State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

(217)782-5544

US EPA RECORDS CENTER REGION 5
1000327

March 4, 1993

RECEIVED
LEGAL DEPARTMENT
MAR 08 1993

Mr. Ralph P. End, Vice President
General Counsel
Keystone Consolidated Industries, Inc.
Three Lincoln Centre
5430 Freeway, Suite 1440
Dallas, Texas 75240

Re: #K061-Electric Arc Furnace
Emission Control Dust Radioactively
Contaminated with Cesium 137
LPC#1430050001 - Peoria County
ILD 00714881

Dear Mr. End:

I am writing to you concerning our recent telephone conversation of March 2, 1993. At the present time your waste has been determined by the Illinois Department of Nuclear Safety to be radioactive. Therefore, Keystone does not need to apply for a RCRA provisional variance as defined in 35 Ill. Adm. Code §722.134.

If at some point in time you need to apply for a provisional variance, please contact me at 217/782-5544.

Thank you for your cooperation in this matter.

Sincerely,

Donna R. Grant

DONNA R. GRANT
Legal Investigator
Division of Legal Counsel

DRG:slm

PENGAD-Bayonne, N. J.
EXHIBIT
A

Annual Report Waste Codes For Waste Petroleum Naphtha (Alleged Violation No. 12)

Keystone used the most applicable waste code for its Waste Petroleum Naphtha (D001) in its 1995 Hazardous Waste Report. Contrary to IEPA's January 8, 1997 Notice, IEPA's annual report form does not contain a question for "Additional Description for Materials Listed Above" corresponding to the box with that description on the hazardous waste manifest form. While Keystone questions the purpose of listing redundant or secondary waste codes on the annual report, it will make the requested amendment. For the reasons set forth above, Keystone does not agree that any amendment should be made to list excavated soil from the June 5, 1995 acid spill as K062 listed hazardous waste.

While we believe the foregoing addresses all of the alleged violations in your Notice, we will be prepared to discuss any other matters relating to the July 30, 1996 RCRA inspection at the forthcoming meeting. Please call me to schedule that meeting (309-697-7527).

Sincerely,

Bob Miller

R. N. Miller, P.E.
General Manager
Product & Process Improvement

Enclosures

Cc: Ralph P. End, Esq.
Andrew R. Running, Esq.

ACID RECOVERY CYCLE

Date	Batch Start Time	Batch Temp	High Iron %Acid	High Iron %Iron	Crystal Temp	Centrifuge Set Point	Operator Intitials	Cycle Finish Time	Low Iron %Acid	Low Iron %Iron	Anti-Foam and/or Acid	Remarks
2nd (5) 5-31	5:00 A	138	8.0 / 8.8	7.2 / 7.9	79	70 8:35 A	4F LW	12:15 P			42°	15 min hold
1st (6) 6-1	1:20 P	147	8.5 / 9.3	7.9 / 8.7	89	70 5:25	LW DS	9:30			36	Hold off
3rd (7) 6-1	4:40 A	139	8.0 / 8.8	7.6 / 8.4	84	70 8:25 A	4F LW	12:20 P			44°	OK
1st (8) 6-2	1:45 P	148	8.0 / 8.8	8.0 / 8.8	89	70 5:00	LW [illegible]	9:30 P			41°	OK
3rd (1) 6-4	4:00 A	130	8.0 / 8.8	8.1 / 8.9	89	70 8:00 A	4F LW	6:30 P	Shut Down Acid Left		45°	Restart at 300 pm
2nd (2) 6-5	7:00 Pm	132	8.1 / 8.7	8.0 / 8.8	89	70 12:30 A	[illegible] 4F	4:15 A			40	15 min OK
3rd (3) 6-5	5:15 A	100	7.8 / 8.6	6.0 / 6.6	85	60 7:00 A	4F LW	10:15 P			40	15 min hold ok
1st (4) 6-6	10:55	150	7.8 / 8.6	8.0 / 8.8	87	70 3:45	LW	7:45			40°	OK
2nd (5) 6-6	8:15	140	8.0 / 8.8	7.9 / 8.7	87	70 12:40 A	[illegible] 4F	4:20 A			38	15 min OK
3rd (6) 6-6	4:50 A	140	8.4 / 9.2	8.0 / 8.8	89	70 8:50	4F TJ	12:30 P	4:00 / 3:40 / 7:40		51°	Stopped at 34°
2nd (7) 6-7	7:45 A	149	7.8 / 8.6	8.8 / 9.6	98	70 12:20 A	LW 4F	4:50 A	4:35 / 4:30 / 9:05		39	15 min OK

? WHY B

NOTE: Acid & Iron Reading to be multiplied by 1.1
Cycle finish time does not include 1/2 hour for acid transfer

ENGAD-Bayonne, N. J.
EXHIBIT
B

EXHIBIT 1

EXHIBIT C

PENGAD-Bayonne, N. J.

WASTE ACCUMULATION AREA
WEEKLY INSPECTION LOG

Waste Accumulation Area No. 1: Building 42

Waste Types Present: Oak – 5	Number of Drums
Paint & Thinner – wm Paint Shop	4
Paint	6
Mineral Spirits – wm Draw	2
PCB	5

Drum Conditions	Good	Defects	Defective Drums No./Comments
Aisle Space (4 ft)	✓		
Bulges	✓		
Dents		✓	Punctured PCB Drum, no leaks
Bungs Tight	✓		
Rust	✓		
Pallet Condition	✓		
Completed Labels (Legible)	✓		
Warning Signs	✓		
Security	✓		
Spills or Leaks	✓		

(Make additional copies for additional sources)

Comments: _____

Inspector Signature: John R. Shelley Date: 7-31-96 Time: 0946 hrs

EXHIBIT 1

WASTE ACCUMULATION AREA
WEEKLY INSPECTION LOG

Waste Accumulation Area No. 1: Building 42 WATER & OIL	
Waste Types Present:	**Number of Drums**
Paint & Thinner - WM Paint Shop	4
Paint Galv	2
Mineral Spirits + Coconut Oil - WM Draw D. Miller	2
PCB	3

Drum Conditions	Good	Defects	Defective Drums No./Comments
Aisle Space (4 ft)	✓		
Bulges	✓		
Dents		✓	Punctured PCB Drum no leaks
Bungs Tight	✓		
Rust	✓		
Pallet Condition	✓		
Completed Labels (Legible)	✓		
Warning Signs	✓		
Security	✓		
Spills or Leaks	✓		

(Make additional copies for additional sources)

Comments: NEED MOVE PCB TO STORAGE BLDG, PUT ZNO GALV PAINT DRUM IN W/ OTHERS IN HW AREA NOT BY SPILL KIT

Inspector Signature: John R. Shelley Date: 7-22-96 Time: 1256 hrs

EXHIBIT 1

WASTE ACCUMULATION AREA
WEEKLY INSPECTION LOG

Water Soap - 2
Oil/Water Mix 6

Waste Accumulation Area No. 1: Building 42 PCB - 3	
Waste Types Present:	**Number of Drums**
Paint	5
Contaminated Oil	1
340 Solvent	3
Lubricant?	1

Drum Conditions	Good	Defects	Defective Drums No./Comments
Aisle Space (4 ft)	✓		
Bulges	✓		
Dents		✓	1- Punctured PCB drum near top
Bungs Tight	✓		
Rust	✓		
Pallet Condition	✓		
Completed Labels (Legible)	✓		
Warning Signs	✓		
Security	✓		
Spills or Leaks	✓		

(Make additional copies for additional sources)

Comments: _____

Inspector Signature: [signature] Date: 7-15-96 Time: 14:24hrs

EXHIBIT 1

WASTE ACCUMULATION AREA
WEEKLY INSPECTION LOG

Waste Accumulation Area No. 1: Building 42 PCB's - 3	
Waste Types Present:	**Number of Drums**
Paint	4
340 Solvent	2
Lube Cleaner	2
Lubricant	1

Drum Conditions	Good	Defects	Defective Drums No./Comments
Aisle Space (4 ft)	✓		
Bulges	✓		
Dents		✓	one PCB drum was punctured by forklift, no spill or leaks
Bungs Tight	✓		
Rust	✓		
Pallet Condition	✓		
Completed Labels (Legible)	✓		
Warning Signs	✓		
Security	✓		
Spills or Leaks	✓		

(Make additional copies for additional sources)

Comments: _____

Inspector Signature: John R. Shelly Date: 7-11-96 Time: 1111 hrs

EXHIBIT 1

WASTE ACCUMULATION AREA
WEEKLY INSPECTION LOG

Waste Accumulation Area No. 1: Building 42 PCB			3
Waste Types Present:			Number of Drums
Paint			4
340 Solvent			2
Lube Cleaner			2
Lubricant			1
Drum Conditions	Good	Defects	Defective Drums No./Comments
Aisle Space (4 ft)	✓		
Bulges	✓		
Dents		✓	one PCB drum was punctured by forklift near top of drum
Bungs Tight	✓		
Rust	✓		
Pallet Condition	✓		
Completed Labels (Legible)	✓		
Warning Signs	✓		
Security	✓		
Spills or Leaks	✓		

(Make additional copies for additional sources)

Comments: _____

Inspector Signature: [signature] Date: 7-1-96 Time: 0956 hrs

EXHIBIT 1

WASTE ACCUMULATION AREA
WEEKLY INSPECTION LOG

Waste Accumulation Area No. 1: Building 42 PCB	3
Waste Types Present:	**Number of Drums**
Paint	4
340 Solvent	2
Lube Cleaner	2
Lubricant	1

Drum Conditions	Good	Defects	Defective Drums No./Comments
Aisle Space (4 ft)	✓		
Bulges	✓		
Dents		✓	One PCB Drum punctured by forklift near top
Bungs Tight	✓		
Rust	✓		
Pallet Condition	✓		
Completed Labels (Legible)	✓		
Warning Signs	✓		
Security	✓		
Spills or Leaks	✓		

(Make additional copies for additional sources)

Comments: _____

Inspector Signature: John R. Shelley Date: 6-24-96 Time: JRS 1131 hrs

EXHIBIT 1

WASTE ACCUMULATION AREA
WEEKLY INSPECTION LOG

Waste Accumulation Area No. 1: Building 42			
Waste Types Present:			Number of Drums
Paint			4
Lubricant			1
Lube Cleaner			2
PCB			3
Drum Conditions	Good	Defects	Defective Drums No./Comments
Aisle Space (4 ft)	✓		
Bulges	✓		
Dents		✓	one PCB drum is punctured no leaks
Bungs Tight	✓		
Rust	✓		
Pallet Condition	✓		
Completed Labels (Legible)	✓		
Warning Signs	✓		
Security	✓		
Spills or Leaks	✓		

(Make additional copies for additional sources)

Comments: _____

Inspector Signature: John R. Shelley Date: 6-19-96 Time: 0808 hrs

EXHIBIT 1

WASTE ACCUMULATION AREA
WEEKLY INSPECTION LOG

Waste Accumulation Area No. 1: Building 42			
Waste Types Present:			Number of Drums
Paint			4
Lubricant			1
Lube Cleaner			2
PCB			3
Drum Conditions	Good	Defects	Defective Drums No./Comments
Aisle Space (4 ft)	✓		
Bulges	✓		
Dents	✓		
Bungs Tight	✓		
Rust	✓		
Pallet Condition	✓		
Completed Labels (Legible)	✓		
Warning Signs	✓		
Security	✓		
Spills or Leaks	✓		

(Make additional copies for additional sources)

Comments: _____

Inspector Signature: R. Shelley Date: 6-10-96 Time: 0753hrs

EXHIBIT 1

WASTE ACCUMULATION AREA
WEEKLY INSPECTION LOG

Waste Accumulation Area No. 1: Building 42			
Waste Types Present:			Number of Drums
Paint			2
Dober Chem. Lub. 2298 61-83-001			1
Lube Cleaner			2
PCB			3
Drum Conditions	Good	Defects	Defective Drums No./Comments
Aisle Space (4 ft)	✓		
Bulges	✓		
Dents	✓		
Bungs Tight	✓		
Rust	✓		
Pallet Condition	✓		
Completed Labels (Legible)	✓		
Warning Signs	✓		
Security	✓		
Spills or Leaks	✓		

(Make additional copies for additional sources)

Comments: _____

Inspector Signature: John R. Shelley Date: 6-7-96 Time: 1148hrs

EXHIBIT 1

WASTE ACCUMULATION AREA
WEEKLY INSPECTION LOG

Waste Accumulation Area No. 1: Building 42	
Waste Types Present:	Number of Drums
Paint	2
Ober Chemical Lubricant 2298 61-63001	1
Lube Cleaner	2
PCB	3

Drum Conditions	Good	Defects	Defective Drums No./Comments
Aisle Space (4 ft)	✓		
Bulges	✓		
Dents	✓		
Bungs Tight	✓		
Rust	✓		
Pallet Condition	✓		
Completed Labels (Legible)	✓		
Warning Signs	✓		
Security	✓		
Spills or Leaks	✓		

(Make additional copies for additional sources)

Comments: _____

Inspector Signature: John R. Shelley Date: 5-28-96 Time: ~~FB~~ JRS 1245 hrs

EXHIBIT 1

WASTE ACCUMULATION AREA
WEEKLY INSPECTION LOG

Waste Accumulation Area No. 1: Building 42	
Waste Types Present:	**Number of Drums**
Paint	~~Paint~~ 2
Oober Lub ?	1
Lube Cleaner	2
PCB Stuff - Cleanup	3

Drum Conditions	Good	Defects	Defective Drums No./Comments
Aisle Space (4 ft)	✓		
Bulges	✓		
Dents	✓		
Bungs Tight	✓		
Rust	✓		
Pallet Condition	✓		
Completed Labels (Legible)	✓		
Warning Signs	✓		
Security	✓		
Spills or Leaks	✓		

(Make additional copies for additional sources)

Comments: _____

Inspector Signature: John R. Shelley Date: 3RS 95-20-96 Time: 1042hrs

EXHIBIT 1

WASTE ACCUMULATION AREA
WEEKLY INSPECTION LOG

Waste Accumulation Area No. 1: Building 42	
Waste Types Present:	**Number of Drums**
Paint	3

Drum Conditions	Good	Defects	Defective Drums No./Comments
Aisle Space (4 ft)	✓		
Bulges	✓		
Dents	✓		
Bungs Tight	✓		
Rust	✓		
Pallet Condition	✓		
Completed Labels (Legible)	✓		
Warning Signs	✓		
Security	✓		
Spills or Leaks	✓		

(Make additional copies for additional sources)

Comments: _____

Inspector Signature: John R. Shelley Date: 5-13-96 Time: 1340 hrs

EXHIBIT 1

WASTE ACCUMULATION AREA
WEEKLY INSPECTION LOG

Waste Accumulation Area No. 1: Building 42	
Waste Types Present:	**Number of Drums**
Paint	3

Drum Conditions	Good	Defects	Defective Drums No./Comments
Aisle Space (4 ft)	✓		
Bulges	✓		
Dents	✓		
Bungs Tight	✓		
Rust	✓		
Pallet Condition	✓		
Completed Labels (Legible)	✓		
Warning Signs	✓		
Security	✓		
Spills or Leaks	✓		

(Make additional copies for additional sources)

Comments: _____

Inspector Signature: Jim R. Shelley Date: 5-6-96 Time: 1520 hrs

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT
P.O. Box 7035
Indianapolis, IN 46207-7035

PLEASE PRINT OR TYPE (Form designed for use on elite (12-pitch typewriter.) Form approved. OMB No. 2050-0039. Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No. ILD000714881 | Manifest Document No. | 2. Page 1 of | Information in the shaded areas is not required by Federal law, but Items D, F, H, I and K are required by State law.

3. Generator's Name and Mailing Address
KEYSTONE STEEL & WIRE % JACK SKELLEY
7000 S. W. ADAMS
PEORIA, IL. 61641
4. Generator's Phone (309) 697-7020

A. State Manifest Document Number INA 1059126
B. State Generator's ID 143005000 1

5. Transporter 1 Company Name: POLY-GENERICS CO. | 6. US EPA ID Number: ILD981758101
C. State Transporter's ID IL-2272
D. Transporter's Phone 304-614-8581

7. Transporter 2 Company Name | 8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
POLLUTION CONTROL INDUSTRIES
4343 KENNEDY AVE
E. CHICAGO, IND. 46312
10. US EPA ID Number: IND000646943
G. State Facility's ID
H. Facility's Phone 219-397-3951

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol.	I. Waste No.
a HAZARDOUS WASTE LIQUID (NOS) (CHLOROBENZENE) 9, NA3082 PG III	003	DM	1656	G	D036
b WASTE PETROLEUM NAPTHA 3, UN1255, PG II	005	DM	275	G	D001
c					
d					

J. Additional Descriptions for Materials Listed Above | K. Handling Codes for Wastes Listed Above
501

15. Special Handling Instructions and Additional Information
1(a) 120245 4959 INVOICE POLY-GENERICS 7/19/96
1(B) 120247 49946 C: 507746 B: 507740

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.
A) 1024 #2 B) 1707 #2

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: John R. Skelley for KSTW | Signature: John R. Skelley | Date Month Day Year: 07 18 96

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: THOMAS RINKACH | Signature: T. Rinkach | Date Month Day Year: 07 18 96

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Date Month Day Year

FACILITY

19. Discrepancy Indication Space
DATE CORRECTED 7-18-96 JRS

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted item 19.
Printed/Typed Name: LINDA L. MAYDEN | Signature: Linda L. Mayden | Date Month Day Year: 07 18 96

INA 1059126

EPA Form 8700-22
Previous editions are obsolete

In ... of a spill call the Indiana Office of Environmental Response at ... 241-4336 (day or night) and the National Response Center at 800/424-8802 or 202/426-2675.

EXHIBIT 1

WASTE ACCUMULATION AREA
WEEKLY INSPECTION LOG

Waste Accumulation Area No. 1: Building 42	
Waste Types Present:	**Number of Drums**
KSW 50	2
Lube Cleaner ? (Dan Miller ?)	2
Water + Oil ?	6

Drum Conditions	Good	Defects	Defective Drums No./Comments
Aisle Space (4 ft)	✓		
Bulges	✓		
Dents	✓		
Bungs Tight	✓		
Rust	✓		
Pallet Condition	✓		
Completed Labels (Legible)	✓		
Warning Signs	✓		
Security	✓		
Spills or Leaks	✓		

(Make additional copies for additional sources)

Comments: _____

Inspector Signature: [signature] Date: 4-29-96 Time: 1514

OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT
P.O. Box 7035
Indianapolis, IN 46207-7035

PLEASE PRINT OR TYPE (Form designed for use on elite (12-pitch typewriter.) Form approved. OMB No. 2050-0039. Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No.
Manifest Document No.
2. Page 1 of
Information in the shaded areas is not required by Federal law, but items D, F, H, I and K are required by State law.

