	13.7	78.4	lb/hr	82.5%	< 60 mo.	10/21/202
			60.0	262.5	T/yr*	77.1%	1	
			2.7	2	lb/T	-35.0%		
	со	10/23/2019	242	224	lb/hr	-8.0%	< 36 mo.	10/22/202
Elastria			1060.0	750	T/yr*	-41.3%		,
Electric Arc			0.04	0.15	lb/T	73.3%		
Furnace	VOM	1/24/2017	2.8	16.8	lb/hr	83.3%	< 60 mo.	1/24/202
Fulfiace ,			3.8	262.5	T/yr*	98.6%		
			0.0004	0.0052	Gr/scfd	92.3%		
	PM <sub>10</sub>	1/24/2017	1.32	21.4	lb/hr	93.8%	1 .60	1/24/202
	10110	1/24/2017	0.01	0.19	lb/T	94.7%	< 60 mo.	1/24/2022
			0.95	75.2	T/yr*	98.7%	1	
			0.0009	0.0052	Gr/scfd	82.7%		
	PM	1/24/2017	3.39	21.4	lb/hr	84.2%		1/24/2021
	PIVI	1/24/2017	0.04	0.19	lb/T	78.9%	< 60 mo.	1/24/2022
. ,			3.80	75.2	T/yr*	94.9%	*	
			0.06	0.1	lb/T	40.0%		
LMF	SO₂	10/24/2019	5.4	11.2	lb/hr	51.8%	< 36 mo.	10/23/202
	.		23.70	37.5	T/yr*	36.8%		

 $<sup>^{\</sup>star}$  T/yr based on 8,760 operating hours per year at the tested emission and production rate.

MAY 1 4 2019

REVIEWER: SAB



**#5 Cut Street** 

Alton, IL 62002

618 463-4490

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

RECEIVED STATE OF ILLINOIS

MAY 0.1 2019

ENVIRONMENTAL PROTECTION AGENCY BUREAU OF AIR

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,

Matt Gill, PE

Matt Dice

Director, Environmental Compliance

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

MAY 1 4 2019

**REVIEWER: SAB** 

•		FOR AGENCY USE ONLY
CAAPP ANNUAL	ID NUMBER:	
COMPLIANCE CERTIFICATION	PERMIT#:	
	DATE:	
E CLEAN AIR ACT PERMIT PROGRAM (CAAPP) REQUIRES ISSION UNITS AT THE SOURCE AS REQUIRED BY 40 CFR THE COMPLIANCE CERTIFICATION REPORTING PERIOD AR. THIS CERTIFICATION FORM CAN BE USED BY FACILI	t 70.6 (c) (5), 39.5 (7) (p) (v) OF THE ENVIRO DIS JANUARY 1 TO DECEMBER 31 AND IS	DIMENTAL PROTECTION ACT AND CAAPP PERMIT CON
	SOURCE INFORMATION	
SOURCE NAME: ALTON STEEL, INC.		
SOURCE ADDRESS: #5 CUT STREET		
ALTON	4) COUNTY:	DISON
TOWNSHIP: 6) S	TATE:	7) ZIP CODE: 62002
DATE FORM PREPARED:	9) SOURCE ID NO	119010AAE
96020056		11,2 mg/2, 111.
) CALENDAR YEAR OR REPORTING PERIOD COVE	ERED BY THIS REPORT:	
2018		
2010		
	CE COMPLIANCE INFORMAT	ION
) CHECK EITHER (a) OR (b) BELOW:		
) $X$ During the entire reporting period	, this source was in continuous	s compliance with ALL terms and
y <u>y v</u> builing the entire reporting period	e method used to determine co	mpliance for each term and condition is
onditions contained in its CAAPP permit. Th		
onditions contained in its CAAPP permit. The method specified in the permit.	•	•
inditions contained in its CAAPP permit. Th		

ATTACHMENTS
13) Are you submitting any attachments with this report?  Yes  No  No
If we misses list the attachments helew
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 <u>USEPA Region 5</u> and the appropriate <u>IEPA regional field office</u> . 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: 17) CONTACT PERSON'S TELEPHONE NUMBER:
Director, Environmental Compliance (618) 374-3570
COMPLIANCE OTATEMENT AND CLONATURE RUCCY
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:
$\wedge$ $\wedge$ $\wedge$ $\wedge$
BY: President & CEO
BY: President & CEO  AUTHORIZED SIGNATURE TITLE OF SIGNATORY

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.	С	Recordkeeping
3.1(b)	Ozone depleting substance requirements per 40 CFR Part 82.	С	Recordkeeping
3.1(c)	Asbestos Demolition and Renovation.	С	Recordkeeping
3.1(d)	Future Emission Standards.	С	Recordkeeping
3.2(a)	Fugitive PM Operating Program requirements per 35 IAC 212.	С	Plan maintained at the source; recordkeeping of activities
3.2(b)	PM10 Contingency Measure Plan.	С	Recordkeeping, should the source become subject to the rule.
3.2(c)	Episode Action Plan, 35 IAC 244.	С	Plan maintained at the source and filed with IEPA.
3.2(d)	Risk Management Plan, 40 CFR Part 68.	С	Recordkeeping, should the source become subject to the rule.
3.2(e)	Scrap Pollution Prevention Plan.	С	Plan maintained at the source and filed with IEPA and recordkeeping.
3.2(f)	Site-Specific Plan for Mercury Switches.	С	Plan maintained at the source and filed with IEPA and recordkeeping.
3.5(a)	Prompt Reporting.	С	Recordkeeping
3.5(b)	Semiannual Reporting.	C	Recordkeeping
3.5(c)	Annual Emissions Report.	С	Recordkeeping
3.5(d)	Federal Reporting for Scrap Control.	С	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	J.W.		Source I.D. Number
ACION SIEEL,	IIV.		IISUIVARE
(1)	(2)	(3)	(4)
Permit	Description of	Compliance Status	
Condition	Permit Condition	Continuous "C"	Compliance Determination Method
Reference		Intermittent "I"	
Number		Noncompliance "N"	
4.1.2(b)(i)(A)-(D)	PM Requirements per 40 CFR 63.10686(b)(1), [T1]	J	Monitoring per Condition 4.1.2(b)(ii)(A)-(D), Testing per Condition 4.1.2(b)(ii)(E)-(F) and Recordkeeping per
	Limit and 35 IAC 212.448.		Condition 4.1.2(b)(ii)(G)-(H).
4.1.2(c)(i)(A)	502 Limits per 35 IAC 214.301 and [T1] Limits.	3	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.	Ú	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.	Ĵ	Monitoring per Condition 4.1.2(e)(ii)(A1), Testing per Condition 4.1.2(e)(ii)(A2)-(B) and Recordkeeping per Condition 4.1.2(e)(ii)(A3).
4.1.2(f)(i)(A)	NOx Requirements [T1] Limit.	U	Monitoring per Condition 4.1.2(f)(ii)(A1), Testing per Condition 4.1.2(f)(ii)(A2)-(B) and Recordkeeping per Condition 4.1.2(f)(ii)(A3).
4.1.2(g)(i)(A)	Lead Requirements [T1] Limit,	3	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.	J	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.	υ	Monthly operational inspections and Recordkeeping.
4.1.4(a)-4.1.5	Malfunction/Breakdown provisions for EMS.	U	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).	U	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.	U	Recordkeeping.
4.2.2(c)(i)	SO <sub>2</sub> Limits per 35 IAC 214.301 and [T1] Limits.	U	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.	U	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.	U	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.	J	Recordkeeping.
4.2.2(g)(i)	Lead Requirements [T1] Limit.	J	Recordkeeping.



Page 57 of 6

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

Source Name			Source I.D. Number
ALTON STEEL, INC.	INC.		119010AAE
(1)	(2)	(E) ·	<b>(b)</b>
Permit	Description of	Compliance Status	
Condition	Permit Condition	Continuous "C"	Compliance Determination Method
Reference	•	Intermittent "I"	
Number		Noncompliance "N"	
4.2.2(h)(i)	Work Practices related to LMF Baghouse.	U	Recordkeeping.
4.2.4(a)-4.2.5	Malfunction/Breakdown provisions for LMF.	U	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).	U	Recordkeeping.
4.3.2(b)(i)	PM Requirements per 35 IAC 212.322(a) and [T1] Limits.	U	Recordkeeping.
4.3.2(c)(i)	SO <sub>2</sub> Limits per 3S IAC 214.301 and [T1] Limits.	U	Recordkeeping.
4.3.2(d)(i)	VOM Requirements [T1] Limit.	U .	Recordkeeping.
4.3.2(e)(i)	NOx Requirements [T1] Limit.	U	Recordkeeping.
4.3.2(f)(i)	CO Requirements [T1] Limit.	J	Recordkeeping.
4.3.2(g)(i)	Lead Requirements [T1] Limit.	J	Recordkeeping.
4.3.2(h)(i)	Work Practices related to EAF Baghouse.	U	Recordkeeping.
4.4.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a).	J	Annual Method 9 Opacity observations and Recordkeeping.
4.4.2(b)(i)	PM Requirements per 3S IAC 212.322(a) and [T1] Limits.	O .	Recordkeeping.
4.4.2(c)(i)	CO Requirements (T1) Limit.	U	Recordkeeping.
4.4.2(d)(i)	NOx Requirements [T1] Limit.	J	Testing within 36 months, Recordkeeping.
4.4.2(e)(i)	VOM Requirements [T1] Limit.	3	Recordkeeping.
4.4.2(f)(i)	SO2 Requirements [T1] Limits.	C	Recordkeeping.

age 6 of 6.

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

Source Name		•	Source I.D. Number
ALTON STEEL, INC.	INC.		119010AAE
(1)	(2)	(3)	(4)
Permit	Description of	Compliance Status	
Condition	Permit Condition	Continuous "C"	Compliance Determination Method
Reference		Intermittent "I"	
Number		Noncompliance "N"	
4.4.2(g)(i)	Lead Requirements [T1] Limit.	U	Recordkeeping.
4.4.2(h)(i)	Annual Natural Gas Usage ≤ 1,130 mmscf.	U	Recordkeeping.
4.5.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a).	U	Monthly Method 9 Opacity observations, inspections and Recordkeeping.
4.5.2(b)(i)	PM Requirements per 35 IAC 212.322(a).	U	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.	U	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.	U	Work Practices from 35 IAC 212 Subpart K and Recordkeeping.
7.5(a)	CAM Plan for EAF #7.	U	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

Watt Lin

Director, Environmental Compliance

cc: IEPA Collinsville Regional Office

IEPR. DIVISION TO THE LEVENT STANDOLMENT

JULY: 2020

JULY: 2020

JULY: 2020



# 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

			JR AGENCY, USE ONLY
CAAPP ANNUAL		ID NUMBER:	
COMPLIANCE CERTIFIC	CATION	PERMIT#;	
		DATE:	
EMISSION UNITS AT THE SOURCE AS REQUIRED BY	/ 40 CFR 70.6 (c) (5), 39 PERIOD IS JANUARY 1	.5 (7) (p) (v) OF THE ENVIRONMI I TO DECEMBER 31 AND IS DUE	T AN ANNUAL COMPLIANCE CERTIFICATION FOR ALL ENTAL PROTECTION ACT AND CAAPP PERMIT CONDITION ON OR BEFORE MAY 1 FOR THE PRECEDING CALENDA
	SOURCE	E INFORMATION	
1) SOURCE NAME: ALTON STEEL, INC	C.		
2) SOURCE ADDRESS: #5 CUT STREE	 ≣T		
3) CITY: ALTON		4) COUNTY: MADIS	SON
5) TOWNSHIP:	6) STATE:		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 PERIO	D COVERED BY TH	IS REPORT:	
2019			
	SOURCE COMP	LIANCE INFORMATION	N
12) CHECK FITHER (a) OR (b) RELOW!			

12) CHECK EITHER (a) OR (b) BELOW:

(a) \_\_\_\_\_ During the entire reporting period, this source was in continuous 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 continuous 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.

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.

ATTAC	IMENTS
13) Are you submitting any attachments with this report?	Yes □ No ☒
If was inleased liet the attachments helow:	
If yes, please list the attachments below:	
•	
COMPLIANCE CERTIFIC	
14) In addition to submitting the Compliance Certification rep (CASM), a copy of the Compliance Certification report m appropriate <u>IEPA regional field office</u> . Addresses are list	ust also be submitted to the <u>USEPA Region 5</u> and the
Please check the appropriate boxes.	
A copy of the Compliance Certification report has been subr	nitted to USEPA.
Ye	s □ No ⊠
A copy of the Compliance Certification report has been subr	nitted to the appropriate IEPA regional field office.
Ye	s ⊠ Nò □
SOURCE CON	TACT PERSON
15) NAME OF TECHNICAL CONTACT PERSON FOR THIS REPORT:	•
	AATT GILL
16) TECHNICAL CONTACT PERSON TITLE:	17) CONTACT PERSON'S TELEPHONE NUMBER:
Director, Environmental Compliance	(618) 374-3570
COMPLIANCE STATEMEN	AND SIGNATURE BLOCK
NOTE: A RESPONSIBLE OFFICIAL MUST SIGN THIS COMPLIANCE CERTIFICAT INCOMPLETE.	
	sure that qualified personnel properly gathered and
AUTHORIZED SIGNATURE:	
BY: Jamy Am	President & CEO
AUTHORIZED SIGNATURE	, TITLE OF SIGNATORY
James Hrusovsky	<u>4</u> , 28, 2020
TYPED OR PRINTED NAME OF SIGNATORY	DATE

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

Source Name	-	•	Source I.D. Number
ALTON STEEL, INC.	INC.		119010AAE
(1)	(2)	(2)	(4)
Permit	Description of	Compliance Status	
Condition	Permit Condition	Continuous "C"	Compliance Determination Method
Reference		Intermittent "I"	
Number		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.	U	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)	502 Limits per 35 IAC 214.301 and [T1] Limits.	U	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.	J	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)(B).
4.1.2(e)(i)(A)	CO Requirements [T1] Limit.	_	Monitoring per Condition 4.1.2(e)(ii)(A1), Testing per Condition 4.1.2(e)(ii)(A2)-(B) and Recordkeeping per Condition 4.1.2(e)(ii)(A3).
4.1.2(f)(i)(A)	NOx Requirements [T1] Limit.	3	Monitoring per Condition 4.1.2(f)(ii)(A1), Testing per Condition 4.1.2(f)(ii)(A2)-(B) and Recordkeeping per Condition 4.1.2(f)(ii)(A3).
4.1.2(g)(i)(A)	Lead Requirements [T1] Limit,	<b>o</b> .	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.		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.	υ	Monthly operational inspections and Recordkeeping.
4.1.4(a)-4.1.5	Malfunction/Breakdown provisions for EMS.	U	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).	U	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.	U	Recordkeeping.
4.2.2(c)(i)	SO <sub>2</sub> Limits per 35 IAC 214.301 and [T1] Limits.	3	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.	υ	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.	U	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.	٥	Recordkeeping.
4.2.2(g)(i)	Lead Requirements [T1] Limit.	O .	Recordkeeping.