3. Generator's Name and Mailing Address
4. Generator's Phone ( )

A. State Manifest Document Number: INA 1059126
B. State Generator's ID

5. Transporter 1 Company Name
6. US EPA ID Number
C. State Transporter's ID
D. Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
10. US EPA ID Number
G. State Facility's ID
H. Facility's Phone

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol.	I. Waste No.
a CATEX	3				
b PETROLEUM NAPTHA	5		21		
c					
d					

J. Additional Descriptions for Materials Listed Above
K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name | Signature | Date Month 07 Day 18 Year 96

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Date Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted item 19.
Printed/Typed Name | Signature | Date Month Day Year

GENERATOR
TRANSPORTER
FACILITY

EPA Form 8700-22
Previous editions are obsolete
State Form 11865 (R2 / 1-94)

...se of a spill call the Indiana Office of Environmental Response at ...241-4336 (day or night) and the ...nal Response Center at 800/424-8802 or 202/426-2675.

INA 1059126

P.03
1 219 397 6264
FCI
04:10PM
01-06-1995

FORM 1

Generator Name/Location KEYSTONE STEEL. PEORIA, IL.

EPA ID Number ILD007414881 Manifest Number JNA 1059126

Waste Analysis Available _____ Yes _____ No X On file at facility Date 7/18/86

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA.	RCRA WASTE CODES (List all that apply)	SUBCATEGORY	TREATABILITY GROUP Please check the applicable treatability group.		CALIFORNIA LIST WASTES	REGULATED CONSTITUENTS D001*, D002, D012- F001-F005 & F0
				Nonwastewater >1% TOC & >1% TSS	Wastewater	List all applicable constituents from key below	List all applicable con from Table I and/o below
a	b	c	d	e	f	g	h
120245		D036		X		—	23
120247		D001		X		—	—

CALIFORNIA LIST WASTES (for Column g)

1) PCB ≥ 50 ppm 2) Halogenated Organic Carbon (HOC's) ≥ 1000mg/l 3) Nickel (Ni) ≥ 134mg/l 4) Thallium (Tl) ≥ 130mg/l

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005 (for Column h)

5) Acetone
6) Benzene
7) N-Butyl Alcohol
8) Carbon Disulfide
9) Carbon Tetrachloride
10) Chlorobenzene
11) Cresols (o, m, or p isomers)
12) Cresylic Acid
13) Cyclohexanone
14) 1,2-Dichlorobenzene
15) Ethyl Acetate
16) Ethyl Benzene
17) Ethyl Ether
18) Isobutanol (Isobutyl alcohol)
19) Methanol
20) Methylene Chloride
21) Methyl Ethyl Ketone
22) Methyl Isobutyl Ketone
23) Nitrobenzene
24) Pyridine
25) Tetrachloroethylene
26) Toluene
27) 1,1,1 Trichloroethane
28) 1,1,2 Trichloroethane
29) 1,1,2 Trichloro 1,2,2, Trifl
30) Trichloroethylene
31) Trichlorofluoromethane
32) Xylene (Total)

I certify under penalty of law that the above information is accurate and true.

Signature L. SICKELLEY Print Name _____

P.O. BOX 19276 SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6761

State Form LPC 62 8/81 532-06

FOR SHIPMENT OF HAZARDOUS AND SPECIAL WASTE

PLEASE TYPE (Form designed for use on elite (12-pitch) typewriter.) EPA Form 8700-22 (Rev. 6-89) Form Approved. OMB No. 2050-0039, Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. ILD000714881 | Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law, but is required by Illinois law.

3. Generator's Name and Mailing Address: KEYSTONE STEEL & WIRE, 7000 S. ADAMS, PEORIA, IL 61641

Location If Different: C/O JACK SKELLEY

4. *24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS* 309-697-7020

A. Illinois Manifest Document Number: IL 6590011 FEE PAID IF APPLICABLE

B. Illinois Generator's ID: 1430050001

5. Transporter 1 Company Name: POLY-GENERICS CO.

6. US EPA ID Number: ILD981958101

C. Illinois Transporter's ID: 2272

D. (309) 691-8581 Transporter's Phone

7. Transporter 2 Company Name

8. US EPA ID Number

E. Illinois Transporter's ID

F. ( ) Transporter's Phone

9. Designated Facility Name and Site Address: CLAYTON CHEMICAL CO., 1 HORICE AVE, SAUGET IL 62201

10. US EPA ID Number: ILD066918327

G. Illinois Facility's ID: 1631210004

H. Facility's Phone: 618 271-0467

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. WASTE FLAMMABLE LIQUID NOS. (MINERAL SPIRITS/TETRACHLOROETHYLENE/OIL) 3, UN1993, PG III	002	DM	110		EPA HW Number XXD001; Authorization Number 000125
b.					EPA HW Number XX; Authorization Number
c.					EPA HW Number XX; Authorization Number
d.					EPA HW Number XX; Authorization Number

J. Additional Description for Materials Listed Above: D001/F002

K. Handling Codes for Wastes Listed Above In Item #14: G = Gallons Y = Cubic Yards

15. Special Handling Instructions and Additional Information: INVOICE POLY-GENERICS. CCC 8838

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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GENERATOR — Printed/Typed Name: JOHN R. SKELLEY — Signature: John R. Skelley — Date (Month Day Year): 050296

TRANSPORTER — 17. Transporter 1 Acknowledgement of Receipt of Materials — Printed/Typed Name: T.C. RINKACH — Signature: T.C. Rinkach — Date (Month Day Year): 050296

18. Transporter 2 Acknowledgement of Receipt of Materials — Printed/Typed Name — Signature — Date (Month Day Year)

FACILITY — 19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. — Printed/Typed Name: Pam Fenster — Signature: Pam Fenster — Date (Month Day Year): 050396

This Agency is authorized to require, pursuant to Illinois Revised Statute, 1989, Chapter 111 1/2, Section 1004 and 1021, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 1 - TOP MAIL TO GENERATOR

P.O. BOX 19276 SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6761

FOR SHIPMENT OF HAZARDOUS AND SPECIAL WASTE

State Form LPC 62 ... IL532-06

PLEASE TYPE (Form designed for use on elite (12-pitch) typewriter.) EPA Form 8700-22 (Rev. 6-89) Form Approved. OMB No. 2050-0039, Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. ILD000714 ...

Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law, but is required by Illinois law.

3. Generator's Name and Mailing Address: Republic Steel ... Zanesville Avenue, Pekin, Illinois

Location If Different: N.S.E.

4. *24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS* 309-477-3020

A. Illinois Manifest Document Number: IL6590011 FEE PAID IF APPLIC.

B. Illinois Generator's ID: 1430250001

5. Transporter 1 Company Name: Pel-Genesis, Inc.

6. US EPA ID Number: ILD...

C. Illinois Transporter's ID: 2272

D. Transporter's Phone: 309-...

7. Transporter 2 Company Name

8. US EPA ID Number

E. Illinois Transporter's ID

F. ( ) Transporter's Phone

9. Designated Facility Name and Site Address: Olin Corporation, ... Avenue, East St. Louis, IL 62201

10. US EPA ID Number: ILD041117327

G. Illinois Facility's ID: 1635210004

H. Facility's Phone: 618-271-0467

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. Waste flammable liquids, n.o.s. (Methyl Methacrylate Monomer) 3, UN1993, PG III	002	DT	110		EPA HW Number: XX0001; Authorization Number: 200125
b.					EPA HW Number: XX; Authorization Number
c.					EPA HW Number: XX; Authorization Number
d.					EPA HW Number: XX; Authorization Number

J. Additional Description for Materials Listed Above

K. Handling Codes for Wastes Listed Above: In Item #14 G=Gallons Y=Cubic Yards

15. Special Handling Instructions and Additional Information: Down Pel-Genesis. PO: PRP

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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Printed/Typed Name: Tom C. Holley | Signature | Date Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: W. Kinkel | Signature | Date Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name | Signature | Date Month Day Year

This Agency is authorized to require, pursuant to Illinois Revised Statute, 1989, Chapter 111 1/2, Section 1004 and 1021, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 6 - GENERATOR'S COPY

Clayton Chemical Company
Generator's Notification of Land Disposal Restriction

Generator Name KEYSTONE STEEL.
Generator I.D. No. ILD000714881 CCC No. 8856
Manifest No. 6590011 Line: ☑ 11A ☐ 11B ☐ 11C ☐ 11D
EPA Waste Codes
The waste Identified above is restricted from land disposal under 40 CFR 268 or RCRA Section 3004(d), as specified below. (Check all that apply)

☑ This shipemnt includes F001-F005 spent solvents, as identified on the reverse of this form. Check the hazardous waste number(s) that applies and circle or otherwise identify individual constituents likely to be present in the waste. See 40 CFR 268.41 and 268.42.

☐ This shipment includes F039 multi source leachate, as identified on the attached sheets(s). If this box is checked, attach a list of individual hazardous constituents expected to be present in the waste, along with applicable standards. See 40 CFR 268.43(a).

☐ This shipment includes RCRA Section 3004(d) California List wastes, as indentified on the attached sheet. If this box is checked, indicate individual constituents likely to be present.

☑ This shipment includes additional wastes identified below:

Hazardous Waste No.	Subcategory	Treatability Group 1	CFR Treatment Std. Reference 2	Treatment Standard 3
☑ D001	High TOC	Nonwastewater	268.42 Table 2	FSUBS,RORGS,IN
☐ D002	Acid (pH < 2.0)	Nonwastewater	268.42 Table 2	DEACT
☐ D002	Alkaline (pH > 12.5)	Nonwastewater	268.42 Table 2	DEACT
☐ D004		Nonwastewater	268.41 (a)	5.0 mg/L
☐ D006		Nonwastewater	268.41 (a)	1.0 mg/L
☐ D007		Nonwastewater	268.41 (a)	5.0 mg/L
☐ D008		Nonwastewater	268.41 (a)	5.0 mg/L
☐ D009	Low mercury (<260 mg/kg)	Nonwastewater	268.41 (a)	0.2 mg/l
☐ D010		Nonwastewater	268.41 (a)	1.0 mg/L
☐ D011		Nonwastewater	268.41 (a)	5.0 mg/L
☐ D035		Nonwastewater	268.41 (a)	200 mg/L
☐				
☐				
☐				

1 Treatability group is either "wastewater" or "nonwastewater".

2 To find te CFR reference for the treatment standard, look up the waste in 268.41(a) - Table CCWE;268.42(a)(1), (a)(2), (c), and Tables 2 and #; and 268.43(a) - Table CCW. The Reference must include both the section and paragraph where the treatment standard is found, e.g.268.42(a).

3 Wherever the CFR reference is 268.42, a five letter code (e.g. INCIN) must be included.

I certify under penalty of law that I am personally familiar with the above waste through testing and analysis, or through knowledge of the waste, and the information I have supplied on this certification is true and complete to the best of my knowledge.

Signed: [signature] Date: 5/2/96

Name: J Title:

Clayton Chemical Co.

Invoice# 18094

Broker: POLY GEN

CERTIFICATE OF RESOURCE RECOVERY

This certificate is to verify that the wastes and all containers specified on

Manifest # 6590011,

received from KEYSTONE STEEL & WIRE,

on 5/2/96, have been recycled to the extent

practicable by:

CLAYTON CHEMICAL COMPANY

#1 Mobile Street

Sauget, IL 62201

and that all residuals of recycling have been properly disposed of in accordance with all federal, state, and local hazardous waste regulations.

Signed: James Haney
James Haney

Title: Director of Administration

Date: 8-7-96

1 Mobile Street, Sauget, Illinois 62201-1069 • Telephone (618) 271-0467 • FAX (618) 271-9521

EMERAI
ENVIRONMEN

OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT
P.O. Box 7035
Indianapolis, IN 46207-7035

PLEASE PRINT OR TYPE (Form designed for use on elite (12-pitch typewriter.) Form approved. OMB No. 2050-0039. Expires 9-30-95

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No.: ILD007148811
Manifest Document No.: 1
2. Page 1 of 1
Information in the shaded areas is not required by Federal law, but items D, F, H, I and K are required by State law.

3. Generator's Name and Mailing Address: KEYSTONE STEEL & WIRE, 7000 S. W. ADAMS ST., PEORIA, IL. 61641 C/O JACK SKELLY
4. Generator's Phone: (309) 697-7020

A. State Manifest Document Number: INA 1210152
B. State Generator's ID: IL. IL. 1430050001

5. Transporter 1 Company Name: POLY-GENERICS CO.
6. US EPA ID Number: ILD981958101
C. State Transporter's ID: IL. 2272
D. Transporter's Phone: 301-641-8581

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address: POLLUTION CONTROL INDUSTRIES, 4343 KENNEDY AVE, E. CHICAGO, IND. 46312
10. US EPA ID Number: IND006469433
G. State Facility's ID: N/A
H. Facility's Phone: 219-397-3251

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol.	I. Waste No.
a HAZARDOUS WASTE LIQUID NOS (WATER/LATEX PAINT/NITROBENZENE) 9, NA3082, PG-III	012	DM	660	G	D036
b WASTE PETROLEUM NAPTHA 3, UN1255 PG-II	006	DM	330	G	D001
c ~~WASTE FLAMMABLE LIQUID NOS (PETROLEUM NAPTHA/[illegible]) 3, UN1993, PG-III~~		DM		G	D001
d ANTIFREEZE SOLUTION - NON HAZARDOUS (WATER/ETHYLENE GLYCOL) LIQUID.	001	DM	55	G	—

J. Additional Descriptions for Materials Listed Above
11a) OUT OF SPECIFICATION LATEX PAINT. 45958
11C) DIELECTRIC SOLVENT. 45959
11D) CLASS-A 45955

K. Handling Codes for Wastes Listed Above: S01

15. Special Handling Instructions and Additional Information: INVOICE POLY-GENERICS. PROF. #'S 4/26/96
11a: 120245 ~~11c: 120257~~
11b: 120247 11d: 127737 C: 507746 B: 507740

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations. A) 3501 #s B) 1751 #s D) 292 #s

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: JOHN R. SHELLEY Signature: John R. Shelley Date: Month 04 Day 25 Year 96

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: THOMAS RINKACH Signature: Thomas J. Rinkach Date: Month 04 Day 25 Year 96

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: Signature: Date: Month Day Year

19. Discrepancy Indication Space
11C: NOT SHIPPED - DRUMS EMPTY.

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: LINDA L. MAYDEN Signature: Linda L. Mayden Date: Month 04 Day 26 Year 96

INA

EPA Form 8700-22
Previous editions are obsolete
State Form 11865 (R2 / 1-94)

se of a spill call the Indiana Office of Environmental Response at 317/241-4336 (day or night) and the nal Response Center at 800/424-8802 or 202/426-2675.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT
P.O. Box 7035
Indianapolis, IN 46207-7035

PLEASE PRINT OR TYPE *(Form designed for use on elite (12-pitch typewriter.)* *Form approved. OMB No. 2050-0039. Expires 9-30-95*

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No. I.L.0.0.0.7.4.5.1.1 | Manifest Document No. | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law, but items D, F, H, I and K are required by State law.

3. Generator's Name and Mailing Address
KEYSTONE STEEL & WIRE
2000 S. W. ADAMS ST
PEORIA, IL. 61641

4. Generator's Phone (309) 673-7010

A. State Manifest Document Number INA 1210152

B. State Generator's ID IL. IL. 1450050001

5. Transporter 1 Company Name
Reynolds Trucking

6. US EPA ID Number I.N.D.0.7.1.7.5.1.0.1

C. State Transporter's ID IL. 2272

D. Transporter's Phone 30-4-1-5551

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
Pollution Control Industries
1243 Kennedy Rd
E. Chicago, Ind. 46312

10. US EPA ID Number I.N.D.0.4.8.4.1.1.5

G. State Facility's ID

H. Facility's Phone 219-397-3151

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol.	I. Waste No.
a HAZARDOUS WASTE LIQUID NOS (Contains Methylene Chloride) 9, NA3082, PG II	012	DM	660	G	D036
b Waste Petroleum Naphtha 3, UN1255, PG II	006	DM	330	G	D001
c ~~Waste Toluene (Contains Methyl Ethyl Ketone) 3, UN1294, PG II~~		DM		G	D001
d Waste Sludge Chromium Hydroxide (Contains Barium Sulfate) Liquid	001	DM	55	G	—

J. Additional Descriptions for Materials Listed Above
(1) [illegible]
(2) Barium Sulfate
(3) [illegible]

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
[illegible]

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

A) [illegible] B) [illegible] D) [illegible]

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: JOHN A. SHELLEY | Signature | Date: Month 04 Day 25 Year 16

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: [illegible] | Signature | Date: Month 04 Day [illegible] Year 16

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Date: Month Day Year

19. Discrepancy Indication Space
WE NOT [illegible] - [illegible]

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted item 19.
Printed/Typed Name: LINDA L. HAYDEN | Signature | Date: Month Day Year

GENERATOR / TRANSPORTER / FACILITY

INA 1210152

In the of a spill call the Indiana Office of Environmental Response at 317/241-4336 (day or night) and the National Response Center at 800/424-8802 or 202/426-2675.

EPA Form 8700-22
Previous editions are obsolete
State Form 11865 (R2 / 1-94)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No. [illegible] | Manifest Document No. [illegible]
2. Page 1 of 1 | Information in the shaded areas is not required by Federal law, but items D, F, H, I and K are required by State law.

3. Generator's Name and Mailing Address [illegible]
4. Generator's Phone [illegible]

A. State Manifest Document Number: INA 1210152
B. State Generator's ID [illegible]

5. Transporter 1 Company Name [illegible]
6. US EPA ID Number [illegible]
C. State Transporter's ID [illegible]
D. Transporter's Phone [illegible]

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address [illegible]
10. US EPA ID Number [illegible]
G. State Facility's ID [illegible]
H. Facility's Phone [illegible]

11. US DOT Description *(Including Proper Shipping Name, Hazard Class, and ID Number)*	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol.	I. Waste No.
a [illegible]	[illegible]	[illegible]	660	[illegible]	[illegible]
b [illegible]	[illegible]	[illegible]	330	[illegible]	[illegible]
c [illegible]		[illegible]		[illegible]	[illegible]
d [illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

J. Additional Descriptions for Materials Listed Above [illegible]
K. Handling Codes for Wastes Listed Above [illegible]

15. Special Handling Instructions and Additional Information [illegible]

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Printed/Typed Name [illegible] | Signature [illegible] | Date Month [illegible] Day [illegible] Year 16

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name [illegible] | Signature [illegible] | Date Month [illegible] Day [illegible] Year [illegible]

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Date Month Day Year

19. Discrepancy Indication Space [illegible]

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted item 19.
Printed/Typed Name | Signature | Date Month Day Year

GENERATOR / TRANSPORTER / FACILITY

INA 1210152

In case of a spill call the Indiana Office of Environmental Response at 317/241-4336 (day or night) and the National Response Center at 800/424-8802 or 202/426-2675.