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### (2)   Compliance Condition   Permit Condition of Continuous Reference   Noncompliance   A.2.2(h)(i)   Work Practices related to LMF Baghouse.		source i.D. mailiber
Description of Permit Condition  Work Practices related to LMF Baghouse.  Malfunction/Breakdown provisions for LMF.  Opacity ≤ 30% per 35 IAC 212.123(a).  PM Requirements per 35 IAC 212.322(a) and [T1] Limits.  SO2 Limits per 35 IAC 214.301 and [T1] Limit.  NOx Requirements [T1] Limit.  CO Requirements [T1] Limit.  CO Requirements [T1] Limit.  Dopacity ≤ 30% per 35 IAC 212.123(a).  PM Requirements [T1] Limit.  CO Requirements [T1] Limit.  CO Requirements [T1] Limit.  CO Requirements [T1] Limit.  Nox Requirements [T1] Limit.		119010AAE
Description of Permit Condition  Work Practices related to LMF Baghouse.  Malfunction/Breakdown provisions for LMF.  Opacity ≤ 30% per 35 IAC 212.123(a).  PM Requirements per 35 IAC 212.322(a) and [T1] Limits.  SO2 Limits per 35 IAC 214.301 and [T1] Limits.  VOM Requirements [T1] Limit.  CO Requirements [T1] Limit.  CO Requirements [T1] Limit.  Lead Requirements [T1] Limit.  Dopacity ≤ 30% per 35 IAC 212.322(a) and [T1] Limits.  CO Requirements [T1] Limit.  CO Requirements [T1] Limit.  CO Requirements [T1] Limit.  VOM Requirements [T1] Limit.	(3)	(4)
work Practices related to LMF Baghouse.  Work Practices related to LMF Baghouse.  Malfunction/Breakdown provisions for LMF.  Opacity ≤ 30% per 35 IAC 212.123(a).  PM Requirements per 35 IAC 212.322(a) and [T1] Limits.  SO₂ Limits per 35 IAC 214.301 and [T1] Limits.  NOX Requirements [T1] Limit.  CO Requirements [T1] Limit.  Lead Requirements [T1] Limit.  CO Requirements [T1] Limit.  Doacity ≤ 30% per 35 IAC 212.123(a).  PM Requirements per 35 IAC 212.322(a) and [T1] Limits.  CO Requirements [T1] Limit.  NOX Requirements [T1] Limit.	•	
Work Practices related to LMF Baghouse.  Malfunction/Breakdown provisions for LMF.  Opacity ≤ 30% per 35 IAC 212.123(a).  PM Requirements per 35 IAC 212.322(a) and [T1] Limits.  SO₂ Limits per 35 IAC 214.301 and [T1] Limits.  VOM Requirements [T1] Limit.  CO Requirements [T1] Limit.  Lead Requirements [T1] Limit.  Lead Requirements [T1] Limit.  Dpacity ≤ 30% per 35 IAC 212.123(a).  PM Requirements [T1] Limit.  CO Requirements [T1] Limit.  CO Requirements [T1] Limit.  CO Requirements [T1] Limit.		Compliance Determination Method
Work Practices related to LMF Baghouse.  Malfunction/Breakdown provisions for LMF.  Opacity ≤ 30% per 35 IAC 212.123(a).  PM Requirements per 35 IAC 212.322(a) and [T1] Limits.  SO₂ Limits per 35 IAC 214.301 and [T1] Limits.  NOM Requirements [T1] Limit.  CO Requirements [T1] Limit.  Work Practices related to EAF Baghouse.  Opacity ≤ 30% per 35 IAC 212.123(a).  PM Requirements [T1] Limit.  CO Requirements [T1] Limit.  CO Requirements [T1] Limit.  CO Requirements [T1] Limit.	Intermittent "I"	
Work Practices related to LMF Baghouse.  Malfunction/Breakdown provisions for LMF.  Opacity ≤ 30% per 35 IAC 212.123(a).  PM Requirements per 35 IAC 212.322(a) and [T1] Limits.  SO₂ Limits per 35 IAC 214.301 and [T1] Limits.  NOx Requirements [T1] Limit.  CO Requirements [T1] Limit.  Work Practices related to EAF Baghouse.  Opacity ≤ 30% per 35 IAC 212.123(a).  PM Requirements [T1] Limit.  CO Requirements [T1] Limit.  Nox Requirements [T1] Limit.  Nox Requirements [T1] Limit.  CO Requirements [T1] Limit.	Noncompliance "N"	
Malfunction/Breakdown provisions for LMF.  Opacity ≤ 30% per 35 IAC 212.123(a).  PIM Requirements per 35 IAC 212.322(a) and [T1] Limits.  SO2 Limits per 35 IAC 214.301 and [T1] Limit.  NOX Requirements [T1] Limit.  CO Requirements [T1] Limit.  Lead Requirements [T1] Limit.  Work Practices related to EAF Baghouse.  Opacity ≤ 30% per 35 IAC 212.123(a).  PIM Requirements per 35 IAC 212.322(a) and [T1] Limits.  CO Requirements [T1] Limit.  CO Requirements [T1] Limit.	ghouse. C	Recordkeeping.
Opacity ≤ 30% per 35 IAC 212.123(a).  PM Requirements per 35 IAC 212.322(a) and [T1] Limits.  SO₂ Limits per 35 IAC 214.301 and [T1] Limits.  VOM Requirements [T1] Limit.  CO Requirements [T1] Limit.  Lead Requirements [T1] Limit.  Work Practices related to EAF Baghouse.  Opacity ≤ 30% per 35 IAC 212.123(a).  PM Requirements per 35 IAC 212.322(a) and [T1] Limits.  CO Requirements [T1] Limit.	is for LMF. C	Detailed recordkeeping of periods of operation during malfunction/breakdown with excess emissions.
PM Requirements per 35 IAC 212.322(a) and [T1] Limits.  SO₂ Limits per 35 IAC 214.301 and [T1] Limits.  VOM Requirements [T1] Limit.  CO Requirements [T1] Limit.  CO Requirements [T1] Limit.  Work Practices related to EAF Baghouse.  Opacity ≤ 30% per 35 IAC 212.123(a).  PM Requirements per 35 IAC 212.322(a) and [T1] Limits.  CO Requirements [T1] Limit.	(a). C	Recordkeeping.
SO₂ Limits per 35 IAC 214.301 and [T1] Limits.  VOM Requirements [T1] Limit.  CO Requirements [T1] Limit.  Lead Requirements [T1] Limit.  Work Practices related to EAF Baghouse.  Vork Practices related to EAF Baghouse.  PM Requirements per 35 IAC 212.322(a) and [T1] Limits.  CO Requirements [T1] Limit.  CO Requirements [T1] Limit.	322(a) and [T1] C	Recordkeeping.
VOM Requirements [T1] Limit.  CO Requirements [T1] Limit.  CO Requirements [T1] Limit.  Lead Requirements [T1] Limit.  Work Practices related to EAF Baghouse.  Work Practices related to EAF Baghouse.  Opacity ≤ 30% per 35 IAC 212.123(a).  PM Requirements per 35 IAC 212.322(a) and [T1]  Limits.  CO Requirements [T1] Limit.	[T1] Limits. C	Recordkeeping.
NOx Requirements [T1] Limit.  CO Requirements [T1] Limit.  Lead Requirements [T1] Limit.  Work Practices related to EAF Baghouse.  Opacity ≤ 30% per 35 IAC 212.123(a).  PM Requirements per 35 IAC 212.322(a) and [T1] Limits.  CO Requirements [T1] Limit.	J	Recordkeeping.
CO Requirements [T1] Limit.  Lead Requirements [T1] Limit.  Work Practices related to EAF Baghouse.  Opacity ≤ 30% per 35 IAC 212.123(a).  PM Requirements per 35 IAC 212.322(a) and [T1] Limits.  CO Requirements [T1] Limit.  NOx Requirements [T1] Limit.	3	Recordkeeping.
Lead Requirements [T1] Limit.  Work Practices related to EAF Baghouse.  Opacity ≤ 30% per 35 IAC 212.123(a).  PM Requirements per 35 IAC 212.322(a) and [T1] Limits.  CO Requirements [T1] Limit.  NOx Requirements [T1] Limit.	3 .	Recordkeeping.
Work Practices related to EAF Baghouse.  Opacity ≤ 30% per 35 IAC 212.123(a).  PM Requirements per 35 IAC 212.322(a) and [T1] Limits.  CO Requirements [T1] Limit.  NOx Requirements [T1] Limit.	·	Recordkeeping.
Opacity ≤ 30% per 35 IAC 212.123(a).  PM Requirements per 35 IAC 212.322(a) and [T1] Limits.  CO Requirements [T1] Limit.  NOx Requirements [T1] Limit.	shouse. C	Recordkeeping.
PM Requirements per 35 IAC 212.322(a) and [T1] Limits.  CO Requirements [T1] Limit.  NOx Requirements [T1] Limit.	(a).	Annual Method 9 Opacity observations and Recordkeeping.
CO Requirements [T1] Limit.  NOx Requirements [T1] Limit.  VOM Requirements [T1] Limit.	322(a) and [T1] C	Recordkeeping.
NOx Requirements [T1] Limit. VOM Requirements [T1] Limit.	٥	Recordkeeping.
VOM Requirements [T1] Limit.	o C	Testing within 36 months, Recordkeeping.
	)	Recordkeeping.
4.4.2(f)(i) SO2 Requirements [T1] Limits.	v	Recordkeeping.

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

;			
Source Name		•	Source I.D. Number
ALTON STEEL, INC.	, INC.		119010AAE
(1)	(2)	(3)	(4)
Permit	Description of	Compliance Status	
Condition	Permit Condition	Continuous "C"	Compliance Determination Method
Reference	-	Intermittent "I"	
Number		Noncompliance "N"	, .
4.4.2(g)(i)	Lead Requirements [T1] Limit.	U	Recordkeeping.
4.4.2(h)(i)	Annual Natural Gas Usage ≤ 1,130 mmscf.	U	Recordkeeping.
4.5.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a).	U	Monthly Method 9 Opacity observations, inspections and Recordkeeping.
4.5.2(b)(i)	PM Requirements per 35 IAC 212.322(a).	J	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.	U	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.	U	Work Practices from 35 IAC 212 Subpart K and Recordkeeping.
7.5(a)	CAM Plan for EAF #7.	U	Monitoring and Recordkeeping as specified in CAM Plan Table 7.5.1.

ELINC.  (5)  (6)  (7)  (8)  (8)  (9)  (9)  (9)  (9)  (9)  (9	Source Name					Source	Source I. D. Number	
Description of Period Beacription and Cause of Period Period Period Deviation Description and Cause of Period Deviation Period Deviation Period Deviation Description and Cause of Taken to Remedy Deviation Start Date End Date  CO emision limits 12/9/2019 Islack test cause of high CO readings  Taken to Remedy Deviation Description and Cause of high CO readings cause of high CO readings	N O	STEEL INC.				119010	∿AE	
CO emision limits 12/9/2019 . Ibs/T & Ibs/T exceeded limit during Cause of high CO readings stack test.	(1) on ice	(2) Description of Permit Condition		(4) Deviation Period End Date	•	(6) Corrective Action(s) Taken to Remedy Deviation	(7) Measure(s) Taken to Prevent Future Deviations	<del></del>
	(i)(A	CO emision limits	1	<b>V</b>	lbs/T & lbs/hr exceeded limit during stack test.	Ongoing testing to determine cause of high CO readings		1
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#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

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

In re: CAAPP Permit Annual Compliance Certification

RECEIVED STATE OF ILLINOIS

APR 2 3 2021

ENVIRONMENTAL PROTECTION AGENCY BUREAU OF AIR

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

Matt Dill

Director, Environmental Compliance

cc: IEPA Collinsville Regional Office

IEPA-DIVISION OF RECORDS MANAGEMENT RELEASABLE

MAY 1 4 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

	FOR AGENCY USE ONLY
CAAPP ANNUAL	ID NUMBER:
COMPLIANCE CERTIFICATION	PERMIT #:
	DATE:
	CH CAAPP PERMIT HOLDER SUBMIT AN ANNUAL COMPLIANCE CERTIFICATION FOR AL 5), 39.5 (7) (p) (v) OF THE ENVIRONMENTAL PROTECTION ACT AND CAAPP PERMIT COND

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.

	SOURCE	INFORMATION
1) SOURCE NAME: ALTON STEEL, I		
2) SOURCE ADDRESS: #5 CUT STR	EET	
3) CITY: ALTON		4) COUNTY: MADISON
5) TOWNSHIP:	6) STATE:	7) ZIP CODE: 62002 · 1
8) DATE FORM PREPARED: 04/16/21		9) SOURCE ID NO.: 119010AAE
10) CAAPP PERMIT NO.: 96020056		
11) CALENDAR YEAR OR REPORTING PER	RIOD COVERED BY THIS	REPORT:
2020		
	SOURCE COMPL	IANCE INFORMATION
12) CHECK EITHER (a) OR (b) BELOW:		
(a) During the entire reporti	na period, this source	e was in <b>continuous</b> compliance with ALL terms and

(a) \_\_\_\_\_ During the entire reporting period, this source was in **continuous** 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 **continuous** 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.

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.

ATTACH	MENTS
13) Are you submitting any attachments with this report?	Yes 🛛 No 🗌
If yes, please list the attachments below:	
Table 1, Pages 1-4.	
Table 1, Pages 1-4.	
COMPLIANCE CERTIFICA	
14) In addition to submitting the Compliance Certification rep (CASM), a copy of the Compliance Certification report mappropriate <u>IEPA regional field office</u> . Addresses are list	ust also be submitted to the <u>USEPA Region 5</u> and the
Please check the appropriate boxes.	
A copy of the Compliance Certification report has been subr	nitted to USEPA.
Ye	s □ No ⊠
A copy of the Compliance Certification report has been subr	nitted to the appropriate IEPA regional field office.
Ye	s 🛛 No 🗌
SOURCE CON	TACT PERSON
15) NAME OF TECHNICAL CONTACT PERSON FOR THIS REPORT:	MATT GILL
16) TECHNICAL CONTACT PERSON TITLE:	17) CONTACT PERSON'S TELEPHONE NUMBER:
Director, Environmental Compliance	(618) 374-3570
COMPLIANCE STATEMENT	TAND SIGNATURE DI OCK
COMPLIANCE STATEMENT NOTE: A RESPONSIBLE OFFICIAL MUST SIGN THIS COMPLIANCE CERTIFICAT	ON. UNSIGNED COMPLIANCE CERTIFICATIONS WILL BE RETURNED AS
INCOMPLETE.	
18) I certify under penalty of law that this document and all a	
supervision in accordance with a system designed to as evaluated the information submitted. Based on my inqui	
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	s for submitting false information, including the possibility of
fine and imprisonment for knowing violations.	
AUTHORIZED SIGNATURE:	
BY: James Husarry	President & CEO
	President & CEO  TITLE OF SIGNATORY
James // Waller )	

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

ALTON STEEL, INC.  (1) Permit Condition Reference Number 3.1(a)(i) No fugitive emissions beyond property line per 35 IAC 212.301 and 212.314. 3.1(c) Asbestos Demolition and Renovation. 3.1(d) Future Emission Standards.		1	Source I.D. Number 119010AAE
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t t t tion since er	<i>:</i>	(	
tion		<u>(S</u>	(4)
ince		Compliance Status	
er		Continuous "C"	Compliance Determination Method
٠	lucern	Intermittent "I"	
	Nonce	Noncompliance "N"	
	perty line per 35	U	Recordkeeping
	ements per 40	U	Recordkeeping
	ion.	U	Recordkeeping
		U	Recordkeeping
	equirements per	O	Plan maintained at the source; recordkeeping of activities
3.2(b) PM10 Contingency Measure Plan.		) )	Recordkeeping, should the source become subject to the rule.
3.2(c) Episode Action Plan, 35 IAC 244.		O	Plan maintained at the source and filed with IEPA.
3.2(d) Risk Management Plan, 40 CFR Part 68.	rt 68.	v	Recordkeeping, should the source become subject to the rule.
3.2(e) Scrap Pollution Prevention Plan.		v	Plan maintained at the source and filed with IEPA and recordkeeping.
3.2(f) Site-Specific Plan for Mercury Switches	rches.	U	Plan maintained at the source and filed with IEPA and recordkeeping.
3.5(a) Prompt Reporting.		J	Recordkeeping
3.5(b) Semiannual Reporting.		U	Recordkeeping
3.5(c) Annual Emissions Report.		v	Recordkeeping
3.5(d) Federal Reporting for Scrap Control.	ol.	U	Recordkeeping
4.1.2(a)(i)(A) Opacity <6% per 40 CFR 63.10686(b)(2).	(b)(2).	, )	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.	. [T1] Limit.	, ,	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)	(2)	(3)	(4)
Permit	Description of	Compliance Status	
Condition	Permit Condition	Continuous "C"	Compliance Determination Method
Reference	·	Intermittent "I"	
Number		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.	С	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.	С	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.	l	Monitoring per Condition 4.1.2(e)(ii)(A1), Testing per Condition 4.1.2(e)(ii)(A2)-(B) and Recordkeeping per Condition 4.1.2(e)(ii)(A3).
4.1.2(f)(i)(A)	NOx Requirements (T1) Limit.	С	Monitoring per Condition 4.1.2(f)(ii)(A1), Testing per Condition 4.1.2(f)(ii)(A2)-(B) and Recordkeeping per Condition 4.1.2(f)(ii)(A3).
4.1.2(g)(i)(A)	Lead Requirements (T1) Limit,	С	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.	С	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.	С	Monthly operational inspections and Recordkeeping.
4.1.4(a)-4.1.5	Malfunction/Breakdown provisions for EMS.	С	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).	С	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.	С	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.	С	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.	С	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.	С	Recordkeeping.
4.2.2(g)(i)	Lead Requirements [T1] Limit.	С	Recordkeeping.

Conditions	
Terms and	
_	
Applicable	
Status for	
f Compliance	
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. Listing c	,
Table 1.	

Source Name			Source I.D. Number
ALTON STEEL, INC.	INC.		119010AAE
(1)	(2)	(3)	(4)
Permit	Description of	Compliance Status	
Condition	Permit Condition	Continuous "C"	Compliance Determination Method
Reference		Intermittent "I"	
Number		Noncompliance "N"	
4.2.2(h)(i)	Work Practices related to LMF Baghouse.	U	Recordkeeping.
4.2.4(a)-4.2.5	Malfunction/Breakdown provisions for LMF.	J	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).	U	Recordkeeping.
4.3.2(b)(i)	PM Requirements per 35 IAC 212.322(a) and [T1] Limits.	U	Recordkeeping.
4.3.2(c)(i)	SO <sub>2</sub> Limits per 35 IAC 214.301 and [T1] Limits.	U	Recordkeeping.
4.3.2(d)(i)	VOM Requirements [11] Limit.	U	Recordkeeping.
4.3.2(e)(i)	NOx Requirements [T1] Limit.	U	Recordkeeping.
4.3.2(f)(i)	CO Requirements [T1] Limit.	U	Recordkeeping.
4.3.2(g)(i)	Lead Requirements [T1] Limit.	U	Recordkeeping.
4.3.2(h)(i)	Work Practices related to EAF Baghouse.	v	Recordkeeping.
4.4.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a).	U	Annual Method 9 Opacity observations and Recordkeeping.
4.4.2(b)(i)	PM Requirements per 35 IAC 212.322(a) and [T1] Limits.	J	Recordkeeping.
4.4.2(c)(i)	CO Requirements [T1] Limit.	J	Recordkeeping.
4.4.2(d)(i)	NOx Requirements [T1] Limit.	U	Testing within 36 months, Recordkeeping.
4.4.2(e)(i)	VOM Requirements [T1] Limit.	U	Recordkeeping.
4.4.2(f)(i)	SO2 Requirements [T1] Limits.	U	Recordkeeping.