EPA Form 8700-22
Previous editions are obsolete
State Form 11865 (R2 / 1-94)

FORM 1

Generator Name/Location KEYSTONE STEEL & WIRE PEORIA, IL.

EPA ID Number ILD000714881 Manifest Number INA 1210152

Waste Analysis Available ____ Yes ____ No X On file at facility Date 4-25-96

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA.	RCRA WASTE CODES (List all that apply)	SUBCATEGORY	TREATABILITY GROUP Please check the applicable treatability group.		CALIFORNIA LIST WASTES	REGULATED CONSTITUENTS FOR D001*, D002, D012-D043, F001-F005 & F039
				Nonwastewater >1% TOC & >1% TSS	Wastewater	List all applicable constituents from key below	List all applicable constituents from Table 1 and/or key below
a	b	c	d	e	f	g	h
11a) 120245							23. NITROBENZENE
11b) 120247		D001					
~~11c) 120253~~		~~D001~~					
11d) 127737	✓						

CALIFORNIA LIST WASTES (for Column g)

1) PCB ≥ 50 ppm 2) Halogenated Organic Carbon (HOC's) ≥ 1000mg/l 3) Nickel (Ni) ≥ 134mg/l 4) Thallium (Tl) ≥ 130mg/l

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005 (for Column h)

5) Acetone
6) Benzene
7) N-Butyl Alcohol
8) Carbon Disulfide
9) Carbon Tetrachloride
10) Chlorobenzene
11) Cresols (o, m, or p isomers)
12) Cresylic Acid
13) Cyclohexanone
14) 1,2-Dichlorobenzene
15) Ethyl Acetate
16) Ethyl Benzene
17) Ethyl Ether
18) Isobutanol (Isobutyl alcohol)
19) Methanol
20) Methylene Chloride
21) Methyl Ethyl Ketone
22) Methyl Isobutyl Ketone
23) Nitrobenzene
24) Pyridine
25) Tetrachloroethylene
26) Toluene
27) 1,1,1 Trichloroethane
28) 1,1,2 Trichloroethane
29) 1,1,2 Trichloro 1,2,2, Trifluoroethane
30) Trichloroethylene
31) Trichlorofluoromethane
32) Xylene (Total)

I certify under penalty of law that the above information is accurate and true.

Signature John R. Shelley Print Name JOHN R. SHELLEY

Process Descriptions

Arc Shop (Steel Works)

Keystone operates two 180 ton capacity, Whiting AC electric arc furnaces currently producing 650,000 to 700,000 tons per year of hot metal. These furnaces produce low carbon steel from ferrous scrap using two operational scenarios: single furnace and alternating furnace.

(1) Single Furnace Operation (see Drawing No. D-21787 Process Flow Diagram)

1. Ferrous scrap is sorted into specific sizes and grades in the Steel Works Scrap Yard, then loaded into charge buckets and brought into the Arc Shop via the scrap rail cars.

2. 4000 to 8000 lbs. of lime is dumped either into the scrap bucket or into the furnace along with 80 to 100 tons of ferrous scrap for the initial scrap charge into the furnace.

3. Dump hoppers are loaded with 4000 to 8000 lbs of lime and 1000 to 6000 lbs. of coal or coke to be charged into the furnace prior to the initial scrap charge.

4. The furnace roof is swung open and the dump hopper of lime and coal or coke is charged to the furnace.

5. The initial charge of scrap is charged to the furnace.

6. The furnace lid is closed and scrap preheating begins using the oxy-fuel burners. (The use of the oxy-fuel burners is continuous throughout the entire cycle, however flow rates vary at several steps.)

7. Melting commences using the electric arc.

8. The electric power is cut to the electric arc, the furnace is opened and the second charge bucket of 50 to 70 tons of ferrous scrap is charged to the furnace. The second charge bucket of scrap may also contain 4000 to 8000 lbs of lime depending on the grade of steel and the scrap mix.

9. The furnace roof is closed and melting using the electric arc resumes.

10. The electric power is cut to the electric arc, the furnace is opened and the third charge bucket of 40 to 100 tons of ferrous scrap is charged to the furnace. The third charge bucket of scrap may also contain 4000 to 8000 lbs of lime depending on the grade of steel and the scrap mix.

11. The furnace roof is closed and melting using the electric arc resumes.

12. Foamy slag is injected to aid in the formation of slag and to purify the steel as the heat nears completion. The oxygen lance is used to reduce carbon in the melt and to facilitate melting.

13. Slag is poured off into the slag pit below the furnace.

14. The ladle is brought into position and the heat is tapped into the ladle. Ferro alloys are added to the ladle of molten steel. (Amounts of ferro alloys depend on the grade of steel being produced)

15. The ladle is placed on the ladle transfer car and taken to the Ladle Metallurgy Station.

(2) Alternating Furnace Operation
The alternating furnace operation is both furnaces operating under Steps 1-15 of the single furnace operation in any combination of steps *except* that only one furnace at a time will operate the electric arc. Keystone uses the alternating furnace operation to maximize steel production and to keep furnace emission rates as low as possible.

Keystone will be discontinuing the alternating furnace operation in the second half of 1997. The single furnace operation will be modified to include the ladle metallurgical furnace that will eliminate the refining step (No. 14 above) in the electric arc furnace. All refining will be conducted in the ladle metallurgical furnace once the alternating furnace operation is discontinued.

The fume emissions from the electric arc furnaces are controlled by the direct evacuation control (DEC) and the overhead canopy system with two positive pressure baghouses. The emission control dust (K061) is manifested offsite to Peoria Disposal Company where it is stabilized to the appropriate Land Disposal Restrictions and landfilled. Slag from the Arc Shop is processed by Midwest Mill Services onsite and sold as various construction aggregate and road bed material.

Ladle Metallurgical Furnace (Steel Works)
The ladle metallurgical furnace will be used for refining steel after the primary electric arc furnace has melted the scrap into molten metal. The ladle of hot metal will be brought to the ladle stand and put in place at the ladle metallurgical furnace. Depending on the recipe for the specific grade of steel to be made, various amounts of ferroalloys, lime, and coal or coke will be added. The ladle will be stirred and heat will be applied by three AC carbon electrodes. Once the refining is accomplished, the ladle of molten refined steel is transported to the continuous caster. Emissions from the ladle metallurgical furnace will be ducted to the main Arc Shop Ventilation system. (see Drawing No. D-21096)

Ladle Metallurgical Station (Steel Works)
The ladle metallurgical station will be used for stirring and adding specific additives for refining steel after the primary electric arc furnace has melted the scrap into molten metal, but prior to the ladle metallurgical furnace or the caster. The ladle of hot metal will be brought to the ladle stirring stand and put in place at the ladle metallurgical station. Boron will be wire fed into the ladle for boron heats as required. The ladle will be stirred to homogenize the melt prior to the ladle metallurgical furnace or the caster. Emission control will be provided by the Arc Shop Canopy Hoods in a similar manner as the control of tapping emissions from the EAF's. (see Drawing No. D-21787)

Ladle Preheating (Steel Works)
Ladle preheating is the process of heating the ladles prior to tapping to insure that premature freezing of the molten steel does not occur. The ladle is placed in the ladle stand and the preheater is lowered onto the top of the ladle. The natural gas burner in the preheater cover heats the cold refractory lined ladle to 2500-3500° F and keeps the ladle at that temperature till the

ladle is needed for tapping a heat from one of the EAF's. (see Drawing No. D-21787)

Continuous Caster (Steel Works)
Keystone operates a 6-strand Continuous Caster which produces 5"x 5"x 50' billets from the molten steel produced at the Arc Shop. Molten steel is poured from the ladle into a tundish, then into 6 molds which produce the billet shape. The 6 forming billets travel down through the cooling zone and are cut to length by an automatic natural gas-oxygen cutting torch at the end of each billet's strand. The billets are then further cooled on a walking beam cooling bed before being loaded on a rail car and transported to the Rod Mill. Emissions from the Continuous Caster are controlled by a roof canopy and negative pressure baghouse.(see Drawing No. D-21095).

Rod Mill (Steel Works)
Keystone operates a 2-strand Morgan Hi-Reduction "V" Mill utilizing a pusher reheat furnace with a recuperator. The Rod Mill receives billets from the Continuous Caster, reheats them to 2250°F, and sequentially rolls the billets into rod coils. (see Drawing No. D-21088).

Mill scale produced at the Rod Mill and Caster is sold as basic oxygen furnace feedstock material.

Steam Plant Boiler #1 (Steel Works)
Steam is generated on a standby basis only by Boiler #1 using #2 fuel oil. During times of natural gas curtailment, Boiler #1 is started and will continue to operate until such time as the curtailment is lifted. If no curtailments happen during the course of the year, Boiler #1 is run for two to three weeks to keep it in operational condition. (see Drawing No. B-21080)

Steam Plant Boiler #3 (Steel Works)
Steam is generated by Boiler #3 using natural gas. Boiler #3 runs continuously all year except during times of natural gas curtailment when steam production is switched to Boiler #1. If no curtailments happen during the course of the year, Boiler #3 is shut down for two to three weeks so Boiler #1 can be run to keep Boiler #1 in operational condition. (see Drawing No. B-21080)

Cleaning #1 - Circular Process Cleaning (Wire Mill)
Rod cleaning is performed to remove the scale formed on the rods while cooling after being manufactured in the Rod Mill. Cleaning is a process of soaking the rod coils in sulfuric acid tanks, double rinsing, dipping the rods into a coating tank (borax or lime), and drying the rods using a flash baker. Circular process rod cleaning is performed in Keystone's Wire Mill using two cleaning circles and five flash bakers for drying the rods (Drawing No. D-20949). Forklifts carry the rod to the cleaning circles for processing. In the middle of each circle is a revolving crane which picks up the rods and transports them from tank to tank. Once the cleaning cycle has been completed, forklifts carry the rods to one of the five flash bakers for drying before being delivered to the Drawing Department.

Cleaning #3 - In-Line Cleaning Process (Mid Mill)

Rod cleaning is performed to remove the scale formed on the rods while cooling after being manufactured in the Rod Mill. Cleaning is a process of soaking the rod coils in sulfuric acid tanks, double rinsing, dipping the rods into a coating tank (borax or lime), and drying the rods using a flash baker. In-Line rod cleaning is performed at Keystone's Mid-Mill using an in-line series of four sulfuric acid tanks, one rinse tank, one borax coating tank, two lime coating tanks, a drying area, and two flash bakers. The permangenate cleaning and zinc phosphate coating is done in a second line with a series of two permanganate tanks, two rinse tanks and one zinc phosphate tank (Drawing No. D-20957). Fork lifts transport the rod to the head of the rod transfer area to begin the cleaning cycle. A traveling crane moves the rods from tank to tank during the cleaning cycle. Once the cleaning and coating cycle is complete, the traveling crane transports the rods back to the rod transfer area where forklifts pick up the rods for further processing.

Acid Recovery (services Wire Mill & Mid Mill)

Acid Recovery is a completely enclosed, closed loop system that removes iron from the pickling solutions from Cleaning #1 and Cleaning #3. The acid is pumped from the Cleaning Units to Acid Recovery where it is stored in the High Iron Tank until enough is collected to run a batch. The acid is then chilled through a refrigeration unit to approximately 40°F to start crystallizing the iron sulfate. The refrigerated solution is then run through a centrifuge that separates the crystals from the liquid. The liquid is piped to the Low Iron Tank and the crystals are dropped into a loading bunker. The acid in the Low Iron Tank is pumped back to Cleaning #1 and Cleaning #3 for further use. The ferrous sulfate heptahydrate crystals are then sold to Crown Technologies in Indianapolis, IN.

Wire Drawing (Wire Mill & Mid Mill)

Drawing is the process where cleaned rod is pulled through dies to size the wire to the desired diameter. Cleaned rod is uncoiled, pulled through a series of dies, and recoiled on either spools or wire carriers. Once the wire is drawn, it can be sent for packaging or further processing.

Wire Galvanizing (Wire Mill & Mid Mill)

Wire Galvanizing is a continuous process which applies a uniform zinc coating over the surface of the wire. Each galvanizing frame has in succession an annealing furnace (lead pan, fluidized bed, or pass furnace), a quench bath, an acid pickling shed, a flux tank, a preheater, and a zinc pan (Drawing Nos D-21045, D-21046, D-21047, 20947, D-21048, D-20946, D-21049, D-21051, and D-29042). The basic process steps are:

1. The wire is unspooled and guided into the lead pan (Frames 2, 3A, 5, 8, 13, 14), fluidized bed (Frames 7, 11), or pass furnace (Frame 9).

2. The wire is guided through the lead pan, fluidized bed, or pass furnace which anneals and cleans the wire at approximately 1300°F.

3. The wire is run thru a quench bath.

4. The wire is run into the acid pickling shed where it is dipped into 25-30% hydrochloric acid to further clean the wire surface. The heat from the wire running through the acid tank maintains the acid temperature at approximately 120°F.

5. The wire is dipped into a flux solution tank (ammonium chloride or zinc ammonium chloride) to coat the wire with flux prior to coating the wire with zinc. The flux tank is live steam sparged and is kept at approximately 180°F.

6. The wire is dried under the flux dryer (natural gas burners).

7. The wire is dipped into the molten zinc in the zinc pan, then quenched as it exits the zinc pan to freeze the zinc coating on the wire.

8. The wire is re-spooled back onto the wire carriers, spools, or other similar devices.

Frames 2 & 14 are being relocated and combined into one Frame 14 to be located in the Mid Mill. Commissioning to take place in the summer 1997.

Galv. Afterweave (Wire Mill)

Galv. Afterweave is a process in which galvanized wire netting is given a second coat of zinc to make the netting extremely corrosion resistant. The product is saltwater netting which is used to make crab traps and crab pots. Galvanized wire is first woven into netting by Keystone's Netting Department, then the netting is taken to Galv. Afterweave. The netting is first dipped into a hydrochloric acid bath, then into an ammonium chloride flux tank to prepare it for the zinc coating. The netting is then dipped into a molten zinc bath, cooled, and coiled for packaging. (see Drawing No. D-21004).

Wire Paint Wipe (Wire Mill)

Galvanized wire is painted at Frames 5, 11, and 13 by means of passing the wire through a power roller/wipe assembly. Galvanized wire exiting the zinc pan quench bath is passed through the power roller wipe assembly and coated with the water based red enamel. The drippings are collected and re-pumped through the roller/wipe assembly to obtain the highest coverage for the red enamel used. The red enamel coated galvanized wire dries as it travels between the roller/wipe assembly and the spooler. (Drawing No. C-21003).

Muffle Annealing (Mid Mill)

Muffle annealing is a process of heat treating wire in a reducing atmosphere. Wire is placed on a base with a shell (or retort) placed over it. A reducing atmosphere of 95% nitrogen and 5% hydrogen is created and maintained inside the shell for the duration of the heat treating. A muffle furnace is placed over the retort and the furnace heats the retort and contents to approximately 1800°F (natural gas-air heating is used in the muffle furnace). The heating and cooling time for the heat treating cycle is dependent on the desired level of temper in the wire. Keystone has 36 bases and 9 muffle furnaces available for the heat treating of wire. A maximum of 9 furnaces can be fired at once, however the furnaces are cycled over the 36 bases to yield the maximum use of the heat treating operation. (see Drawing No. D-20984)

Nail Cleaning (Wire Mill)
Nails are cleaned and degreased in a spiral flow cleaner with a sodium hydroxide, water based cleaner at a solution temperature of 180-200°F to remove all drawing lubricants, then rust inhibitor is applied as necessary for corrosion protection. The nails are dried in a rotary tumbler dryer prior to loading into a tote box.

Hot Nail Galvanizing (Wire Mill)
Hot nail galvanizing is a process that produces rough, weather resistant coating on a nail by means of heating zinc, tin , crystallized flux (zinc ammonium chloride), and nails in a rotating drum furnace. The basic process is to load a batch of nails, zinc pellets, tin shot, and crystallized flux (zinc ammonium chloride) into a steel drum, then begin rotating the drum and place it into the furnace. After heating for 5-9 minutes, the drum is removed from the furnace and the nails are dumped out and quenched. The wet, quenched nails are then fed into a rotating drum dryer then loaded into a tote for transporting to nail packaging (see Drawing Nos D-21053, D-21054, D-21055, D-21056, D-21057, and D-21058).

Transiflo (Cold Nail Galvanizing) (Wire Mill)
Transiflo (cold nail galvanizing) is a process where zinc is deposited on the nail and "peened" by glass beads to a shiny finish. This is done by adding nails, zinc dust, 8801 or 8401 Accelerator (tin oxide), 9100 (sulfuric acid and copper chloride solution) or 9800 (50% sulfuric acid), defoamer, glass beads, and water to a large tumbler and tumbling the solution for a specific period of time. The drum contents are emptied out, glass beads and nails are separated, and the nails are dried by a natural gas rotating drum dryer. (see Drawing No. D-20932)

Green Nail Coating (Wire Mill)
Nails to be coated are first cleaned with a sodium hydroxide, water based cleaner to remove all drawing lubricants. The nails are rinsed in warm water and dried at 300°F to preheat the nails prior to coating. The nails are then fed into the spiral flow coating machines, coated, dried at 475°F, and loaded into totes for delivery to nail packaging (see Drawing No. D-21098).

Stockade Panel Paint Spray Booth (Wire Mill)
Stockade panels manufactured in Keystone's Fabric Department are hand spray painted with a water-based red spray paint in a large paint spray booth. The paint overspray mists are filtered out of the booth exhaust air before the air is discharged outside the building (see Drawing No. 21103).

Self-Furring Keymesh Painting (Wire Mill)
Keymesh or stucco-mesh is woven on the netting machine into the desired pattern and size. Specific dots of paint are placed on the mesh to show installers where to tack up the mesh for proper stucco installation. A paint trough with a two stage roller system is placed on the netting machine prior to the rolling step. As the netting passes over the rollers, only specific spots on the netting touch the rollers and get a dot of red paint applied (see Drawing No. B-21097).

Process Flow Charts

The following drawings show the process flow and emissions for the described processes. These flow diagrams (except for Arc Shop,Muffle Annealing, and Transiflo) are taken from Keystone's Title V-CAAPP Permit Application No. 95120288 submitted to the IEPA on December 22, 1995.