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Table 1. l	Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions	r Applicable Per	mit Terms and Conditions
Source Name		The second of th	Source I.D. Number
ALTON STEEL, INC.	INC.		119010AAE
(1) Permit	(2)	(E) (3)	(4)
Condition	A	Continuous "C"	Compliance Determination Method
Reference		Intermittent "I"	
Number		Noncompliance "N"	
4.4.2(g)(i)	Lead Requirements [T1] Limit.	U	Recordkeeping.
4.4.2(h)(i)	Annual Natural Gas Usage ≤ 1,130 mmscf.	υ	Recordkeeping.
4.5.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a).	U	Monthly Method 9 Opacity observations, inspections and Recordkeeping.
4.5.2(b)(i)	PM Requirements per 35 IAC 212.322(a).	J	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.	J	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.	J	Work Practices from 35 IAC 212 Subpart K and Recordkeeping.
7.5(a)	CAM Plan for EAF #7.	J	Monitoring and Recordkeeping as specified in CAM Plan Table 7.5.1.

**Deviation Summary Report** 

Table 2.

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

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## **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,

Matt Gill, PE

matt Siy

Director, Environmental Compliance

RECEIVED STATE OF ILLINOIS

APR 2 7 2022

ENVIRONMENTAL PROTECTION AGENCY BUREAU OF AIR

cc: IEPA Collinsville Regional Office

IEPA-DIVISION OF RECORDS MANAGEMENT RELEASABLE

JUN 0 8 2022

REVIEWER: SAB



1) SOURCE NAME:

2) SOURCE ADDRESS:

### 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

# CAAPP ANNUAL COMPLIANCE CERTIFICATION

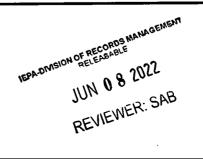
ALTON STEEL, INC.

	FOR'AGENCY, USE, ONLY	
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.

SOURCE INFORMATION

#5 CU	T STREET		
3) CITY: ALTON		4) COUNTY: MADIS	SON
5) TOWNSHIP:	6) STATE:		7) ZIP CODE: 62002
8) DATE FORM PREPARED: 04/22/22		9) SOURCE ID NO. :	119010AAE
10) CAAPP PERMIT NO. 9602			
11) CALENDAR YEAR OR REPORT	ING PERIOD COVERED BY THE	S REPORT:	
2021			
·	SOURCE COMP	LIANCE INFORMATIO	N
12) CHECK EITHER (a) OR (b) BEL	.OW:	<u> </u>	
(a) During the entire conditions contained in its CA the method specified in the pe	APP permit. The method t	e was in <b>continuous</b> cused to determine comp	ompliance with ALL terms and bliance for each term and condition is
(b) With the exception compliance with all terms and term and condition is the met	I conditions contained in the	e permit. The method u	is source was in <b>continuous</b> used to determine compliance for each ated.
NOTE: Table 1 must be con	npleted for all units and a	ctivities regardless of	f compliance status. Table 2 must be



ATTACH	IMENTS
13) Are you submitting any attachments with this report?	Yes ☐ No 🏻
If yes, please list the attachments below:	
COMPLIANCE CERTIFIC	ATION REPORT MAILING
14) In addition to submitting the Compliance Certification rep (CASM), a copy of the Compliance Certification report m appropriate <u>IEPA regional field office</u> . Addresses are list	ust also be submitted to the <u>USEPA Region 5</u> and the
Please check the appropriate boxes.	
A copy of the Compliance Certification report has been sub	mitted to USEPA.
Ye	s □ No ⊠
A copy of the Compliance Certification report has been sub-	nitted to the appropriate IEPA regional field office.
. Y€	es 🛛 No 🗌
	TACT PERSON
15) NAME OF TECHNICAL CONTACT PERSON FOR THIS REPORT:	MATT GILL
16) TECHNICAL CONTACT PERSON TITLE:	17) CONTACT PERSON'S TELEPHONE NUMBER:
Director, Environmental Compliance	(618) 374-3570
COMPLIANCE STATEMEN	T AND SIGNATURE BLOCK
NOTE: A RESPONSIBLE OFFICIAL MUST SIGN THIS COMPLIANCE CERTIFICATION INCOMPLETE.	TION. UNSIGNED COMPLIANCE CERTIFICATIONS WILL BE RETURNED AS
18) I certify under penalty of law that this document and all a supervision in accordance with a system designed to as evaluated the information submitted. Based on my inquestion the information submitted is	sure that qualified personnel properly gathered and
AUTHORIZED SIGNATURE:	
BY: James Husserhy	President & CEO
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
•	
James Hrusovsky	

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

Source Name  (1)  (1)  (2)  (2)  (3)  (4)  (4)  (4)  (A)  (A)  (A)  (A)  (A	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).
Name I STEEL, INC.  (1) (1) (1) (2) (2) (3) (4) (5) (6) (1) (1) (1) (1) (1) (1) (1) (1) (1) (1	Method 9 observations 3 time 4.1.2(a)(ii)(C)-(D).
Name ISTEEL, INC.  (2) (2) (3) (1) (1) (1) (2) (Compliance Status Continuous "C" Intermittent "I" No fugitive emissions beyond property line per 35 (CONTINUOUS "C" Intermittent "I" No fugitive emissions beyond property line per 35 (COR Part 82. (CR Part 83. (CR Part 84. (CR Part 85. (CR Par	Recordkeeping
ISTEEL, INC. (1) (2) (2) (2) Compliance Status Condition Permit Condition  No fugitive emissions beyond property line per 35 IAC 212.301 and 212.314. Ozone depleting substance requirements per 40 CFR Part 82. Asbestos Demolition and Renovation.  Future Emission Standards. C Future Emission Plan, 35 IAC 244. Episode Action Plan, 35 IAC 244.  Episode Action Plan, 40 CFR Part 68. Scrap Pollution Prevention Plan.  Scrap Pollution Prevention Plan. Scrap Pollution Prevention Plan. Scrap Pollution Prevention Plan. Scrap Pollution Prevention Plan. Scrap Pollution Prevention Plan. C Semiannual Reporting. C Semiannual Reporting. C C C C C C C C C C C C C C C C C C C	Recordkeeping
STEEL, INC.   (2)   (3)   Compliance Status	Recordkeeping
STEEL, INC.  (1) (2) (2) (3) (1) (1) (2) (2) (3) (4) (Compliance Status Continuous "C" Intermittent "I" No fugitive emissions beyond property line per 35 IAC 212.301 and 212.314.  Continuous "C" Intermittent "I" Noncompliance "N" Noncompliance "N	Recordkeeping
STEEL, INC.  (1) (2) (2) (3) (1) (1) Description of Compliance Status ition Permit Condition Permit Condition  No fugitive emissions beyond property line per 35 IAC 212.301 and 212.314. Ozone depleting substance requirements per 40 CFR Part 82. Asbestos Demolition and Renovation.  Future Emission Standards.  C Fugitive PM Operating Program requirements per 35 IAC 212. PM10 Contingency Measure Plan.  C Episode Action Plan, 35 IAC 244.  C Risk Management Plan, 40 CFR Part 68.  C Scrap Pollution Prevention Plan.  C C C C C C C C C C C C C C C C C C	Plan maintained at the source
STEEL, INC.  (1) (1) (2) (2) (3) Compliance Status ion nce: Permit Condition No fugitive emissions beyond property line per 35 IAC 212.301 and 212.314. Ozone depleting substance requirements per 40 CFR Part 82. Asbestos Demolition and Renovation. Future Emission Standards. C Fugitive PM Operating Program requirements per 40 PM10 Contingency Measure Plan. C Episode Action Plan, 35 IAC 244. C Risk Management Plan, 40 CFR Part 68. C (3) C (3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N" C C C C C C C C C C C C C C C C C C	Plan maintained at the source
Name  ISTEEL, INC. (1) (2) (2) Compliance Status Description of Description of Continuous "C" Intermittent "I" Noncompliance "N" Continuous "C" Intermittent "I" Noncompliance "N" CFR Part 82. Asbestos Demolition and Renovation.  Fugitive PM Operating Program requirements per 40 Fugitive PM Operating Program requirements per 40 Episode Action Plan, 35 IAC 244.  C3) Episode Action Plan, 35 IAC 244.  C3) COmpliance Status Continuous "C" Intermittent "I" Noncompliance "N" Compliance Status Continuous "C" Intermittent "I" Intermittent "	Recordkeeping, should the sou
ISTEEL, INC.  (1) (2) (2) (3) Compliance Status Continuous "C" Intermittent "I" No fugitive emissions beyond property line per 35 IAC 212.301 and 212.314. Ozone depleting substance requirements per 40 CFR Part 82. Asbestos Demolition and Renovation.  Fugitive PM Operating Program requirements per 40 35 IAC 212.  PM10 Contingency Measure Plan.  C (3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N" C C CFR Part 82. C C CFR Part 82. C C C CFR Part 82. C C C C C C C C C C C C C C C C C C C	Plan maintained at the source
STEEL, INC.  (1) (2) (2) (3) Compliance Status Continuous "C" Intermittent "I" No fugitive emissions beyond property line per 35 IAC 212.301 and 212.314.  Conce depleting substance requirements per 40 CFR Part 82.  Asbestos Demolition and Renovation.  Future Emission Standards.  C Recordkeeping Recordkeeping C Recordkeeping C Recordkeeping C Recordkeeping C Recordkeeping S IAC 212.	Recordkeeping, should the so
Name  I STEEL, INC.  (1)  (2)  (2)  Compliance Status  Continuous "C"  Intermittent "I"  No fugitive emissions beyond property line per 35  IAC 212.301 and 212.314.  Ozone depleting substance requirements per 40  CFR Part 82.  Asbestos Demolition and Renovation.  Future Emission Standards.  (2)  (3)  Compliance Status  Compliance "N"  Noncompliance "N"  Recordkeeping  C Recordkeeping	Plan maintained at the sourc
I STEEL, INC.  (1) (2) (2) Compliance Status Continuous "C" Intermittent "I" No fugitive emissions beyond property line per 35 IAC 212.301 and 212.314. CFR Part 82. Asbestos Demolition and Renovation.  (3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N" Recordkeeping CFR Part 82. C Recordkeeping	Recordkeeping
Name  I STEEL, INC.  (1) (2) (3)  Description of Compliance Status ion Permit Condition Intermittent "I" Noncompliance "N"  No fugitive emissions beyond property line per 35   C Recordkeeping CFR Part 82.	Recordkeeping
(1) (2) (3) (1) Description of tion Permit Condition Continuous "C" Intermittent "I" Noncompliance "N"  No fugitive emissions beyond property line per 35 C Recordkeeping IAC 212.301 and 212.314.	Recordkeeping
Name  STEEL, INC.  (1)  Description of On Permit Condition Intermittent "I" Noncompliance "N"	Recordkeeping
Name  STEEL, INC.  (1)  Description of Compliance Status Continuous "C"  nce Permit Condition Intermittent "I"	
Name  STEEL, INC.  (1)  (2)  Compliance Status  Permit Condition  Continuous "C"	
Name STEEL, INC. (1) (2) (3) Description of Compliance Status	
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Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions

Recordkeeping.	С	Lead Requirements [T1] Limit.	4.2.2(g)(i)
Recordkeeping.	C	CO Requirements [T1] Limit.	4.2.2(f)(i)
Monitoring per Condition 4.2.2(e)(ii)(A) and Recordkeeping per Condition 4.2.2(e)(ii)(B).	C	NOx Requirements [T1] Limit.	4.2.2(e)(i)
Monitoring per Condition 4.2.2(d)(ii)(A) and Recordkeeping per Condition 4.2.2(d)(ii)(B).	C	VOM Requirements [T1] Limit.	4.2.2(d)(i)
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).	C	SO <sub>2</sub> Limits per 35 IAC 214.301 and [T1] Limits.	4.2.2(c)(i)
Recordkeeping.	C	PM Requirements per 35 IAC 212.321(a) and [T1] Limits.	4.2.2(b)(i)
Monthly Method 9 opacity observations, monthly inspections of LMF Baghouse and Recordkeeping.	0	LMF Opacity < 30% per 35 IAC 212.123(a).	4.2.2(a)(i)
Detailed recordkeeping of periods of operation during malfunction/breakdown with excess emissions.	0	Malfunction/Breakdown provisions for EMS.	4.1.4(a)-4.1.5
Monthly operational inspections and Recordkeeping.	C	Work Practices related to emissions control system, Scrap Pollution Prevention Plan and EMS building inspections.	4.1.2(i)(i)(A)
Monitoring per Condition 4.1.2(h)(ii)(A)-(B) and Recordkeeping per Condition 4.1.2(h)(ii)(C).	C	Annual Steel Production ≤ 112 T/hour and 750,000 T/year.	4.1.2(h)(i)(A)
Monitoring per Condition 4.1.2(g)(ii)(A) and Recordkeeping per Condition 4.1.2(g)(ii)(B).	C	Lead Requirements [T1] Limit,	4.1.2(g)(i)(A)
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> ).	C	NOx Requirements [T1] Limit.	4.1.2(f)(i)(A)
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> ).	Z	CO Requirements [T1] Limit.	4.1.2(e)(i)(A)
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).	C	VOM Requirements [T1] Limit.	4.1.2(d)(i)(A)
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).	C	SO2 Limits per 35 IAC 214.301 and [T1] Limits.	4.1.2(c)(i)(A)
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).	C	PM Requirements per 40 CFR 63.10686(b)(1), [T1] Limit and 35 IAC 212.448.	4.1.2(b)(i)(A)-(D)
	Noncompliance "N"		Number
	Intermittent "I"		Reference
Compliance Determination Method	Continuous "C"	Permit Condition	Condition
	<b>Compliance Status</b>	Description of	Permit
(4)	(E)	(2)	(1)
119010AAE	•	INC.	ALTON STEEL, INC.
Source I.D. Number			Source Name

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

Source Name			Source I.D. Number
ALTON STEEL, INC.	NC.		
(1)	(2)	(3)	(4)
Permit	Description of	Compliance Status	
Condition	Permit Condition	Continuous "C"	Compliance Determination Method
Reference		Intermittent "I"	
Number		Noncompliance "N"	
4.2.2(h)(i)	Work Practices related to LMF Baghouse.	С	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).	5	Recordkeeping.
4.3.2(b)(i)	PM Requirements per 35 IAC 212.322(a) and [T1] Limits.	С	Recordkeeping.
4.3.2(c)(i)	SO2 Limits per 35 IAC 214.301 and [T1] Limits.	c	Recordkeeping.
4.3.2(d)(i)	VOM Requirements [T1] Limit.	С	Recordkeeping.
4.3.2(e)(i)	NOx Requirements [T1] Limit.	0	Recordkeeping.
4.3.2(f)(i)	CO Requirements [T1] Limit.	0	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).	5	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)	SO2 Requirements [T1] Limits.	0	Recordkeeping.

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

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Monitoring and Recordkeeping as specified in CAM Plan Table 7.5.1.	, с	CAM Plan for EAF #7.	7.5(a)
Work Practices from 35 IAC 212 Subpart K and Recordkeeping.	C	Work Practices and Control Requirements to reduce Fugitive PM.	4.6.2(b)(i)
Monthly Method 9 Opacity observations, Weekly Method 22 observations at the property line and Recordkeeping.	C	Opacity ≤ 30% per 35 IAC 212.123(a) and no fugitive particulate matter at the property line.	4.6.2(a)(i)
Monthly Inspections and Recordkeeping.	C	PM Requirements per 35 IAC 212.322(a).	4.5.2(b)(i)
Monthly Method 9 Opacity observations, inspections and Recordkeeping.	C	Opacity ≤ 30% per 35 IAC 212.123(a).	4.5.2(a)(i)
Recordkeeping.	5	Annual Natural Gas Usage ≤ 1,130 mmscf.	4.4.2(h)(i)
Recordkeeping.	C	Lead Requirements [T1] Limit.	4.4.2(g)(i)
Compliance Determination Method	Compliance Status Continuous (Ci- Intermittent (II) Noncompliance (N	Description of Permit Condition	Permit Candition Condition Reference
119010AAE			ALTON STEEL, INC.
理论等级。而这些是一致这种企业的理解和研究。Source I.D. Number》(一个一个多种,可以可以是是一种多种的一种,	<b>高温和西北亚</b>	是"是"的"是"。 第二章	Source Name
		0	

Table 2. Deviation Summary Report

Description (2) Period Period Start Date  EAF CO Emissions (1/1/2021)  EAF CO Emissions (1/1/2021)  Description and Cause of Period Start Date  EAF CO Emissions (1/1/2021)  Description and Cause of Deviation Deviation  (CO emissions > limit for lbs/ton and 1/1/2021)  Description and Cause of Deviation Deviation  (CO emissions > limit for lbs/ton and 1/1/2021)  Demnit to increase CO limit for lbs/ton and 1/1/2021  Demnit to increase CO limit for lbs/ton and 1/1/2021  Demnit to increase CO limit for lbs/ton and 1/1/2021  Demnit to increase CO limit for lbs/ton and 1/1/2021  Demnit to increase CO limit for lbs/ton and 1/1/2021  Description and Cause of Deviation Deviation  Taken to Remedy Demonstration of Demnit to increase CO limit for lbs/ton and Cause of Deviation  Taken to Remedy Demonstration of Deviation and Cause of Deviation and Caus	Source Name	ne				So		Source I. D. Number
Description of Period Period Start Date  EAF CO Emissions 1/1/2021 12/31/2021 CO emissions > limit for lbs/ton and pounds/hr on EAF  CO emissions pounds/hr on EAF	ALTON S	TEEL INC.					119010AAE	Æ
EAF CO Emissions   1/1/2021   CO emissions > limit for lbs/ton and pounds/hr on EAF		(2) Description of Permit Condition	(3) Deviation Period Start Date	(4) Deviatior Period End Date	(5) Description and Cause of Deviation	(6) Corrective Action( Taken to Remedy Devi	atio:	
	4.1.2(e)(i)(A	EAF CO Emissions	1/1/2021	†2/31/202 <b>1</b>	CO emissions > limit for lbs/ton and pounds/hr on EAF	Working on appl. for mod. to I permit to increase CO limits	Title	
							-	
	:							
	i							

## ATTACHMENT 7) 2022 ACC.



#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

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

In re: CAAPP Permit Annual Compliance Certification

RECEIVED STATE OF ILLINOIS

APR 2 5 2023

ENVIRONMENTAL PROTECTION AGENCY BUREAU OF AIR

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.