Figure	Drawing	Process
Figure 5.	D-21787	Arc Shop
Figure 6.	D-21096	Ladle Metallurgical Furnace
Figure 7.	D-21095	Continuous Caster
Figure 8.	D-21108	Continuous Caster Baghouse
Figure 9.	D-21088	Rod Mill
Figure 10.	D-21080	Steam Plant
Figure 11.	D-20949	Cleaning #1
Figure 12.	D-20957	Cleaning #3
Figure 13.	D-21045	Frame 2
Figure 14.	D-21046	Frame 3A
Figure 15.	D-21047	Frame 5
Figure 16.	D-20947	Frame 7
Figure 17.	D-21048	Frame 8
Figure 18.	D-20946	Frame 9
Figure 19.	D-21049	Frame 11
Figure 20.	D-21051	Frame 13
Figure 21.	D-29042	Frame 14
Figure 22.	D-21004	Galv. Afterweave
Figure 23.	C-21003	Wire Paint Wipe
Figure 24.	D-20984	Muffle Annealing
Figure 25.	D-21053	Hot Nail Galv.-Unit 2
Figure 26.	D-21054	Hot Nail Galv.-Unit 3
Figure 27.	D-21055	Hot Nail Galv.-Unit 4
Figure 28.	D-21056	Hot Nail Galv.-Unit 5
Figure 29.	D-21057	Hot Nail Galv.-Unit 6
Figure 30.	D-21058	Hot Nail Galv.-Unit 7
Figure 31.	D-20932	Transiflo
Figure 32.	D-21098	Green Nail Coating
Figure 33.	D-21103	Stockade Panel Paint Spray Booth
Figure 34.	B-21097	Self-Furring Keymesh Painting

Current Permits

The following permits are the major current permits for Keystone. Copies of the following permits are provided in this section:

NPDES Permit No. IL0002526
Closed Loop Permit 1995-EB-4062
Title V-CAAPP Completeness Determination
IEPA Construction and Operating Air Permits (Steel Works)

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

J. Shelley

Mary A. Gade, Director
217/782-0610

2200 Churchill Road, Springfield, IL 62794-9276

December 26, 1995

Keystone Steel and Wire Company
7000 S.W. Adams Street
Peoria, Illinois 61641

Re: Keystone Steel and Wire Company
Keystone Steel and Wire Company
NPDES Permit No. IL0002526
Final Permit

Gentlemen:

Attached is the final NPDES Permit for your discharge. The Permit as issued covers discharge limitations, monitoring, and reporting requirements. The failure of you to meet any portion of the Permit could result in civil and/or criminal penalties. The Illinois Environmental Protection Agency is ready and willing to assist you in interpreting any of the conditions of the Permit as they relate specifically to your discharge.

The Permit as issued is effective as of the date indicated on the first page of the Permit. You have the right to appeal any condition of the Permit to the Illinois Pollution Control Board within a 30 day period following the issuance date.

To assist you in meeting the self-monitoring and reporting requirements of your reissued NPDES permit, a supply of preprinted Discharge Monitoring Report (DMR) forms for your facility is being prepared. These forms will be sent to you prior to the initiation of DMR reporting under the reissued permit. Additional information and instructions will accompany the preprinted DMRs upon their arrival.

Should you have questions concerning the Permit, please contact Richard E. Pinneo at the telephone number indicated above.

Very truly yours,

Thomas G. McSwiggin, P.E.
Manager, Permit Section
Division of Water Pollution Control

SFN:REP\95091901.PSJ

Attachment: Final Permit
cc: Records/CAS
USEPA
Peoria Region

Printed on Recycled Paper

Current Programs

Integrated Site Safety and Contingency Plan

Keystone began the process of formulating and drafting an Integrated Site Safety and Contingency Plan in October 1995. This plan will incorporate the current Hazardous Waste Contingency Plan, current HAZCOM Program, existing SPCC Plan, a new Emergency Response Plan, updated Waste Minimization Plan, a new Pollution Prevention Plan, and provide a reference source for hazardous material handling, response, and disposal for Keystone's employees. Currently, 4 weeks of 24-hour HAZWOPER training have been conducted with 80 employees having completed the training. This is the first step in implementing the new Emergency Response Plan of the Integrated Site Safety and Contingency Plan. Other training (8-hour Incident Commander, First Responder, etc.) will be performed later this year.

The Integrated Site Safety and Contingency Plan is nearing final draft and will be a living document as Keystone's program evolves. Once the plan has been finalized, it will be sent to the local fire dept., police dept., hospital, ambulance service, Peoria County ESDA, Illinois Emergency Management Agency (IEMA), IEPA, and the IL State Police for comment and approval.

Waste Minimization

Keystone actively investigates to the fullest practical extent alternate methods, materials, chemicals, or processes that minimize waste and improve production process economics. Examples of this effort include:

- Eliminating the use of 1,1,1-TCA and TCE and switching to an alkaline based degreaser for nail cleaning.
- Switching from petroleum naptha degreasers to citrus based D-limonene degreasers in the Wire Mill Die Shop and in the Steel Works Electrical Shop.
- Switching to water-soluble oils for coating drawn wire.
- Installation of the Acid Recovery System that removes iron from the pickling solutions in Cleaning #1 and Cleaning #3. This reduces the amount of sludge produced at the WWTP and converts the iron to a salable product (ferrous sulfate heptahydrate crystals).
- Switching from solvent based paints to water based paints for wire painting on barbed wire and fencing products.
- Conversion from lead annealing furnaces to fluidized bed furnaces for annealing wire prior to galvanizing.

Arc Dust Recycling Investigation

Keystone has been investigating arc dust (K061) recycling methodology since 1994. Several US and European technologies appear to show promise for onsite or regional recycling facilities. Keystone is actively pursuing these promising technologies to eliminate the liability of stabilizing and landfilling K061.

III. COMPLIANCE STATUS

Clean Air Act

In September, 1995, Keystone retained an independent environmental engineering firm, Lake Engineering, Inc., for the purpose of reviewing Keystone's compliance with existing state air permits and preparing a Title V permit application. This project also included a review of compliance with SIP regulations and federal regulations such as Prevention of Significant Deterioration (PSD) and New Source Performance Standards (NSPS). The following sections will serve to summarize Lake Engineering's findings.

State Issued Air Permits

Background

The Steel Works operated by Keystone in Peoria, Illinois, consists of three main emission sources: the Arc Shop, the Continuous Caster, and the Rod Mill reheat furnace. Each of these components is permitted separately by Illinois EPA (See Appendix). The Caster permit contains limits for particulate matter (TSP & PM_{10}), but does not require emissions testing to establish compliance. A comparison of the total dust collected by the Caster Baghouse confirmed that the emission factors used to estimate the emissions were accurate. The permit for the Rod Mill reheat furnace contains limits for PM, NO_X, CO, and SO_2 and required the installation of low-NO_X burners. The limits for PM, CO, and SO_2 are based upon AP-42 emission factors for uncontrolled natural gas combustion and are assumed to be reliable. The reheat furnace was tested for compliance with the NO_X emission limit subsequent to the installation of the low-NO_X burners. The results of this compliance test showed that the Rod Mill is in compliance with the permitted limit of 0.176 lb/ton (See Appendix). A review of the Arc Shop permit revealed that the emission limits for PM, CO, and NO_X for the Arc Shop are uncharacteristically low by comparison with test results for similar plants in the steel industry.

In a meeting held on October 2, 1995 to discuss Title V permitting, the Arc Shop emission limit discrepancy was brought to the attention of IEPA who directed Keystone to supply revised emissions estimates in their Title V permit application. These revised estimates were reviewed by IEPA in a meeting held a year later on October 10, 1996 for the purpose of discussing future permitting. IEPA expressed concern regarding the new estimates and directed Keystone to review the original estimating methods used in past permit applications and to compare them with the values used in the permitting of similar steel mills around the country.

A review of past construction permit applications for the Arc Shop revealed that the permitted emission limits were based upon the emissions estimates supplied by Keystone in permit applications submitted to IEPA in April, 1992 and September, 1995. In these applications, the emissions were estimated using uncontrolled emission factors published in AP-42 and estimated control efficiencies for the control devices at the Arc Shop. In the case of particulate matter, Keystone estimated that the Arc Shop Baghouses would reduce PM emissions from an uncontrolled rate of 38 lb/ton as specified in AP-42 to 0.043 lb/ton. This would require an

unusually high control efficiency of 99.887%. The roof monitor emissions were calculated based upon the published uncontrolled emission factor for charging, tapping, and slagging of 1.4 lb/ton and a canopy capture efficiency of 90% resulting in an estimated emission factor of 0.14 lb/ton. The combined estimated emission factor for the baghouse and roof emissions was therefore estimated to be 0.183 lb/ton. The CO emissions were estimated to be 0.18 lb/ton by using the published AP-42 uncontrolled factor of 18 lb/ton and an estimated control efficiency of 99% attributed to the use of a direct emission control (DEC) system. The NO_X emission factor of 0.15 lb/ton used in the permit applications was based upon estimates found in the National Acid Precipitation Assessment Program's "Criteria Pollutant Emission Factors for the 1985 NAPAP Emissions Inventory."

A review of the permit limits and stack test results for similar steel mills revealed that Keystone's original emissions estimates, and consequently the corresponding permitted emission limits, are too low. This was primarily due to a lack of substantial data for baghouse and DEC control efficiencies at that time. Similar steel mills which have performed compliance tests in recent years have discovered that an appropriate control efficiency for their baghouses is about 99.5% as compared to 99.887% used by Keystone in the permit applications. Also, other steel mills which make use of a DEC system have found that their controlled CO emissions ranged from about 1 to 3 lb/ton instead of 0.18 lb/ton as estimated by Keystone. Furthermore, the NO_X emissions from similar mills ranged from about 0.3 to 0.5 lb/ton rather than 0.15 lb/ton as published in the NAPAP documents.

In order to determine the actual emissions from the Arc Shop more accurately, Keystone decided on November 20, 1996 to perform a series of engineering emissions tests. The tests were scheduled for March 3-7, 1997 to allow completion of a set of permitted modifications so the electric arc furnaces could be operated in a manner resembling their ultimate configuration. A report of the test results is attached.

Compliance Evaluation

The following table shows a summary of Keystone's emissions testing results and the corresponding emission limits found in the current permit. The emission factors have been calculated by dividing the mass emission rates in pounds per hour by the average production rate of 86.2 tons of steel per hour. The PM_{10} emissions have been calculated as 76% of the total suspended particulate matter (TSP) based upon the results of particle size analysis performed at the time of testing. For the purposes of evaluating compliance with the particulate emissions limits, the permit limits shown in the table reflect only the portion assigned to the baghouses. Since there is no accurate way to measure the emissions from the Arc Shop's roof monitor, they are assumed to be in compliance with the portion of the limit assigned to them. As shown in **Table 1**, the Arc Shop will probably not be able to comply with its permit limits for TSP, PM_{10}, CO, and NO_x.

TABLE 1
ARC SHOP TEST RESULTS vs. PERMIT LIMITS

Pollutant	Test Results		Permit Limits	
	Emission Rate (lb/hr)	Emission Factor (lb/ton)	Emission Rate (lb/hr)	Emission Factor (lb/ton)
Particulate Matter (TSP)	24.85	0.288	4.03[1]	0.043[1]
Particulate Matter (PM_{10})	18.89	0.22	2.42[1]	0.026[1]
Carbon Monoxide (CO)	125.6	1.46	16.92	0.18
Nitrogen Oxides (NO_x)	59.5	0.69	14.10	0.15
Volatile Organic Compounds[2]	8.5	0.10	12.22	0.13

1. The expressed permit limits for TSP/PM_{10} are 17.20/10.34 lb/hr and 0.183/0.110 lb/ton. However, the permit limits include the contribution from the roof monitor. The figures shown in this table reflect the portion of the emission limits assigned to the baghouses.
2. Volatile Organic Compounds are denoted as (VOC) in permit. The test results are actually measured as Total Hydrocarbons (THC).

In the process of evaluating compliance with the current permitted emission limits, Lake also uncovered apparent violations of the production limits contained in the permit for the Arc Shop, Caster, and Rod Mill in 1989, 1990, and 1991. The limits were established in a set of permits issued in 1988 and were in effect until the permits were amended in 1992. **Table 2** below shows a comparison of the permitted production limits and the actual production for each of the facilities.

TABLE 2
PRODUCTION LIMITS vs. ACTUAL PRODUCTION

Facility	Pre-1992 Permitted Production Limit (tons/yr)	Actual 1989 Production (tons/yr)	Actual 1990 Production (tons/yr)	Actual 1991 Production (tons/yr)
Arc Shop	604,800	615,875	637,609	638,934
Caster	493,920	583,971	609,820	612,648
Rod Mill	635,040	574,731	623,784	643,940

Keystone's operating permit also includes a condition requiring the submittal of an operating program to control fugitive emission sources. This document was prepared by Keystone and submitted to IEPA. The program includes the use of road sweepers, chemical dust suppressants, and water spray for storage piles. Keystone has maintained compliance with the operating program except in the case of wet suppression of hot slag piles behind the arc shop. It was determined by Keystone, subsequent to the submittal of the operating program, that the

application of water spray to hot slag was extremely hazardous. For this reason, Keystone has discontinued this practice.

Prevention of Significant Deterioration (PSD) {40 CFR 52.21}

Background

Although the permit and production limits in the 1992 and 1995 permit applications were established to prevent Keystone from exceeding the PSD thresholds, *the apparent violation of these limits does not necessarily mean that PSD has been triggered.* A separate evaluation of PSD applicability is necessary based upon a review of the modifications and the resulting actual emissions increases. The PSD regulations require companies who propose "major modifications" to "major sources" to obtain a federally mandated construction permit prior to commencing construction. Keystone's Steel Works is considered a "major source" because it emits more than 100 tons per year of one or more of the criteria pollutants such as PM, CO, and NO_x. In order to avoid having to obtain a PSD construction permit during a modification, a major source must accept permit limits restricting the increase in emissions below the "significant" threshold values. The permits issued to Keystone by the IEPA have attempted to do this by including production limits and emission factor limits. Now that it is apparent the emission factor limits cannot be achieved, the annual emissions subsequent to the modifications made at the Arc Shop have been evaluated to determine it they triggered the PSD regulations.

Initial Screening

For the purpose of determining if any of Keystone's modifications were "major modifications," an initial screening was done based upon emission factors derived from the test results and the increases in allowable production which were granted by Illinois EPA in 1992 and 1995. In 1992, Keystone proposed a 2-phase project to modify the Arc Shop and increase production from the existing limit of 604,800 tons per year. The Phase I modifications were to be implemented immediately and would increase production to 750,000 tons per year. In 1995, Keystone applied for the Phase II modifications and requested an increase in production to 850,000 tons per year. Therefore, the increase in allowable production of 245,200 tons per year can be used to determine a worst case emissions increase for each pollutant.

Table 3 shows the potential emissions increases due to these production increases and compares them to the PSD "significant" thresholds. The emission factors used for this analysis are based upon the results of the recent Arc Shop emissions testing. Also, the particulate emissions from the Arc Shop's roof monitor were added to the baghouse emissions to provide a total Arc Shop emission figure. This analysis assumes that the emission factors remained the same before and after the modifications were implemented. Based upon the modifications which were done at the Arc Shop, it is safe to assume that none of the emission factors increased.

TABLE 3
POTENTIAL EMISSIONS INCREASES VS. PSD MAJOR MODIFICATION THRESHOLDS

Pollutant	Emission Factor (lb/ton)	Allowable Production Increase (tons/yr)	Potential Emissions Increase (tons/yr)	PSD Major Modification Threshold (tons/yr)
Particulate Matter (TSP)	0.430	245,200	52.72	25
Particulate Matter (PM_{10})*	0.330	245,200	40.46	15
Lead (Pb)*	0.010	245,200	1.23	0.6
Carbon Monoxide (CO)	1.460	245,200	179.00	100
Nitrogen Oxides (NO_x)	0.690	245,200	84.59	40
Volatile Organic Compounds	0.100	245,200	12.26	40
Sulfur Dioxide (SO_2)	0.260	245,200	31.88	40

* PM_{10} and lead emissions are estimated as 77% and 2.4% of the TSP emissions, respectively.

The above table shows that the potential increases in VOC and SO_2 emissions could not have triggered PSD even if the Arc Shop increased its production to 850,000 tons per year and the emissions factors for these pollutants remained the same. However, the TSP, PM_{10}, lead, CO, and NO_x potential increases are above the thresholds defined by PSD. Therefore, an additional analysis has been done to determine if the actual increases in emissions of these pollutants are above the PSD thresholds.

Evaluation of Actual Emissions Increases

In order to analyze the actual emissions increases, Lake Engineering developed the following tables of the actual emissions from the Arc Shop, Caster, and Rod Mill reheat furnace. The annual production figures for all three departments were taken from actual Keystone production records (see Appendix) except for 1997 and 1998 which have been estimated. Although the emissions increases from the Caster and Rod Mill are small compared with the Arc Shop, the PSD regulations allow for "netting" of contemporaneous emissions increases and decreases on a plant-wide basis. Following the individual tables, a table of the total plant emissions is presented for comparison with the PSD "significant" thresholds. Modifications are indicated on the tables by horizontal double lines between the years in which the modification took place. For instance, the double line between the 1992 and 1993 on the Arc Shop emissions table indicates the point where the modifications known as Phase I were implemented.

The emission factors used for the Arc Shop are primarily the same as those developed from the emissions tests except in those cases where it can be shown that the emission factor was different prior to a modification. Additionally, lead has been dropped from the analysis at this point due to the relationship between lead and particulate matter. The ratio of lead emissions to total PM

emissions is approximately the same as the ratio of their PSD thresholds. Therefore it can be assumed that if the PM emissions trigger PSD, so will the lead emissions. The Rod Mill reheat furnace and the Caster emission factors have been taken from their respective operating permits. There has been no indication that these facilities exceed these limits. Each of the changes in emission factors caused by a modification are explained on the following pages below the pertinent table.

TABLE 4
ARC SHOP ACTUAL EMISSIONS

Year	Production (tons/yr)	Emission Factor (lbs/ton)				Annual Emissions (tons/yr)			
		TSP	PM_{10}	CO	NO_x	TSP	PM_{10}	CO	NO_x
1981	638,612	0.64	0.49	3.40	0.69	204.4	156.5	1085.6	220.3
1982	516,672	0.64	0.49	3.40	0.69	165.3	126.6	878.3	178.3
1983	258,139	0.64	0.49	3.40	0.69	82.6	63.2	438.8	89.1
1984	301,800	0.64	0.49	3.40	0.69	96.6	73.9	513.1	104.1
1985	291,377	0.64	0.49	3.40	0.69	93.2	71.4	495.3	100.5
1986	364,337	0.64	0.49	3.40	0.69	116.6	89.3	619.4	125.7
1987	407,967	0.64	0.49	3.40	0.69	130.5	100.0	693.5	140.7
1988	418,333	0.64	0.49	3.40	0.69	133.9	102.5	711.2	144.3
1989	615,875	0.64	0.49	1.46	0.69	197.1	150.9	449.6	212.5
1990	637,689	0.64	0.49	1.46	0.69	204.1	156.2	465.5	220.0
1991	638,934	0.64	0.49	1.46	0.69	204.5	156.5	466.4	220.4
1992	657,259	0.64	0.49	1.46	0.69	210.3	161.0	479.8	226.8
1993	668,709	0.54	0.42	1.46	0.69	180.6	140.4	488.2	230.7
1994	672,773	0.54	0.42	1.46	0.69	181.6	141.3	491.1	232.1
1995	663,694	0.54	0.42	1.46	0.69	179.2	139.4	484.5	229.0
1996	674,595	0.54	0.42	1.46	0.69	182.1	141.7	492.5	232.7
1997	750,000	0.43	0.33	1.46	0.69	161.3	123.8	547.5	258.8
1998+	850,000	0.43	0.33	1.46	0.69	182.8	140.3	620.5	293.3

In 1988, Keystone applied for a permit to install gas burners in the electric arc furnaces. The IEPA agreed with the proposed project based upon the premise that it would decrease CO emissions. Keystone performed tests in 1988 for CO emissions with and without the burners operating to offer to the IEPA as proof. The CO emission factor in **Table 4** prior to 1989 is based upon the portion of those tests performed while the furnace was operated in an electric-only mode. The particulate emission factors used in this table change after 1992 and after 1996. These changes reflect the improved capture of fugitive emissions resulting from changes made in those years. In 1992, a large portion of the roof monitor was closed off resulting in an

improvement in capture efficiency of the canopy hood from 75% to 83%. In 1996, the canopy hood on electric arc furnace #2 was replaced with a new "penthouse" style hood which captures 90% of the fugitive emissions.

TABLE 5
CONTINUOUS CASTER ACTUAL EMISSIONS

Year	Production (tons/yr)	Emission Factor (lbs/ton)				Annual Emissions (tons/yr)			
		TSP	PM_{10}	CO	NO_x	TSP	PM_{10}	CO	NO_x
1981	215,904	0.0080	0.0048	0.0000	0.0500	0.9	0.5	0.0	5.4
1982	213,616	0.0080	0.0048	0.0000	0.0500	0.9	0.5	0.0	5.3
1983	248,674	0.0080	0.0048	0.0000	0.0500	1.0	0.6	0.0	6.2
1984	290,312	0.0080	0.0048	0.0000	0.0500	1.2	0.7	0.0	7.3
1985	284,440	0.0080	0.0048	0.0000	0.0500	1.1	0.7	0.0	7.1
1986	349,878	0.0080	0.0048	0.0000	0.0500	1.4	0.8	0.0	8.7
1987	381,240	0.0080	0.0048	0.0000	0.0500	1.5	0.9	0.0	9.5
1988	396,300	0.0080	0.0048	0.0000	0.0500	1.6	1.0	0.0	9.9
1989	583,971	0.0080	0.0048	0.0000	0.0500	2.3	1.4	0.0	14.6
1990	609,820	0.0080	0.0048	0.0000	0.0500	2.4	1.5	0.0	15.2
1991	612,648	0.0080	0.0048	0.0000	0.0500	2.5	1.5	0.0	15.3
1992	631,932	0.0080	0.0048	0.0000	0.0500	2.5	1.5	0.0	15.8
1993	643,535	0.0004	0.0003	0.0000	0.0500	0.1	0.1	0.0	16.1
1994	647,083	0.0004	0.0003	0.0000	0.0500	0.1	0.1	0.0	16.2
1995	644,729	0.0004	0.0003	0.0000	0.0500	0.1	0.1	0.0	16.1
1996	653,620	0.0004	0.0003	0.0000	0.0500	0.1	0.1	0.0	16.3
1997	735,000	0.0004	0.0003	0.0000	0.0500	0.1	0.1	0.0	18.4
1998+	833,000	0.0004	0.0003	0.0000	0.0500	0.2	0.1	0.0	20.8

In 1992, a baghouse was added to the Caster building to control the fugitive particulate emissions from the roof. The emission factors shown in **Table 5** reflect the estimates assigned to this modification. There is no evidence to suggest that these emission factors cannot be met.

TABLE 6
ROD MILL REHEAT FURNACE ACTUAL EMISSIONS

Year	Production (tons/yr)	Emission Factor (lbs/ton)				Annual Emissions (tons/yr)			
		TSP	PM_{10}	CO	NO_x	TSP	PM_{10}	CO	NO_x
1981	312,551	0.0090	0.0054	0.0378	0.3456	1.4	0.8	5.9	54.0
1982	283,702	0.0090	0.0054	0.0378	0.3456	1.3	0.8	5.4	49.0
1983	204,921	0.0090	0.0054	0.0378	0.3456	0.9	0.6	3.9	35.4
1984	236,482	0.0090	0.0054	0.0378	0.3456	1.1	0.6	4.5	40.9
1985	239,228	0.0090	0.0054	0.0378	0.3456	1.1	0.6	4.5	41.3
1986	334,409	0.0090	0.0054	0.0378	0.3456	1.5	0.9	6.3	57.8
1987	360,724	0.0090	0.0054	0.0378	0.3456	1.6	1.0	6.8	62.3
1988	360,926	0.0090	0.0054	0.0378	0.3456	1.6	1.0	6.8	62.4
1989	574,731	0.0090	0.0054	0.0378	0.3456	2.6	1.6	10.9	99.3
1990	623,784	0.0090	0.0054	0.0378	0.3456	2.8	1.7	11.8	107.8
1991	643,940	0.0090	0.0054	0.0378	0.3456	2.9	1.7	12.2	111.3
1992	654,558	0.0090	0.0054	0.0378	0.3456	2.9	1.8	12.4	113.1
1993	715,107	0.0090	0.0054	0.0378	0.1971	3.2	1.9	13.5	70.5
1994	713,168	0.0090	0.0054	0.0378	0.1971	3.2	1.9	13.5	70.3
1995	662,272	0.0090	0.0054	0.0378	0.1971	3.0	1.8	12.5	65.3
1996	693,864	0.0090	0.0054	0.0378	0.1971	3.1	1.9	13.1	68.4
1997	800,000	0.0090	0.0054	0.0378	0.1971	3.6	2.2	15.1	78.8
1998+	960,000	0.0090	0.0054	0.0378	0.1971	4.3	2.6	18.1	94.6

The modification indicated between 1992 and 1993 on **Table 6** represents the installation of Low-NO_x burners on the reheat furnace. Actual stack testing has been performed which shows that the NO_x emission factor is realistic.

Table 7 shows the Steel Works's total actual emissions for comparison with the PSD "major modification" thresholds. When assessing actual emissions the baseline is defined as the average rate for the two years prior to the modification, except in cases where the plant has been operating at a reduced level during this two year period. In these cases, a more representative two-year period is used.

TABLE 7
STEEL WORKS TOTAL ACTUAL EMISSIONS

Year	Annual Emissions (tons/yr)			
	TSP	PM_{10}	CO	NO_x
1981	206.7	157.8	1091.5	279.7
1982	167.5	127.9	883.7	232.6
1983	84.5	64.4	442.7	130.7
1984	98.9	75.2	517.6	152.3
1985	95.4	72.7	499.8	148.9
1986	119.5	91.0	625.7	192.2
1987	133.6	101.9	700.3	212.5
1988	137.1	104.5	718.0	216.6
1989	199.4	153.9	460.5	326.4
1990	209.3	159.4	477.3	343.0
1991	209.9	159.7	478.6	347.0
1992	215.7	164.3	492.2	355.7
1993	183.9	142.4	501.7	317.3
1994	184.9	143.3	504.6	318.6
1995	182.3	141.3	497.0	310.4
1996	185.2	143.7	505.6	317.4
1997	165.0	126.1	562.6	355.9
1998+	187.3	143.0	638.6	408.7

At first glance, it would appear from **Table 7** that all of the pollutants except CO increased more than their respective thresholds after the 1988 modifications. However, the only modification done at that time was the installation of gas burners in the electric arc furnaces. The emissions increases shown subsequent to this point in time are due to production increases which were not previously limited by any permit conditions. The capability of higher production levels is evidenced by the production totals for 1981 and 1982. In other words, the emissions increases were not caused by any "modification" to the facilities and are not subject to PSD review.

In order to accurately analyze the emissions increases due to the modifications proposed in 1992, it is necessary to compare the highest actual emissions after that date with the average of the two

years prior. The table shows that the particulate matter emissions actually decreased as a result of the modifications. This is reasonable, since many of the modifications were designed to improve the capture and control of particulate emissions. *The CO and NO_x have increased, but have not yet exceeded the PSD thresholds.* The 1997 production values used in the tables are based upon Lake Engineering's estimates and are equivalent to the production limits expressed in the Phase I permit. In summary, as of this time, the PSD threshold has not been reached due to the limited actual production to date.

The production values used for evaluation of the emissions in the future (1998+) are based upon the limits in the Phase II permit. The table shows that the CO and NO_x emissions will increase more than their respective PSD thresholds if these production levels are achieved. Therefore, it will be necessary to reduce the allowable production limits at the plant to a level below the Phase II production levels in order to avoid exceeding PSD thresholds in the future. Also, the emission factors for CO and NO_X will be reduced after the Phase II modifications are complete. The Phase II modifications include a combustion chamber which has been constructed but was not yet operational during the test. Also, the DEC flange gap will be reduced as part of these modifications. These changes will reduce the emission factors for both of these pollutants below the levels achieved during the recent tests.

New Source Performance Standards (NSPS) {40 CFR 60 Subparts A, AA, AAa}

Background

Keystone currently operates two electric arc furnaces (EAFs). The Arc Shop was commissioned in 1970, which was before the first NSPS Standard for Electric Arc Furnaces became effective. The first standard, Subpart AA applies to EAFs constructed, modified, or reconstructed after October 21, 1974 and before August 17,1983 and the present standard, Subpart AAa, applies to EAFs constructed, modified, or reconstructed after August 7, 1983. Under 40 CFR § 60.14, a modification is defined as "any physical or operational change to an EAF which results in an increase in the hourly emission rate of particulate matter to the atmosphere". Under 40 CFR § 60.14(e), "the following shall not, by themselves, be considered modifications: (1) routine maintenance, repair, or replacement; (2) an increase in particulate emissions that result from changes or improvements that do not require a capital expenditure on the affected facility (EAFs); and (3) the addition or use of an air pollution control system". Under 40 CFR § 60.15 (b), reconstruction is defined as "the replacement of components of an existing facility to such an extent that the fixed capital cost of the components exceeds 50% of the fixed capital costs required to construct a comparable entirely new facility". *At this time neither electric arc furnace is subject to either NSPS standard, Subpart AA or AAa.* In an effort to review the Keystone's NSPS compliance status for the Arc Shop, an examination of several documents, including the list of assets for the Arc Shop, the list of assets for the baghouses (which should contain the dust handling systems) and available air permits, were evaluated.

Compliance Evaluation Technique

The method used to determine the Keystone's NSPS status is described as follows. The Detailed Listing of Fixed Assets (maintained for accounting and tax purposes) was used to

provide a historical list of expenditures and improvements made by Keystone at the Peoria facility. Two specific cost centers were evaluated. These cost centers describe monies spent for the Arc Shop, cost center 6031, and Baghouses, which includes the dust handling equipment, cost center 6034. Each separate cost center was arranged in a table that listed each upgrade by year, a description of the upgrade, a determination as to whether or not that upgrade was a modification and the capital cost associated with the upgrade. These tables are presented in the Appendix. If the upgrade was not part of the regulated facility or affected facility, then this was noted and further consideration of the upgrade was not required. If the upgrade was performed on a regulated facility, an assessment as to whether or not an increase of particulate emissions occurred was made. If an increase of particulate emissions occurred as a result of upgrades to a regulated facility, an analysis as to whether or not the upgrade was made with or without a capital expenditure to the regulated facility was made. "Capital expenditure" is defined in 40 C.F.R. §60.2 as "an expenditure for a physical or operational change to an existing facility which exceeds the product of the applicable "annual asset guideline repair allowance percentage" specified in the later edition of Internal Revenue Service (IRS) Publication 534 and the existing facility's basis, as defined by section 1012 of the Internal Revenue Code." The most recent Publication 534 which contains the annual asset guideline repair allowance percentages is the December 1984 publication. Included in Appendix of this report is a copy of the portion of the December 1984 IRS Publication 534 which lists an annual asset guideline repair allowance percentage of 18% for manufacture of primary steel mill products. If no capital expenditure was made, no modification occurred.

The next step was to determine if "reconstruction" had occurred. Once each improvement was evaluated for "modifications" a second table was developed which classified only improvements to the affected facility by date. Under Subpart AA applicability dates, October 21, 1974 to August 17, 1983, the affected facility was defined as the Arc Furnace and dust handling equipment. Under Subpart AAa applicability dates, from August 17, 1983 to present, the affected facility is defined as the Arc Furnace, transformer, and dust handling equipment. In order to evaluate for reconstruction, the cost of a comparable entirely new facility built at the time the improvement was made must be determined. Using the time frame and corresponding affected facility definition for Subparts AA and AAa, the original book value from the Detailed Listing of Fixed Assets, and the Construction Cost Index for Chicago, Illinois, a value of a comparable new facility at any point in time could be established. For determinations through 1978, the original book value was used as the basis to determine the cost of a comparable new facility. In 1992, an updated value of a new comparable facility was determined as part of an NSPS reconstruction analysis. The 1992 value was adjusted and then used as the benchmark cost for subsequent analysis of reconstruction from 1987 to present. By comparing the accumulated cost of improvements to the affected facility with a comparable new facility at the times when improvements occurred, a reconstruction analysis was made.

Results of NSPS Analysis

"Modifications" Based on analysis of the improvements made to the affected facility there were no modifications made. Many of the improvements made were to ancillary equipment

which was not part of the affected facility. Other improvements to the affected facility did not result in an increase in the particulate matter emission rate. No information was found that would conclude that a modification has occurred.

"Reconstruction" The reconstruction analysis presented a more difficult task as each time a substantial number of improvements were made to the affected facility, an adjusted cost of a comparable entirely new facility had to be determined. As already pointed out, the definition of the affected facility changed from Subpart AA to Subpart AAa and the costs to be evaluated for reconstruction determination have to be accumulated as there is no time limit on the cumulative improvement costs. Major improvements that were evaluated were the dust handling system improvements in 1978 and 1987, oxy-fuel burner system and spray cooled roofs in 1988 and 1990, rebuild of the 75,000 KVA transformer in 1991, new furnace shells and roofs in 1992, dust handling system additions in 1995 and 1996, and a spray cooled roof replacement in 1996. Once again, the cumulative amount spent on the affected facility did not exceed 50% of the cost to construct a comparable entirely new facility. The results of the analysis indicate that reconstruction has not occurred.

Title V - CAAPP {Clean Air Act Amendments of 1990}

Keystone's facilities in Peoria, Illinois are a "major source" as defined by the Title V regulations in 40 CFR Part 70, and as such were required to submit a complete CAAPP application to Illinois EPA within one year after Illinois' program approval. The USEPA granted interim program approval to IEPA on March 7, 1995. Keystone submitted a CAAPP application to IEPA on December 22, 1995. IEPA accepted the application as complete on January 11, 1996. A copy of Keystone's Title V permit application is attached.

New Source Review, modifications {40 CFR 51 Subpart I}

Keystone's Peoria facility is located in an "attainment" area for the criteria pollutants. Therefore, any modification done at the plant has been reviewed for PSD applicability only. A discussion of the plant's compliance status with regard to PSD is included above.

State Implementation Plan (SIP) Regulations {40 CFR 52}

Illinois' State Implementation Plan (SIP) regulations are contained in Title 35, Subtitle B, Chapter I of the State of Illinois Rules and Regulations. The following SIP regulations are applicable to Keystone's Steel Works:

Part 212, Subpart B: Visible Emissions

Section 212.123 Limitations for All Other Sources

This rule limits the visible emissions from all sources in the state to 30 percent opacity except for an allowance for 8 minutes in any 60 minute period of no more than 60 percent opacity with no more than 3 occurrences in any 24 hour period. A certified visible emissions observer from Lake Engineering performed a brief Method 9 evaluation of the Arc Shop roof monitor and baghouse exhaust on March 7, 1997 to determine compliance. The following table shows the results of his observations. The average opacity from each of these sources is less than the limit of 30%.

Emission Source	Opacity
Roof Monitor	0 - 10%
Old Baghouse	5 - 30%
New Baghouse - West Side	5 - 15%
New Baghouse - East Side	5 - 25%

Part 212, Subpart K: Fugitive Particulate Matter
Sections 212.309 & 212.310 Operating Program

These regulations require the control of fugitive dust sources such as storage piles and traffic areas in accordance with an approved operating program. This requirement was restated as a condition of the Arc Shop operating permit. A discussion of the compliance with this requirement is found in the **State Issued Air Permits** section under the **Clean Air Act** heading of this report.

Part 212, Subpart K: Fugitive Particulate Matter
Section 212.316 Emission Limitations for Sources in Certain Areas

This section establishes limits on the visible emissions from slag crushing, storage piles, roadways, and parking areas. The slag crushing operation is currently being performed by a independent contractor under a separate state issued permit and is not addressed in this document. During their visits to the site, Lake Engineering's certified visible emissions evaluator did not observe any fugitive visible emissions in excess of the limits set forth in the rules. Keystone's use of road sweepers on paved roads and parking areas as well as the regular application of chemical surfactants to unpaved roads was sufficient to maintain compliance with this regulation.

Part 212, Subpart L: Particulate Matter Emissions from Process Emission Sources
Section 212.322 Existing Process Sources

This rule limits the particulate matter emissions from all sources in existence prior to September, 1979. For sources which process more than 30 tons/hour of raw materials, the emission limit is calculated using the given formula:

$$E = C + A(P)^B,$$

where:

P = process weight rate in tons/hr
E = allowable emission rate in lb/hr
A = 55.0
B = 0.11
C = -40.0

The compliance of the arc shop to this rule can be evaluated by substituting the process rate of 86.2 tons/hr which occurred during the tests in March, 1997 and comparing the resulting limit to the test results.

E_{limit} = -40.0 + 55.0 (86.2 tons/hr)$^{0.11}$ = 49.8 lb/hr (emission limit)

$E_{baghouse}$ = 24.85 lb/hr (baghouse emissions from test results)

E_{roof} = AP-42 factor for unc. roof emission x process rate x (1- canopy efficiency)

= (1.4 lb/ton) x (86.2 tons/hr) x (1-90%) = 12.07 (roof monitor emission)

E_{total} = 24.85 + 12.07 = 36.92 lb/hr (total arc shop emissions)

Since the total arc shop emissions of 36.92 lb/hr are less than the limit of 49.8 lb/hr, the arc shop is in compliance with Section 212.322.