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

IEPA - DIVISION OF RECORDS MANAGEMENT RELEASABLE

Sincerely,

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

	FOR AGENCY USE ONLY.
CAAPP ANNUAL	ID NUMBER:
COMPLIANCE CERTIFICATION	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.

	SOURCE	INFORMATION
1) SOURCE NAME: ALTON STEEL, IN	C.	
2) SOURCE ADDRESS: #5 CUT STRE	ET	
3) CITY: ALTON		4) COUNTY: MADISON
5) TOWNSHIP:	6) STATE:	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 PERIO	OD COVERED BY THIS	REPORT:
2022		
	SOURCE COMPL	IANCE INFORMATION
12) CHECK EITHER (a) OR (b) BELOW:		
		e was in <b>continuous</b> compliance with ALL terms and sed to determine compliance for each term and condition is

(b) \_\_\_\_\_ With the exception of the items identified in Table 1 and Table 2, this source was in continuous 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.

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.

ATTACI	HMENTS
13) Are you submitting any attachments with this report?	Yes ⊠ No □
If yes, please list the attachments below:	
Table 1.	
	CATION REPORT MAILING
14) In addition to submitting the Compliance Certification rep (CASM), a copy of the Compliance Certification report m appropriate <u>IEPA regional field office</u> . Addresses are lis	nust also be submitted to the <u>USEPA Region 5</u> and the
Please check the appropriate boxes.	
A copy of the Compliance Certification report has been sub	mitted to USEPA.
Y€	es 🗌 No 🛛
A copy of the Compliance Certification report has been sub-	mitted to the appropriate IEPA regional field office.
Ye	es ⊠ No 🗌
20/1905 201	TAOT DEDOOM
15) NAME OF TECHNICAL CONTACT PERSON FOR THIS REPORT:	ITACT PERSON
·	MATT GILL
16) TECHNICAL CONTACT PERSON TITLE:	17) CONTACT PERSON'S TELEPHONE NUMBER:
Director, Environmental Compliance	(618) 374-3570
COMPLIANCE STATEMEN	T AND SIGNATURE BLOCK
NOTE: A RESPONSIBLE OFFICIAL MUST SIGN THIS COMPLIANCE CERTIFICATINCOMPLETE.	TION. UNSIGNED COMPLIANCE CERTIFICATIONS WILL BE RETURNED AS
	I I
18) I certify under penalty of law that this document and all a supervision in accordance with a system designed to as evaluated the information submitted. Based on my inquigathering the information, the information submitted is, to complete. I am aware that there are significant penaltie fine and imprisonment for knowing violations.	ssure that qualified personnel properly gathered and
supervision in accordance with a system designed to as evaluated the information submitted. Based on my inquigathering the information, the information submitted is, to complete. I am aware that there are significant penaltie	ssure that qualified personnel properly gathered and uiry of the person or persons directly responsible for to the best of my knowledge and belief, true, accurate, and
supervision in accordance with a system designed to as evaluated the information submitted. Based on my inquigathering the information, the information submitted is, to complete. I am aware that there are significant penalties fine and imprisonment for knowing violations.	ssure that qualified personnel properly gathered and uiry of the person or persons directly responsible for to the best of my knowledge and belief, true, accurate, and
supervision in accordance with a system designed to as evaluated the information submitted. Based on my inquigathering the information, the information submitted is, to complete. I am aware that there are significant penaltie fine and imprisonment for knowing violations.  AUTHORIZED SIGNATURE:	ssure that qualified personnel properly gathered and uiry of the person or persons directly responsible for to the best of my knowledge and belief, true, accurate, and es for submitting false information, including the possibility of
supervision in accordance with a system designed to as evaluated the information submitted. Based on my inquigathering the information, the information submitted is, to complete. I am aware that there are significant penaltie fine and imprisonment for knowing violations.  AUTHORIZED SIGNATURE:  BY:	ssure that qualified personnel properly gathered and uiry of the person or persons directly responsible for to the best of my knowledge and belief, true, accurate, and as for submitting false information, including the possibility of

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

Source Name		• .	Source I.D. Number
ALTON STEEL, INC.	INC.		119010AAE
(1)	(2)	(3)	(4)
Permit	Description of	Compliance Status	
Condition	Permit Condition	Continuous "C"	Compliance Determination Method
Reference		Intermittent "I"	
Number	•	Noncompliance "N"	
3.1(a)(i)	No fugitive emissions beyond property line per 35 IAC 212.301 and 212.314.	С	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.	5	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.	С	Recordkeeping, should the source become subject to the rule.
3.2(c)	Episode Action Plan, 35 IAC 244.	Ċ	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.	5	Plan maintained at the source and filed with IEPA and recordkeeping.
3.2(f)	Site-Specific Plan for Mercury Switches.	0	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.	0	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

Recordkeeping.	C	Lead Requirements [T1] Limit.	4.2.2(g)(i)
Recordkeeping.	C	CO Requirements [T1] Limit.	4.2.2(f)(i)
Monitoring per Condition 4.2.2(e)(ii)(A) and Recordkeeping per Condition 4.2.2(e)(ii)(B).		NOx Requirements [T1] Limit.	4.2.2(e)(i)
Monitoring per Condition 4.2.2(d)(ii)(A) and Recordkeeping per Condition 4.2.2(d)(ii)(B).	С	VOM Requirements [T1] Limit.	4.2.2(d)(i)
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).	С	SO2 Limits per 35 IAC 214.301 and [T1] Limits.	4.2.2(c)(i)
Recordkeeping.	C	PM Requirements per 35 IAC 212.321(a) and [T1] Limits.	4.2.2(b)(i)
Monthly Method 9 opacity observations, monthly inspections of LMF Baghouse and Recordkeeping.	2	LMF Opacity ≤ 30% per 35 IAC 212.123(a).	4.2.2(a)(i)
Detailed recordkeeping of periods of operation during malfunction/breakdown with excess emissions.	C	Malfunction/Breakdown provisions for EMS.	4.1.4(a)-4.1.5
Monthly operational inspections and Recordkeeping.	C	Work Practices related to emissions control system, Scrap Pollution Prevention Plan and EMS building inspections.	4.1.2(i)(i)(A)
Monitoring per Condition 4.1.2(h)(ii)(A)-(B) and Recordkeeping per Condition 4.1.2(h)(ii)(C).	C	Annual Steel Production ≤ 112 T/hour and 750,000 T/year.	4.1.2(h)(i)(A)
Monitoring per Condition 4.1.2(g)(ii)(A) and Recordkeeping per Condition 4.1.2(g)(ii)(B).	5	Lead Requirements [T1] Limit,	4.1.2(g)(i)(A)
Monitoring per Condition 4.1.2(f)(ii)(A1), Testing per Condition 4.1.2(f)(ii)(A2)-(B) and Recordkeeping per Condition 4.1.2(f)(ii)(A3).	5	NOx Requirements [T1] Limit.	4.1.2(f)(i)(A)
Monitoring per Condition 4.1.2(e)(ii)(A1), Testing per Condition 4.1.2(e)(ii)(A2)-(B) and Recordkeeping per Condition 4.1.2(e)(ii)(A3).	N.	CO Requirements [T1] Limit.	4.1.2(e)(i)(A)
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).	C	VOM Requirements [T1] Limit.	4.1.2(d)(i)(A)
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).	C	SO2 Limits per 35 IAC 214.301 and [T1] Limits.	4.1.2(c)(i)(A)
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).		PM Requirements per 40 CFR 63.10686(b)(1), [T1] Limit and 35 IAC 212.448.	4.1.2(b)(i)(A)-(D)
	Noncompliance "N"		Number
	Intermittent "!"		Reference
Compliance Determination Method	Continuous "C"	Permit Condition	Condition
	Compliance Status	Description of	Permit
(4)	(3)	(2)	(1)
119010AAE		INC.	
Source I.D. Number			Source Name

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

ומטוכ ד. בי	ביזרווים מי במווליומיוכב זימימז יי	or Applicanic . c.	
Source Name	-		Source I.D. Number
ALTON STEEL, INC.	NC.		119010AAE
(t)	(2)	(3)	(4)
Permit	Description of	Compliance Status	
Condition	Permit Condition	Continuous "C"	Compliance Determination Method
Reference		Intermittent "I"	
Number		Noncompliance "N"	
4.2.2(h)(i)	Work Practices related to LMF Baghouse.	С	Recordkeeping.
4.2.4(a)-4.2.5	Malfunction/Breakdown provisions for LMF.	С	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).	С	Recordkeeping.
4.3.2(b)(i)	PM Requirements per 35 IAC 212.322(a) and [T1] Limits.	С	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)	SO2 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.	INC.		119010AAE
(1)	(2)	(3)	(4)
Permit	Description of	Compliance Status	
Condition	Permit Condition	Continuous "C"	Compliance Determination Method
Reference		Intermittent "I"	
Number		Noncompliance "N"	
4.4.2(g)(i)	Lead Requirements [T1] Limit.	С	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.	С	Monitoring and Recordkeeping as specified in CAM Plan Table 7.5.1.