National Emission Standards for HAP's (asbestos) {40 CFR 61 Subpart M}

Keystone is regulated under 40 CFR 61.145 for the demolition and renovation of areas having asbestos containing materials. Keystone complys with all the requirements of 40 CFR 61.145 in the demolition projects under this regulation. Documentation of asbestos remediation work is recorded and maintained in the Environmental Engineering files.

Conclusion and Resolution

The following is a compliance summary based upon the information presented in the preceding sections:

- Keystone is currently in compliance with the IEPA issued air permits for the Caster and Rod Mill.
- The Arc Shop is out of compliance with the IEPA emission limits for TSP, PM_{10}, CO, and NO_X due to underestimation of emissions in previous applications.
- The Arc Shop, Caster, and Rod Mill were in apparent violation of the IEPA permitted production limits assigned to them prior to the permit amendments in 1992.
- The federal PSD regulations have not been triggered by any of the modifications to Keystone's facilities.
- The electric arc furnaces are not subject to the NSPS regulations promulgated in 40 CFR Part 60 Subpart AA and AAa.
- Keystone has submitted a complete CAAPP permit application to the IEPA as required by 40 CFR Part 70.
- Keystone has discontinued the portion of their fugitive dust control operating program which requires water spray of hot slag at the Arc Shop because of the extreme hazard to human health and worker safety associated with that activity.

The following is a summary of the actions planned by Keystone to resolve the non-compliance issues discovered in this review:

- Keystone will submit a IEPA construction permit application using revised emission estimates for TSP, PM_{10}, CO, and NO_X based upon the results of the emissions tests performed in March, 1997.
- Keystone will submit a revised CAAPP operating permit application including revised emissions estimates based upon these same test results.
- Keystone will submit a revised fugitive dust control operating program to IEPA.
- Keystone will submit a PSD Application for the planned future production increases in the Steel Works once the revised IEPA construction permit is received.

Resource Conservation and Recovery Act

Solid Waste/Hazardous Waste Determinations

Material/Waste	Determination	Determination Source	End Use/Disposition
Arc Shop Dust	K061	{40 CFR § 261.32}	Stabilization, Landfilling by Peoria Disposal Company (PDC)
Caster Baghouse Dust	Non-Hazardous	Waste Characterization Sampling by Peoria Disposal Company	Landfilling by PDC
Rod Mill Floor Sweepings	exempt as steel-making ingredient	{40 CFR § 261.2(e)}	recycle in Electric Arc Furnace
Drop-out Box Material from Fume System	exempt as steel-making ingredient	{40 CFR § 261.2(e)}	recycle in Electric Arc Furnace
Baghouse Bags and Tyvek suits	exempt as steel-making ingredient	{40 CFR § 261.2(e)}	recycle in Electric Arc Furnace
Zinc Skimmings	marketable byproduct	Material is not a solid waste under {40 CFR261.2}	sold to Gulf Reduction, Houston, TX
Zinc Dross	marketable byproduct	Material is not a solid waste under {40 CFR261.2}	sold to Gulf Reduction, Houston, TX
Lead Skimmings	marketable byproduct	Material is not a solid waste under {40 CFR261.2}	sold to Gulf Reduction, Houston, TX
Ferrous Sulfate Heptahydrate Crystals	marketable byproduct	Material is not a solid waste under {40 CFR261.2}	sold to Crown Technologies, Indianapolis, IN
Petroleum Naptha from Parts Washers	D001, D006, D008, D018, D035, D039, D040	Waste Characterization Sampling by Safety-Kleen	manifested to and recycled by Safety-Kleen, Pekin, IL
Petroleum Naptha Sludges from Parts Washers	D008, D018, D039, D040	Waste Characterization Sampling by Safety-Kleen	manifested to and recycled by Safety-Kleen, Pekin, IL
Waste Petroleum Naptha and Distillates (misc. uses)	D001	Material Data Survey by Pollution Control Industries	manifested to Pollution Control Industries, E. Chicago, IN
Waste Latex Paint	Non-hazardous Waste Paint, Solid	Material Data Survey by Pollution Control Industries	manifested to Pollution Control Industries, E. Chicago, IN
Waste Dielectric Solution	D001	Generator Determination based on product knowledge	manifested to Pollution Control Industries, E. Chicago, IN
Waste Kerosene	D001	Material Data Survey by Pollution Control Industries	manifested to Pollution Control Industries, E. Chicago, IN
Waste Paint Related Material	D001, F003, F005	Material Data Survey by Pollution Control Industries	manifested to Pollution Control Industries, E. Chicago, IN

Keystone will have other miscellaneous waste streams occasionally due to construction or demolition projects, off-spec materials, spills, etc. that are not included in the table above. Those

determinations are made as appropriate when these situations arise by waste characterization analyses.

Current Violation Notice and Correspondence

Keystone received Violation Notice L-1996-01181 from the IEPA on January 10, 1997 (see Appendix). Violation Notice L-1996-01181 listed eighteen (18) violations based upon the July 30, 1996 RCRA Inspection conducted by John Tripses-IEPA (see Appendix). Of the 18 violations, three (3) violations Nos. 1, 2, and 17 were related to the Radioactive Mixed Waste Storage Area Closure (presented in further detail below), two (2) violations (Nos. 11 and 12) were related to hazardous waste labeling, storage, and reporting, and the remaining thirteen (13) were related to an acid spill issue.

The enclosed correspondence (see Appendix) between Keystone and the IEPA (listed below) shows that 15 of the 18 violations have been satisfactorily resolved. Keystone awaits the review of the Radioactive Mixed Waste Storage Areas (Closure No. C-754) to resolve any issues still outstanding with the IEPA.

Enclosed Correspondence

Jan. 29, 1997	Keystone's first response to Violation Notice L-1996-01181
Jan. 31, 1997	Keystone's second response toViolation Notice L-1996-01181 (submittal of the corrected 1995 Annual Hazardous Waste Report)
Feb. 13, 1997	IEPA's rejection of Keystone's initial proposed Compliance Commitment Agreement (CCA), and acceptance of the meeting to discuss the violations.
Feb. 25, 1997	Keystone's request to change the meeting time and date.
Feb. 27, 1997	IEPA's acceptance of the new meeting time and date.
Feb. 27, 1997	IEPA's rejection of Keystone's second proposed CCA dated Jan. 31, 1997, and confirmation of the acceptance of the meeting to discuss the violations.
Mar. 27, 1997	Keystone's third response toViolation Notice L-1996-01181, confirming the discussions at the Keystone-IEPA meeting and Keystone's position on the acid spill issue.
Apr. 18, 1997	IEPA's rejection of the Keystone's third response to Violation Notice L-1996-01181. IEPA still considers the Radioactive Mixed Waste Storage Areas (Closure No. C-754) as unresolved, but has accepted Keystone's position on the acid spill issue.

Current Corrective Actions

Ditch Remediation Project (US District Court Consent Decree, Civil Action No. 86-1212, Judge Mihm)

This corrective action has been ongoing since the original Consent Decree signed June 29, 1988. The Retention Reservoir, North Ditch, Mid Mill Ditch, and Dredge Piles have been remediated to date under the approved closure plan. The report from the most recent inspection conducted on July 30, 1996 by John Tripses-IEPA states that "Keystone appears to be complying with the latest court order for the closure of the surface impoundments" (see Appendix). Keystone

believes it is in full compliance with the Consent Order and Consent Decree for the closure of the surface impoundments.

Radioactive Mixed Waste Storage Areas (Cs-137 contam. K061)(Closure No. C-754)
This corrective action was due to an accidental melting of a Cesium-137 source on December 3 or 4, 1992. This incident caused extensive low level radioactive contamination in Keystone's fume collection system and produced over 29,000 cu. ft. of low level radioactive-mixed waste and debris. Keystone was required to conduct closure under the Illinois Department of Nuclear Safety (IDNS) which has primary authority in all radioactive matters over the IEPA. Closure Documentation was submitted to the IDNS on June 30, 1995 and final IDNS closure was granted on August 18, 1995.

As required by the IEPA, Keystone had to also undergo RCRA closure. Keystone submitted the RCRA Closure Plan for the Radioactive Mixed Waste Storage Areas (Closure No. C-754) on June 30, 1995. The closure plan was accepted by the IEPA on September 28, 1995. Closure documentation for this corrective action was submitted to the IEPA on December 23, 1995. No official response has been provided to Keystone on the status of this corrective action review. Keystone received a Violation Notice (L-1996-01181) for this closure on January 10, 1997.

Keystone believes no violation has occurred on the Radioactive Mixed Waste Storage Areas (Closure No. C-754) since all of the RCRA closure criteria have been met and final closure documentation has been submitted. Keystone will address any additional IEPA concerns with the closure and comply with any IEPA directives.

Standards for Hazardous Waste Generators {40 CFR 262 Subparts A, B, C, D, and E}
Keystone is classified as a large quantity generator of hazardous waste (USEPA Generator #ILD000714881). The normal waste streams have been summarized previously under the Solid/Hazardous Waste Determinations Table. All hazardous waste generated at the Peoria facility is stored for less than 90 days and is manifested offsite to permitted TSD facilities. No hazardous waste generated by Keystone is exported. All manifest records are maintained in Keystone's Environmental Engineering Department.

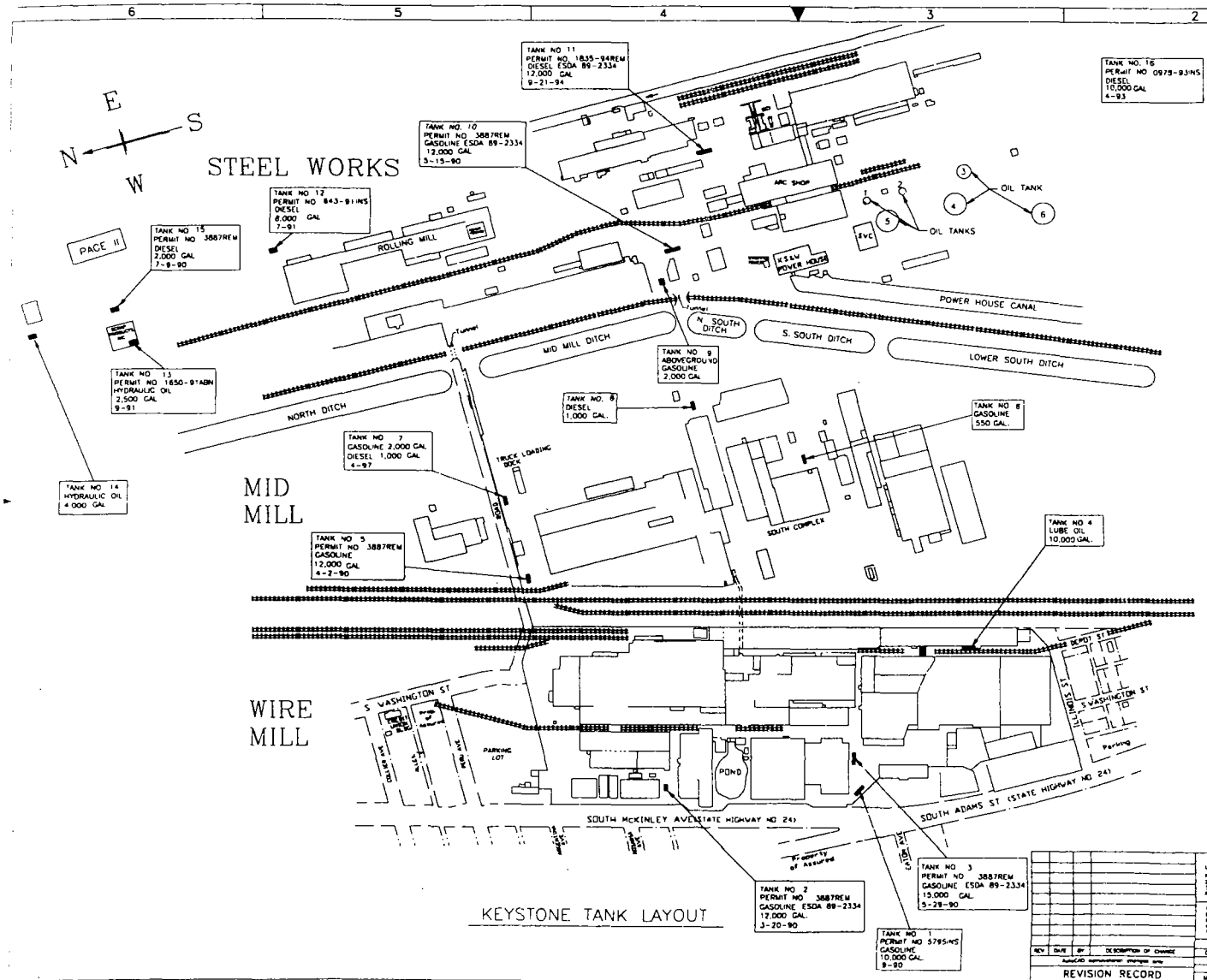
Keystone submits an Annual Hazardous Waste Generation Report to the IEPA (see Appendix for the 1996 Report). Keystone operates currently with the 1993 Hazardous Waste Contingency Plan, however as explained previously, the plan is being updated and incorporated into the Integrated Site Safety and Contingency Plan Program. Keystone believes it is in compliance with 40 CFR 262 Subparts A, B, C, D, and E.

Interim Status for Hazardous Waste Treatment Storage and Disposal Facilities {40 CFR 265}
Keystone is not a RCRA permitted TSD facility. The two corrective actions that subject Keystone to this regulation have been presented previously. Keystone believes it is in full compliance with these corrective action programs and 40 CFR 265.

Land Disposal Restrictions {40 CFR 268 Subpart A}
The hazardous wastes generated by Keystone that have LDR's are identified with each load by the proper "Hard Hammer" notification. These notifications are maintained with the associated manifests in the Environmental Engineering files. Keystone believes it is in full compliance with 40 CFR 268 Subpart A.

Used Oil Management {40 CFR 279}
Keystone recycles used oil through several vendors. Depending on the source of the used oil, it is collected in drums, totes, or tanks until the containers are full, then the used oil vendor is called to make a pickup. The used oil is manifested to the used oil recycling facilities and the manifests are kept in the Environmental Engineering files. Keystone believes it is in full compliance with 40 CFR 279.

Underground Storage Tanks {40 CFR 280}
Keystone operates a series of underground storage tanks (see drawing D-21779). These tanks currently meet the required UST specifications. Keystone believes it is in compliance with 40 CFR 280.



KEYSTONE TANK LAYOUT

LEGEND

TANK NO.	PERMIT NO.	CONTENTS	GALLONS	DATE INSTALLED/REMOVED
1	5795INS	GASOLINE	12,000	9-90
2	3887REM	GASOLINE	12,000	3-20-90
3	3887REM	GASOLINE	15,000	5-29-90
4		LUBE OIL	10,500	
5	3887REM	GASOLINE	12,000	4-2-90
6		GASOLINE	550	
7		GASOLINE DIESEL	2,000 1,000	4-97 4-97
8		DIESEL	1,000	
9		GASOLINE	2,000	
10	3887REM	GASOLINE	12,000	5-15-90
11	1835-94REM	DIESEL	12,000	9-21-94
12	643-91	DIESEL	8,000	7-91
13	1650-91ABN	HYDRAULIC OIL	2,500	9-91
14		HYDRAULIC OIL	4,000	
15	3887REM	DIESEL	2,000	7-9-90
16	0978-93INS	DIESEL	10,000	4-93

REV	DATE	BY	DESCRIPTION OF CHANGE

REVISION RECORD

TOLERANCES UNLESS OTHERWISE SPECIFIED

THIS PRINT IS THE PROPERTY OF KEYSTONE STEEL & WIRE CO. AND MUST NOT BE USED IN ANY MANNER DETRIMENTAL TO THEIR INTEREST

REFERENCE DRGS: D-189-5

MICROFILM DATE

Keystone Steel & Wire

DEPT BARTONVILLE-GENERAL PLANT
EQUIP PLANT EMISSIONS SCHEMATIC
NAME KEYSTONE TANK LAYOUT
DR BWK DATE 3-20-97 ENGR JRS FILE 100
CHKD JRS DATE SCALE n/a SHT 1 OF 1
DO NOT SCALE DIMENSIONS
REPORT ALL CHANGES TO ENGINEERING
DRAWING NUMBER D-21779 REV. 0

Toxic Substances Control Act, Title I

PCB's {40 CFR 761}

Keystone currently uses 13 PCB transformers and 16 PCB contaminated transformers in the internal electrical supply system (see Figures 35 and 36). Keystone maintains 3 years of PCB manifests, certificates of receipt, and certificates of destruction in the Environmental Engineering files. Keystone has maintained the proper records necessary for producing the written annual document log {40 CFR 761.180 (a)(2)} however no formal annual document logs have been produced.

Resolution: Maintain written annual document logs starting with 1996 data and continue to maintain these annual document logs in the future.

KCI BARTONVILLE PCB TRANSFORMERS

29-May-97

TC#	Manufacturer	Serial #	KVA	Primary /Secondary V.	Location	Gallons
39	GE	7532028	602	2300 246	SWITCH HOUSE (BLDG. #78)	600
40	GE	7886093	10	2300 230	SWITCH HOUSE (BLDG. #78)	19
58	GE	H886915	2500	6900 240	SWITCH HOUSE (BLDG. #78)	300
59	GE	H885321	1500	13800 480	DRAW #2A	245
60	GE	G855472B	1500	13800 480	DRAW #2B	245
61	GE	H887562	1500	13800 480	MACH. SHOP SUB	245
62	GE	H887561	1000	13800 480	GALV. SUB	180
108	KUHLMAN	2-958	1667	6900 2300	BLOOMING MILL #2 SUB	504
121	GE	H885644	5000	13800 2400	DUST COLLECTOR	541
125	KUHLMAN	C8265	833	6600 2300	STEAM PLANT	363
126	KUHLMAN	C8263	833	6600 2300	STEAM PLANT	363
127	KUHLMAN	C8264	833	6600 2300	STEAM PLANT	363
145	WESTINGHOUSE	PBV2791-01	1500	13800 480	FENCE SUB	245
					Total Gallons:	**4213**

Figure 35.