Table 2. Deviation Summary Report

Source Name				Source	Source I. D. Number
ALTON STEEL INC.				1190	
(1) (2) Permit Description of Condition Permit Condition Reference	(3) Deviation Period Start Date	(4) Deviatior 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	1/1/22	12/31/22	CO emissions >2.0 lbs/ton		
4.1.2(b)(i)(D	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)
				,	

Printed on Recycled Paper 401-CAAPP

•: , • .

# 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

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

In re: CAAPP Permit Annual Compliance Certification

RECEIVED STATE OF ILLINOIS

APR 3 0 2024

ENVIRONMENTAL PROTECTION AGENCY
BUREAU OF AIR

### 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

Matt Sil

Director, Environmental Compliance

IEPA
Division of Records Management
Releasable

JUN 1 2 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

			FO	R AGENCY USE ONLY
		ID	NUMBER:	
CAAPP ANNU			·	
COMPLIANCE CERTI	FICATION	PE	RMIT #:	
		DA	TE:	
MISSION UNITS AT THE SOURCE AS REQUIRE	ED BY 40 CFR 70.6 (c) (5). TING PERIOD IS JANUAR	, 39.5 (7) RY 1 TO (	(p) (v) OF THE ENVIRONME DECEMBER 31 AND IS DUE	AN ANNUAL COMPLIANCE CERTIFICATION FOR ALL INTAL PROTECTION ACT AND CAAPP PERMIT COND ON OR BEFORE MAY 1 FOR THE PRECEDING CALEN
	SOUR	CE IN	FORMATION	
) SOURCE NAME: ALTON STEEL,	INC.			
2) SOURCE ADDRESS: #5 CUT STI	REET			
B) CITY: ALTON			4) COUNTY: MADIS	ON
) TOWNSHIP:	6) STATE:	-		7) ZIP CODE: 62002
) DATE FORM PREPARED:			9) SOURCE ID NO. :	119010AAE
04/18/24		<del></del>		
0) CAAPP PERMIT NO.: 96020056				
1) CALENDAR YEAR OR REPORTING PE	RIOD COVERED BY	THIS RE	EPORT:	
2023				
	<del></del>			
	SOURCE COM	MPLIA.	NCE INFORMATION	l .
2) CHECK EITHER (a) OR (b) BELOW:				
				empliance with ALL terms and iiance for each term and condition is
b) With the exception of tompliance with all terms and conderm and condition is the method sp	litions contained in	the pe	ermit. The method us	s source was in <b>continuous</b> sed to determine compliance for each ted.
NOTE: Table 1 must be complete				compliance status. Table 2 must be

ATTAC	HMENTS
13) Are you submitting any attachments with this report?	Yes 🛛 No 🗌
If yes, please list the attachments below:	•
Table 1.	
•	
	ATION REPORT MAILING
14) In addition to submitting the Compliance Certification rep (CASM), a copy of the Compliance Certification report m appropriate <u>IEPA regional field office</u> . Addresses are list	ust also be submitted to the USEPA Region 5 and the
Please check the appropriate boxes.	
A copy of the Compliance Certification report has been subr	mitted to USEPA.
Ye	s □ No ⊠
A copy of the Compliance Certification report has been subr	mitted to the appropriate IEPA regional field office.
Ye	s 🖾 No 🗀
SOURCE CON	TACT PERSON
15) NAME OF TECHNICAL CONTACT PERSON FOR THIS REPORT:	MATT GILL
16) TECHNICAL CONTACT PERSON TITLE:	17) CONTACT PERSON'S TELEPHONE NUMBER:
Director, Environmental Compliance	(618) 374-3570
	T AND SIGNATURE BLOCK
NOTE: A RESPONSIBLE OFFICIAL MUST SIGN THIS COMPLIANCE CERTIFICAT INCOMPLETE.	ION. UNSIGNED COMPLIANCE CERTIFICATIONS WILL BE RETURNED AS
	sure that qualified personnel properly gathered and
AUTHORIZED SIGNATURE:	
BY: 05	President & CEO
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
Chris Ervin	<u> </u>
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Printed on Recycled Paper 401-CAAPP

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

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

Course Mano	ביינייו פי כי כי בייניין פייני איניין פייניין פייניין פייניין פייניין פייניין פייניין פייניין פייניין פייניין	א אוורמאוע ו	Applicable relinit terms and conditions
Source Marine			Source I.D. Number
ALTON STEEL, INC.	INC.		119010AAE
(1)	(2)	(3)	(4)
Permit	Description of	Compliance Status	
Condition	Permit Condition	Continuous "C"	Compliance Determination Method
Reference	•	Intermittent "I"	
Number		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.	U	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.	U	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.	J	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)(A1), Testing per Condition 4.1.2(e)(ii)(A2)-(B) and Recordkeeping per Condition 4.1.2(e)(ii)(A3).
4.1.2(f)(i)(A)	NOx Requirements [T1] Limit.	U	Monitoring per Condition 4.1.2(f)(ii)(A1), Testing per Condition 4.1.2(f)(ii)(A2)-(B) and Recordkeeping per Condition 4.1.2(f)(ii)(A3).
4.1.2(g)(i)(A)	Lead Requirements [T1] Limit,	J	Monitoring per Condition 4.1.2(g)(ii)(A) and Recordkeeping per Condition 4.1.2(g)(ii)(B).
,	Annual Steel Production < 112 T/hour and 750,000 T/year.	U	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.	U	Monthly operational inspections and Recordkeeping.
4.1.4(a)-4.1.5	Malfunction/Breakdown provisions for EMS.	U	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).	U	Monthly Method 9 opacity observations, monthly inspections of LMF Baghouse and Recordkeeping.
	PM Requirements per 35 IAC 212.321(a) and [T1] Limits.	U	Recordkeeping.
4.2.2(c)(i)	502 Limits per 35 IAC 214.301 and [T1] Limits.	U	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.	J	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.	U	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.	v	Recordkeeping.
4.2.2(g)(i)	Lead Requirements [T1] Limit.	Ü	Record keeping.

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

Course Mamo	0		Country of Minehal
שמת בב ואמוווב			Source 1.D. Number
ALTON STEEL, INC.	INC.		119010AAE
(1)	(2)	(3)	(4)
Permit	Description of	Compliance Status	
Condition	Permit Condition	Continuous "C"	Compliance Determination Method
Reference		Intermittent "I"	
Number		Noncompliance "N"	
4.2.2(h)(i)	Work Practices related to LMF Baghouse.	J	Recordkeeping.
4.2.4(a)-4.2.5	Malfunction/Breakdown provisions for LMF.	U	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).	U	Recordkeeping.
4.3.2(b)(i)	PM Requirements per 35 IAC 212.322(a) and [T1] Limits.	v	Recordkeeping.
4.3.2(c)(i)	502 Limits per 35 IAC 214.301 and [T1] Limits.	J	Recordkeeping.
4.3.2(d)(i)	VOM Requirements [71] Limit.	J	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.	J	Recordkeeping.
4.3.2(h)(i)	Work Practices related to EAF Baghouse.	J	Recordkeeping.
4.4.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a).	J	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.	o .	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)	SO2 Requirements [T1] Limits.	υ	Recordkeeping.

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

<b>Source Name</b>			Source I.D. Number
ALTON STEEL, INC.	INC.		119010AAE
. (1) Permit	(2) Description of	(3) : Compliance Status	(b)
Condition	Permit Condition	Continuous "C"	Compliance Determination Method
Reference Number		Intermittent "I" Noncompliance "N"	
4.4.2(g)(i)	Lead Requirements [T1] Limit.	C	Recordkeeping.
4.4.2(h)(i)	Annual Natural Gas Usage ≤ 1,130 mmscf.	J	Recordkeeping.
4.5.2(a)(i)	Opacity ≤ 30% per 35 IAC 212.123(a).	U	Monthly Method 9 Opacity observations, inspections and Recordkeeping.
4.5.2(b)(i)	PM Requirements per 35 IAC 212.322(a).	J	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.	3	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 Na	me.		A MARKET		NATEMBER 1	Source	L.D. Number	
ALTON STEEL INC.							119010AAE	
Permit Condition Reference	(2) Description of Permit Condition	(3) Deviation Period Start Date	(4) Deviation Period = End Date	(5) (5) (5) (5) (5) (6) (6) (6) (6) (6) (6) (6) (6) (6) (6	(6) Corrective Act Taken to Remedy	ion(s) Deviation	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	
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							•	
	•		·					
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							·	