KCI BARTONVILLE PCB CONTAMINATED TRANSFORMERS

29-May-97

TC#	Manufacturer	Serial #	KVA	Primary /Secondary V.	Location	PCB in PPM	Gallons
21	KUHLMAN	C59963	230	7200 480	ALUMINIZING	52	196
24	KUHLMAN	D10927	500	7200 240	DRAWING #6	60	211
57	GE	F960802	7500	13800 6900	BLDG 201	188	1155
69	WESTINGHOUSE	PAV1174-01	300	13800 480	METALLURGY LAB	80	185
95	KUHLMAN	2955	333	6600 220	BILLET MILL	116	160
104	KUHLMAN	794329	333	2300 450	BLOOMING MILL SUB #1	51	200
115	GE	B343343	75	2400 240	DEEP WELL FEEDER	73	56
117	GE	B343342	75	2400 240	DEEP WELL FEEDER	78	56
118	GE	D398591-59p	100	7200 240	ROD UNLOADING BLDG.	126	70
119	GE	D398592-59p	100	7200 240	ROD UNLOADING BLDG.	78	70
120	GE	D398593-59p	100	7200 240	ROD UNLOADING BLDG.	123	70
147	GE	G857694	300	13800 480	PUMP HOUSE #1	126	90
148	GE	G857696	750	13800 480	PUMP HOUSE #2	92	140
149	GE	G857695A	500	13800 480	PUMPHOUSE #3	61	110
155	INTERSTATE	89G1642	1000	13800 480	ACID RECOVERY	70	240
159	FERRANTI PACKARD	2-224549	5000		#2 VAULT	58	71
						Total Gallons:	**3080**

Figure 36.

CERCLA

Notices, Penalties (Section 103)

Keystone currently has no Section 103 penalties, notices, or violations. Keystone's barge facility handles only steel scrap, and finished product (rod).

Emergency Planning and Community Right-to-Know Act, Section 313

Arbitration for Small Superfund Cost Recovery Claims {40 CFR 304}
Keystone currently is involved with several Superfund sites which are presented in the Keystone Consolidated Industries, Inc. 1996 Annual Report (see Appendix).

Tier I, Tier II Reporting {40 CFR 370.41, 40 CFR 370.42}
Keystone annually submits Tier II Emergency and Hazardous Chemical Inventory Forms to the Peoria County ESDA. These records are kept in the Environmental Engineering files. Keystone believes it is in compliance with 40 CFR 370.41 and 370.42.

TRI, Right-to-Know {40 CFR 372}
Keystone annually submits the Form "R" or TRI report (see Appendix for the 1996 TRI Report). These reports and the supporting documents are kept in the Environmental Engineering files. Keystone believes it is full compliance with 40 CFR 372.

Clean Water Act

Effluent Limitations {CWA § 301}
Keystone currently operates an industrial wastewater treatment plant that is considered best practical control technology for the type of effluent produced at the Peoria facility.

Water Quality Standards and Implementation {CWA § 303},{40 CFR 131}
The IEPA is the designated authority in Illinois to promulgate and implement water quality standards. Keystone, through the NPDES Permit program in the State of Illinois, complies with all the applicable water quality standards implemented by the IEPA.

Pretreatment Standards {CWA § 307(b)}
No industrial discharge goes to any municipal sewer system at Keystone. All industrial wastewater is treated by Keystone's industrial WWTP. As such, Keystone is not subject to CWA § 307(b).

NPDES Program {CWA § 402},{40 CFR 122-123}
Keystone operates an industrial WWTP and two sludge lagoons under NPDES Permit No. IL0002526. All industrial wastewater and stormwater generated at the Peoria facility is treated at this plant.

Monthly Discharge Monitoring Reports (DMR's) are submitted to the IEPA as required by the NPDES Permit (see Appendix for the April 1997 DMR forms). Daily Analytical Laboratories, Peoria, IL analyzes the WWTP's effluent twice per week for the NPDES Permit parameters (TSS, oil & grease, lead, zinc, iron, NH_3-N, and pH). Three years worth of DMR's and supporting data are kept in the Environmental Engineering files at Keystone. Associated documentation required for obtaining the NPDES Permit is also maintained on file.

John McQuire of USEPA Region V made a surprise inspection of Keystone's Water System in 1996. Mr. McQuire's only comments were to make a modification in the method of sampling for oil and grease and to refrigerate the collection vessel used in the 24-hour composite sampling (which were implemented within 72 hours of Mr. McQuire's inspection). Keystone believes it is in full compliance with the NPDES Program.

SPCC Plan {40 CFR 112}
Keystone has an SPCC Plan dated January 28, 1976 to comply with 40 CFR 112. Most of the operations described by this plan are being updated and incorporated into the Integrated Site Safety and Contingency Plan. Keystone believes it is in compliance with 40 CFR 112.

Quality Assurance for Testing Procedures {40 CFR 136}
Keystone participates in the annual USEPA QA testing program through Daily Analytical Laboratories, Peoria, IL. Daily Analytical Laboratories receives the test solutions directly from the USEPA laboratories, then analyzes and submits to Keystone those results for the NPDES

parameters required in Keystone's permit. Keystone completes the necessary forms and submits them to the IEPA. Keystone maintains these records in the Environmental Engineering files. Keystone believes it is in compliance with 40 CFR 136.

National Oil and Hazardous Substances Contingency Plan {40 CFR 300}
Keystone operates currently with the 1993 Hazardous Waste Contingency Plan, however as explained previously, the 1993 plan is being updated and incorporated into the Integrated Site Safety and Contingency Plan Program. Keystone believes it is in compliance with 40 CFR 300.

Iron & Steel Point Source Category {40 CFR 420}
Keystone is not subject to these requirements as all of Keystones wastewater and stormwater is treated through Keystone's NPDES Permitted WWTP and is not discharged to a publicly owned treatment works.

Metal Finishing Point Source Category {40 CFR 433}
Keystone is not subject to these requirements as all of Keystones wastewater and stormwater is treated through Keystone's NPDES Permitted WWTP and is not discharged to a publicly owned treatment works.

National Primary and Secondary Drinking Water Regulations {40 CFR 141-143}
Keystone has a non-community well water drinking water system that supplies shower facilities, bathrooms, some fire protection, and several process water systems in the Steel Works, Mid Mill, and Wire Mill. The Illinois Department of Public Health (IDPH) has the regulatory authority for the Safe Drinking Water Program in IL and administers the program to Keystone.

Well water at Keystone is not used for drinking water due to the hardness and mineral taste. Bottled water was voluntarily put out in the mills at the employee's request. Keystone still maintains the drinking water program standards for the well water system because the water is still used for showers in the mills.

Keystone maintains the sampling program as prescribed by the IDPH and maintains the sample results and records in the Environmental Engineering files. Keystone believes it is in compliance with 40 CFR 141-143

Injection Wells {40 CFR 144-148}
Keystone does not own or operate any injection wells and is not subject to 40 CFR 144-148.

See Item

R49-310 KEYSTONE STEEL AND WIRE ORGANIZATION CHART DATE 03/28/97

PRESIDENT, KSW GLAISTER, THOMAS

ADMINISTRATIVE ASST MAXWELL, DAWN

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VP, FINANCIAL SERVICES                  CAMPBELL, WILLIAM
    MGR PURCHASING                          HOGUE, CAROLC
        MGR PURCH SYSTEMS                       CARSON, JERRY
            PURCHASING COORD                        HARRIS, CAROL
            PURCHASING COORD                        BRINKER, REBECCA
            PURCHASING COORD                        KEEDY, LOIS
            STORES SYS/SCRAP CLERK                  ROSS, CYNTHIA
        PURCHASING AGENT                        BRASCHE, RYAN
        SR PURCHASING AGENT                     BAHR JR, WILBUR
        SR PURCHASING AGENT                     RIGGENBACH, JAMES
        STOREROOM/SCHED FRM                     SULLIVAN, GERALD
            SR CLERK SM STORE SBU                   CHANEY, MARY
        WM STOREKEEPER                          BEASLEY, KAREN
            SENIOR CLERK SBU                        COLVIN, SANDRA

    MGR MILL ACCOUNTING                     ********
        MGR SM ACCOUNTING                       KIBLER, LISA
            ACCOUNTING ANALYST                      DEAN, GREGORY
            SM ACCOUNTANT                           KENDALL, TONIA
        WIRE MILL COST MGR                      KRAFT, DEBORAH
            COST ANALYST                            KUMER, SARAH
            WM ACCOUNTANT                           BURDESS, GERALD
            WM ACCOUNTANT                           COREMUS, KAREN
            WM ACCOUNTANT                           WHITE, CHERYL
            WM ACCOUNTANT                           MARFELL, AMY

    ASSISTANT CONTROLLER                    OLSON, THOMAS
        SUPV ACCTS PAYABLE                      HOTTELL, JEANNIE
            DATA ENTRY CLERK                        SCHLOSSER, KATHRYN
        ACCOUNTANT                              HELM, BRET
        SR ACCOUNTANT                           KIRKHAM, CHERYL
        FINANCIAL ANALYST                       GIBBS, AMY
        SUPV PAYROLL                            SCOTT, JAMES
            PAYROLL COORDINATOR                     VANKAKEN, BOBBI
            SENIOR CLERK SBU                        WEBBER, DIANE
            SENIOR CLERK SBU                        BENDER, DIANA
            SENIOR CLERK SBU                        LOCKWOOD, RENA
            SENIOR CLERK SBU                        RAINEY, BOBBI
            DATA ENTRY CLERK                        ZIELINSKI, JACQUELINE
            DAY RATE RECORD SBU                     JOHNSON, WILLIAM
        SR ACCOUNTING CLERK                     SHERWOOD, MARY

    MGR CREDIT & COLLECTIONS                KUNKEL JR, HAROLD
        MGR PRICING& INVOICING                  POMPA, NICHOLAS
            PRICING ANALYST                         MOWBRAY, TODD
            PRICING ANALYST                         WATSON, JACQUELINE
            INVOICE CLERK SBU                       VARNES, SUE
            INVOICE CLERK SBU                       MCCOY, CHERRY
            INVOICE CLERK SBU                       CORCTS, CAROLYN
            INVOICE CLERK SBU                       KAUFMAN, DEBORAH
            ORDER ENTRY CLERK SBU                   CONN, TAMMIE
        ACCTS RECEIV COORD                      STOWELL, BRENDA
        COLLECTIONS COORDINATOR                 FOREAKER, TONI

    MGR EDP OPNS & TELEC                    STEARNES, LEON
        DATA PROCESSING SUPV                    ATEN, ROBERT
            COMPUTER OPERATOR                       BAILEY, KARLA
            COMPUTER OPERATOR                       BROOKS, DENNIS
            COMPUTER OPERATOR                       DELICATH, RANDY
            DATA ENTRY OPERATOR                     RUSSELL, CYNTHIA
            DATA ENTRY OPERATOR                     VAN ROSSEM, CHARLOTTE
```

EDP TECH DATA ENTRY WIMMER, NACMI

MGR INFORMATION SVCS	VALENTINE, JAMES
PROGRAMMER ANALYST	********
PC SUPPORT SPECIALIST	EARNEST, YVETTE
PC SUPPORT SPECIALIST	RETTKE, TODD
SR PROGRAMMER/ANALYST	HOTTELL, LEE
SR PROGRAMMER/ANALYST	SPECK, STEVEN
SR BUSINESS ANALYST	LARSEN, CHARLES
LAN ADMINISTRATOR	GOSSETT, KIM

VP,MANUFACTURING ********

GEN MGR, WP HRTV — MONROE JR, JAMES

OPNS MGR,WIRE MILL — BEECHAM, ROBERT

GEN SUPT,IND WIRE MILL — HOWARD, BARRY

GF IND WIRE MILL — DELAROSA, ANNED

AREA FRM WM/MM IND PACK — JESTER, MARION

AREA FRM MM DR MUFFLE — RICHARDSON, BOBBY

AREA FRM CLEANING — SCHAFER, STEPHAN

FRM MM DR & MUFFLE — BOWLIN, ROBERT

GF NAIL — ORRICK, THOMAS

FOREMAN NAIL — SHANE, ROBERT

FOREMAN NAIL — SCARCLIFF, LARRY

FOREMAN NAIL — HOGUE, DONALD

FOREMAN NAIL — MCDONALD, H

FOREMAN NAIL — BEARD, MICHAEL

FOREMAN NAIL — HARMS, STEVEN

FOREMAN NAIL REPAIR — BISHOP, GARY

AREA FRM NAIL — TURNELL, JOHN

GF GALV — MAY, SCOTT

FOREMAN GALV — MAXWELL, SCOTT

FOREMAN GALV — HEATHCOAT, TODD

FOREMAN GALV — MAHER, JOSEPH

FOREMAN GALV — PARRISH, JOHN

FOREMAN GALV — WOOD, MICHAEL

FOREMAN GALV — KLOKKENGA, JEFFREY

GF WIRE MILL PROC — MILLER, DANIEL

FOREMAN LC — ZIEGLER, DANNY

FOREMAN LC — HEITZMAN, TIMOTHY

FOREMAN LC — DUITS, TERRY

FOREMAN LC — WILLKIE, THOMAS

FOREMAN LC — TORTAT, WILLIAM

FOREMAN LC — ZERBONIA, DANIEL

FOREMAN LC — ODUM SR, RUSSELL

FOREMAN LC — STIRNAMAN, BRIAN

AREA FRM LC — CARMACK, CHRIS

AREA FRM LC — HOWARD, LAWRENCE

AREA FRM FABRIC — BERARDI, JOHN

SENIOR CLERK SBU — WHITTEN, BETHANY

GF FIN WM SVC SHIP — MURPHY, GEORGE

FOREMAN FINISHING — MOFFITT, WILLIAM

FOREMAN FINISHING — BAILEY, RICHARD

FOREMAN FINISHING — EADES, WILLIAM

FOREMAN FINISHING — FORD, ROBERT

FOREMAN FINISHING — ELLIS, DAVID

FOREMAN FINISHING — CLARK, ROY

FOREMAN FINISHING — GRAHAM, ROBERT

FOREMAN WM YARD — PARKHURST, LEONARD

SECR, OPNS MGR WM — HEITZMAN, JO ANN

SECR, OPNS MGR WM — BARDWELL, JUDY

GEN MGR PROD & PROC IMPR — MILLER JR, ROBERT

SUPT WM MAINT — ZILCH, JAMES

GF MAINTENANCE — ABERNATHY, RONALD

AREA FRM WM MAINT — SONDAG, ALFRED

FRM BLDG MNT PIPE MW — WOLLAND, KENNETH

FRM WM MAINT — HASTY, LARRY

FRM WM MAINT — HISLOPE, ROBERT

FRM WM MAINT — HALL, JOHN

FRM WM MAINT — COPE, SHAWN

FRM WM MAINT — FINK, MICHAEL

FRM WM MAINT	BREEDLOVE, ALLISON
GF CENT SHOPS/WM STC	WARREN, DONALD
FRM CENTRAL SHOPS	WAAG, MICHAEL
FRM CENTRAL SHOPS	READER, LONNIE
SENIOR ENGINEER	REYSEN, RICHARD
SUPV, SM ENG	HOBSON, KENNETH
DESIGN DRAFTSMAN	MCCLAIN, MICHAEL
ENGINEER	STEINBACH, KYLE
ENGINEER	BAINTER, GREGORY
DESIGN ENGINEER	TORCOFF, STEVEN
DESIGN ENGINEER	EMERY, JAMES
DESIGN ENGINEER	DEBLIECK, TIMOTHY
DESIGN ENGINEER	PRICE, MICHAEL
DESIGN ENGINEER	GROSS, ROBERT
DESIGN ENGINEER	KOSEY, KARL
DESIGN ENGINEER	WINN, BRIAN
DESIGN ENGINEER	HEINSMAN, TODD
BLUEPRINT/RECORDS CL	********
DRAFTSMAN S3U	ASH, CHARLES
SUPV ELECT ENG	********
ENGINEER	ANGLIN, GEORGE
ENGINEER	THREW, TIMOTHY
ENGINEER	BROWN, TROY
DESIGN ENGINEER	ARNETT, BARRY
DESIGN ENGINEER	********
MGR ENERGY & ENV ENG	BENNINGTON, DALE
DESIGN ENGINEER	SEMELROTH, DAVID
DESIGN ENGINEER	SKELLEY, JOHN
OPNS MGR, STEEL MILL	EDWARDS, DAVID
SUPT SM MTL CONTROL	STRANZ, ROGER
FRM SCRAP YARD TRANS	BARDWELL, SCOTT
FRM SCRAP YARD TRANS	EUBANK, WAYNE
FRM SCRAP YARD TRANS	PETERS, WILLIAM
RLF FRM MAT HANDLING	EVANS, JAMES
MGR SCRAP PROC, INC	DONAHUE JR, JAMES
PRODUCTION SUPV	EVANS, TERRANCE
WEIGHMASTER/PAYROLL	LEVERENZ, JUDITH
SECRETARY/ACCTG	LANE, JUDY
PROD REPORTING COORD	RINDFLEISCH, GAYLE
RAIL SCALE WEIGHMASTER	WILLIAMS, AARON
SUPT SM MAINTENANCE	WOODEN, GREGORY
MELT AREA PLANNER	FLAIRTY, DAVID
MECH FRM RW/CR REP/PS	********
RLF FRM SM ELEC	********
RLF FRM SM MECH	KELLEY, ROBERT
YARD FRM SM MAINT	********
FRM ASSIGNED STEAM PLT	BELLINGER, GARY
PM COORDINATOR	********
TURN FRM SM MAINT	WELSH, JEFFERY
TURN FRM SM MAINT	GIFFHORN, GEORGE
TURN FRM SM MAINT	********
FRM SM ELEC SHOP	CARTON, DENNIS
GF MELT AREA MTCE	BARDWELL, WILLIAM
FRM ASSIGNED BAG HSE	********
FRM SM ASSIGNED MECH	LANGLEY III, ALBERT
FRM SM ASSIGNED MECH	DEWITT, THOMAS
FRM SM ASSIGNED ELEC	JAY, RICHARD
FRM SM ASSIGNED ELEC	EBERLY, ERIC
FRM MASONS	RIGGENBACH, LARRY
GF ROD MILL MTCE	NUNN, EDWARD
FRM SM ASSIGNED ELEC	TALAB, JAMES
FRM SM ASSIGNED MECH	SWENCR, JOEL
FRM SM ASSIGNED MECH	********
CLERK SM MAINT	STOCGEL, SANDRA
SUPT MELT SHOP	COBURN, MALCOLM
GF CASTER	SOMMERS, RICHARD
FRM CASTER	TAYLOR, JAMES

	FRM CASTER	CULLINS, VERNON
	FRM CASTER	KIRCHER, HENRY
	FRM CASTER	BUSH, JIM
GF MELTING		********
	FRM MELTING	WOOLSEY JR, ROBERT
	FRM MELTING	HOLMES, RANDY
	FRM MELTING	KALUSA, FRANK
	FRM MELTING	WALDROP, JOEL
	RELIEF FRM SM OPNS	MACVEAN, JOHN
SUPT,ROD MILL		FOSTER, DANIEL
GF,ROD MILL		GOODMAN, JOHN
	FRM ROD MILL	HARMISON JR, DON
	FRM ROD MILL	LAWSON, LLOYD
	FRM ROD MILL	GALL, RICKY
	FRM ROD MILL	BYARD, EARL
	FRM ROD MILL	HUMPHREY JR, JOHN
	FRM ROLL & BEARING	CUTTARER, DENNIS
GF ROD SHIPPING/FINISHING		POTTER, ROGER
	SUPV SHIP/PROD SCHED	PRIEPOT III, JOHN
	AREA FRM MTL HANDLING	BARNETT, THOMAS
	FRM FINISHING/SHIPPING	NORTHRUP, JAMES
	FRM FINISHING/SHIPPING	HARLIN, ROBERT
	FRM FINISHING/SHIPPING	ZEVNIK, TODD
	FRM FINISHING/SHIPPING	WILLMERT, JASON
SECR, OPNS MGR SM		MORROW, SHARON
SUPT PROD PLG & FG WHSE		CLYATT, JEROME
MGR LOGISTICS SVCS		SCOTT, JOHN
GF FIN GOODS WHSE		WILSON, EDWARD
	CYCLE COUNTER	BELL, STEVEN
	FOREMAN FG WHSE	SELBERG, BRENT
	FOREMAN FG WHSE	RAKOSNIK, BRUCE
	FIN GOODS WHSE COORD	CAMP, KEVIN
SUPV PHYS DISTR		BELKERS, ELMER
	TRANSP EXPEDITOR	SMALLEY, ERNEST
	IND WIRE COORD	SIDELL, ROBERT
	PHYS DISTR COORD	BLINCH, MICHAEL
	SR TRUCK SCALE CLK	STRUBHAR, MICHAEL
PRODUCTION PLANNER		EMHOFF, SHELLEY
WM SCHED GALV/FIN		METZ, SHIRLEY
SCHEDULER NAIL		PETRANY, STEPHEN
WM SCHED LOW CARBON		MARTIN, KENNETH
SCHEDULER, PROD PLG		READER, VICKI
BAR CODE COORDINATOR		HAND, MICHAEL
INVENTORY CONTROL COORD		KETCHMARK, WILLIAM

GEN MGR, FASTENERS CLETTI, MARK

SALES MGR, FASTENERS HENNINGSEN, KIRK

GEN SLS MGR,RODS,I&C	VICARY JR, JOHN
NATL FIELD SLS MGR I&C	LITTELL, WILLIAM
SR FIELD SLS REP I&C	NICOL, STEVEN
SR FIELD SLS REP I&C	ZIMMERMAN, DON
SR FIELD SLS REP I&C	KNIGHT, ROBERT
SR FIELD SLS REP I&C	OTTENHOFF, DANIEL
NATL ACCTS MGR RODS,I&C	MEYER, JOHN
CUSTOMER SERV REP I&C	LEWIS-HILL, LINDA
CUSTOMER SERV REP I&C	DRCHAN, KATHLEEN
SALES REP SM	SWAN, RICKEY
PRODUCT MGR/IND WIRE	KAMP, JOSEPH

GEN SALES MGR WIRE	CLOYC, RICHARD
MAJOR ACCOUNTS MGR	NELSON, ROBERT
CLAIMS ADMINISTRATOR	BOERS, SHIRLEY
CUSTOMER SERVICE REP	SMITH, PENNY
CUSTOMER SERVICE REP	WOOLSEY, CURTIS
CUSTOMER SERVICE REP	MCCARTY, JED
CUSTOMER SERVICE REP	LAMBIE, VICKI
CUSTOMER SERVICE REP	MCDGLIN, ERIN
CUSTOMER SERVICE REP	SEARLE, VICKI
CUSTOMER SERVICE REP	MERRIMAN, WILLIAM
NATL FIELD SALES MGR	CUPPLES, CLYDE
SR FIELD SLS REP WIRE	RUMSEY, NORMAN
SR FIELD SLS REP WIRE	VEST, DAVID
SR FIELD SLS REP WIRE	TANNER, HERBERT
SR FIELD SLS REP WIRE	FLEMING, JACK
SR FIELD SLS REP WIRE	QUAST, CHARLES
SR FIELD SLS REP WIRE	MATHAY, WALTER
MGR MARKET & ADV WIRE	CHRISTMAS, ROBERT
PROGRAM SUPPORT MGR	THOMPSON, CRAIG
EXEC SECR SALES	HUGHES, DONNA

DIR MET & TECH SVCS	CAVISCN, RALPH
QUAL ASSUR ANALYST	MINGUS, WALTER
QUAL ASSUR ANALYST	FREEMAN, ALBERT
QUAL ASSUR ANALYST	WALDROP, KENNETH
QUAL ASSUR ANALYST	HOYER, ERIC
QUAL ASSUR ANALYST	ZOCK, CHARLES
QUAL ASSUR ANALYST	PARKIN, CHRIS
QA TECHNICIAN	PARRISH, STEVEN
QA TECHNICIAN	RAY, MICHAEL
PROCESS MET SW	SAVOIE, MICHAEL
A/S CASTER OBSERVER	ROBBINS, CALE
A/S CASTER OBSERVER	GLADSCN, THOMAS
A/S CASTER OBSERVER	PETERS, KURTIS
A/S CASTER OBSERVER	PATTCN, EDDIE
ARC SHOP CHEMIST	KNAPP, JOHN
PROCESS MET SW	VINCENT, JAMES
SUPV WM TEST & INSP	RILEY, CHARLES

SYST PROJ MGR ENTERPRISE	TJADEN, GERALD
SECRETARY, SYSTEMS	DICKERSON, KAREN
SR SYSTEMS PROGRAMMER	BOYLAN, MICHAEL
MRP II PHASE LEADER-OPNS	DAVIS, BILLY
MRP II PHASE LEADER-MAINT	TOMETICH, JAMES
MRP II PHASE LEADER-FIN	QUIN, ROGER
MRP II PHASE LEADER-COM	DUNCAN, RONDA

3.24.89

DIRECTOR, IND RELATIONS — ZIEGELE, JON

- ADMINISTRATIVE ASST — LAUTERBACH, GENEVIEVE
- MGR IND ENG — MATTHEWS, ERNEST
  - INDUSTRIAL ENG — BUSSCNE, MICHAEL
  - INDUSTRIAL ENG — ADAMS, YOLANDA
  - SR INDUSTRIAL ENG — SCOTTI, GREGORY
- MGR INS & OFFICE SVC — LINDSAY, GARY
  - PRESSMAN I SBU — ZILLICN, JCSEPH
  - MGR PLANT PROTECTION — WALKER, STEPHEN
  - UTILITY CLERK/MESSGR SBU — GUYTCN, SUE
  - UTILITY CLERK — CHURCHILL, SHARCN
  - OFFICE SERV COORD — HENRY, DEBCRAH
  - HEAD FILE CLERK — KING, HELEN
  - MEDICAL CLAIMS COORD — BIRKEL, PAMELA
  - UTILITY SECRETARY — HEATCN, CINDY
  - SENIOR CLERK SBU — JCHNSCN, RCY
  - SENIOR CLERK SBU — WILLIAMS, JOHN
- DIR LABOR RELATIONS — STIRNAMAN, CHARLES
  - MGR SAFETY & HEALTH — HARPER, COUGLAS
    - INDUSTRIAL HYGIENIST — JOSEPH, GEE
    - SAFETY/HEALTH SPEC — COATS, THCMAS
    - SAFETY COORDINATCR — KLISE, MARINA
    - SR SAFETY & HLTH SPEC — COLLIER, CEDRIC
    - AUDIO TECH/INC HYGIENE — HANLEY, NCRMA
  - MGR WORK COMP/MED CTR — SPRINGER, KENNETH
    - LEAD NURSE — JCHNSCN, JANE
      - INDUSTRIAL NURSE — HESS, RHCCA
      - INDUSTRIAL NURSE — SUNDERLANC, LCIS
      - INDUSTRIAL NURSE — CLEMCNS, DARLENE
  - SECRETARY — HOERR, MARILYN
  - SECRETARY — CRCWDER, SHIRLEY
- MGR PERSONNEL SVCS — MILLER, CAVID
  - SUPV, PERS SVCS — VAN ANTWERP, CHERYL
    - PERSONNEL COORD — HEARN, SUSAN
    - CORP BENEFITS CCORD — MORSE, JENNIFER
  - MGP, EMPLOYMENT — RICHARCS, RCNALC

John R. Skelley 2-12-96

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director
217/782-2113

P. O. Box 19506, Springfield, IL 62794-9506

CONSTRUCTION PERMIT

PERMITTEE

Keystone Steel & Wire Company
Attn: John R. Skelley
7000 S.W. Adams Street
Peoria, Illinois 61641-0002

Application No.: 95090226 I.D. No.: 143808AAA
Applicant's Designation: Date Received: September 26, 1995
Subject: EAF Shop-Control Modification Phase II
Date Issued: February 7, 1996
Location: 7000 S.W. Adams Street, Peoria

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of baghouse hoppers modification, add two new air/oxi/fuel burners per furnace, enlarge DEC ducting, install water-cooled duct and a peak shaver in the DEC system, install a dropout box/combustion chamber in the DEC system, canopy enlargement to increase capture, install an additional baghouse (400,000 CFM) for the enlarged canopy heads as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1a. Operation and emissions attributable to the operation of the Electric Arc Furnace (EAF) during Phase II production level (106 tons/hr; 850,000 tons/yr) shall not exceed the following:

Pollutant	Emission Factor (Lb/Ton)	Emissions (Lb/Hr)	Emissions (T/Yr)
Particulate Matter (TSP)	0.183	19.44	77.80
Particulate Matter (PM_{10})	0.110	11.68	46.80
Nitrogen Oxides (NO_x)	0.15	15.94	63.80
Carbon Monoxide (CO)	0.18	19.12	76.50
Volatile Organic Compounds (VOC)	0.13	13.81	55.25

These limits are based on annual steel production (850,000 tons/year), hours of operation (8,000 hours/year) and the emission factors indicated in the permit application.

b. Compliance with annual limits shall be determined from a running total of 12 months of data.

c. Appropriate operating records shall be maintained to allow the Agency to review compliance with the limits in 1a.

2. Simultaneous operation of two electric arc furnaces is not allowed during Phase II level production years. The Permittee will submit a detailed construction permit application for simultaneous operation of the furnaces.

3a. Prior to making application for an operating permit, the emissions of PM, PM_{10}, NO_x and CO from the electric arc furnaces shall be measured by an approved testing service, during conditions which are representative of maximum emissions.

b. The following methods and procedures shall be used for testing of emissions, unless another method is approved by the Agency: Refer to 40 CFR 60, Appendix A and 40 CFR 61, Appendix B for USEPA test methods.

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Flue Gas Weight	USEPA Method 3
Moisture	USEPA Method 4
Particulate Matter	USEPA Method 5
Carbon Monoxide	USEPA Method 10
Nitrogen Oxides	USEPA Method 7

4. At least 30 days prior to the actual date of testing a written test plan shall be submitted to the Agency for review and approval. This plan shall describe the specific procedures for testing, including as a minimum:

a. The person(s) who will be performing sampling and analysis and their experience with similar tests.

b. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined.

c. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.

d. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods.

e. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification.

f. Any proposed use of an alternative test method, with detailed justification.

g. The format and content of the Source Test Report

5a. The Agency shall be notified prior to these tests to enable the Agency to observe these tests. Notification for the expected date of testing shall be submitted a minimum of thirty (30) days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of five (5) working days prior to the actual date of the test. The Agency may at its

discretion accept notifications with shorter advance notice provided that the Agency will not accept such notifications if it interferes with the Agency's ability to observe testing.

Illinois Environmental Protection Agency
Division of Air Pollution Control - Regional Office
5415 North University
Peoria, Illinois 61614

Illinois Environmental Protection Agency
Attn: Source Emission Test Specialist
Division of Air Pollution Control
1701 First Avenue
Maywood, Illinois 60153

b. Three (3) copies of the Final Report(s) for these tests shall be submitted to the Agency within 14 days after the test results are compiled and finalized, prior to or accompanying the operating permit application. Satisfactory completion of these tests and compliance with the limitations of this permit shall be a prerequisite to the issuance of an operating permit.

c. A copy of the Summary of Results, General Information, and Conclusions, as contained in the Final Report, shall also be submitted to the Source Emission Test Specialist.

6. This permit is issued based on this project not constituting a major modification subject to the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21. The changes in emissions associated with this project are summarized in a Table-I attached with this permit.

If you have any questions on this, please call Mangu Patel at 217/782-2113.

Donald E. Sutton

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:MJP:jar

cc: Region 2

TABLE I

EMISSIONS SUMMARY

Annual Production Levels (Tons)				Total Project Related Emissions (Tons/Year)											
				TSP		P M 10		N O x		S O 2		C O		V O C	
Year	EAF	Caster	Rod Mill	Emissions	Incrmnt to Base	Emissions	Incrmnt to Base	Emissions	Incrmnt to Base	Emissions	Incrmnt to Base	Emissions	Incrmnt to Base	Emissions	Incrmnt to Base
Base	604,800	493,920	635,040	101.4	----	61.9	----	167.5	----	0.21	----	66.4	--	75.6	----
Phase I	750,000	735,000	960,000	71.5	-29.9	44.6	-17.9	169.3	1.8	0.32	0.12	86.3	19.88	48.8	-26.85
Phase II	850,000	833,000	960,000	80.6	-20.7	49.6	-12.4	179.2	11.7	0.32	0.12	95.3	28.88	55.3	-20.35
Phase III	1,225,000	1,225,000	1,016,000	117.5	16.1	71.8	9.9	204.3	36.9	0.34	0.13	132.4	65.97	81.3	5.65

MJP:jar

Keystone Steel & Wire

REVISED: 10-21-1996

~~June 28, 1996~~

EPRCA REPORTING CENTER
P.O. BOX 3348
MERRIFIELD, VA. 22116-3348

ATTN : TOXIC CHEMICAL RELEASE INVENTORY

RE: CY 1995 TOXIC CHEMICAL RELEASE INVENTORY,
FORM R, SECTION 313, RULE 40CFR PART 372

"REVISED added Manganese Compound Revisions to TRI as result of a "NOTICE OF TECHNICAL ERROR dated Oct 11, 1996-copy enclosed."

Dear Administrator :

"REVISED" ~~ADDITION~~
Enclosed is a revised Form R for Manganese Compounds
Enclosed is a copy of the "Notice of Technical Error"

Enclosed are completed Form R reports for the following chemicals used in excess of 10,000 lbs. per year. Specifically, these are as follows:

~~Hydrochloric Acid~~
~~Sulfuric Acid~~
~~Lead Compounds~~
Manganese Compounds
~~Zinc Compounds~~

Release of Methyl Chloroform is not reported for CY 95 since we converted to a water based degreaser in 1993.

Sincerely,

Dale L. Bennington, P.E.
Manager , Energy and
Environmental Engineering

DLB: drs
Enclosure(s)

Cc:

J. Goodner (IEPA)

U.S. Environmental Protection Agency
Office of Prevention, Pesticides and Toxic Substances
Office of Pollution Prevention and Toxics
Information Management Division

DALE L. BENNINGTON
KEYSTONE STEEL & WIRE CO.
7000 S.W. ADAMS ST.
PEORIA, IL 61641

10/11/96

TRI ID #: 61641-KYSTN-7000S
Reporting Year: 1995

TOXIC RELEASE INVENTORY (TRI)

NOTICE OF TECHNICAL ERROR

The attached reports identify errors in your TRI Form R /Alternate Threshold Certification Statement (submissions). These errors should be corrected in order for your data to be accurately represented to the public.

To correct the errors identified in the attachments, follow the guidelines for voluntary revisions outlined in the TRI Reporting Form R and Instructions. When making the corrections on magnetic media, please resubmit ONLY for the chemical(s) being corrected. Within 21 days of receipt of this Notice, please mail the revision - be sure it is a complete signed submission to:

The EPCRA Reporting Center
P.O. Box 3348
Merrifield, VA 22116-3348
Attn: TRI NOTE

You must also send a copy of your corrected submission and a copy of this Notice to the same State organization to which you sent a copy of your original report. EPA recommends that Government-Owned Contractor-Operated (GOCO) facilities send copies of their corrections to their associated Federal facilities.

For a copy of the TRI reporting instructions, or to ask questions about correcting the errors identified in this Notice, call the Emergency Planning and Community Right-to-Know (EPCRA) Hotline at:

(800) 535-0202 (toll free, outside the D.C. Metro area)
(800) 553-7672 (TDD #)
(703) 412-9877 (D.C. Metro and Northern Virginia area)

Thank you for your cooperation in this matter.

/s/ Ruby N. Boyd

Ruby N. Boyd, Acting Chief
Toxic Release Inventory
Information Management Branch (7407)

Attachment(s)

REC'D 10/21/96

N O T I C E O F T E C H N I C A L E R R O R

TRIF-ID: 61641KYSTN7000S
DCN: 13-95-09504181-0-IL
10/11/96

KEYSTONE STEEL & WIRE CO.
7[illegible] S.W. ADAMS ST.
PEORIA, IL 61641

CAS NUMBER/CATEGORY CODE: N450 - -
CHEMICAL/CATEGORY NAME: MANGANESE COMPOUNDS

PART II, SECTION 6.2.C
TYPE OF WASTE TREATMENT/DISPOSAL/RECYCLING/ENERGY RECOVERY
VALUE: * WASTE TREATMENT BLANK OR INVALID CODE *
ERROR: YOU DID NOT CORRECTLY COMPLETE PART II, SECTION 6.2, COLUMN C, "TYPE OF TREATMENT/DISPOSAL/ETC." FOR EACH OFF-SITE TRANSFER, YOU MUST ENTER THE TREATMENT, RECYCLING, ENERGY RECOVERY, OR DISPOSAL CODE FOR THE METHOD USED. SEE THE FORM R INSTRUCTIONS FOR VALID CODES.

PART II, SECTION 8.8
QUANTITY RELEASED TO THE ENVIRONMENT AS A RESULT OF REMEDIAL ACTIONS, ETC.
VALUE: * NO DATA IN SECTION II.8.8 *
ERROR: YOU DID NOT CORRECTLY COMPLETE PART II, SECTION 8.8, "QUANTITY RELEASED AS A RESULT OF REMEDIAL ACTIONS, CATASTROPHIC EVENTS, OR ONE-TIME EVENTS NOT ASSOCIATED WITH PRODUCTION PROCESSES." EITHER ENTER AN ESTIMATE OR "NA" AS APPROPRIATE.

(added "0" in 8.8 on page 9) DB 10/21/96

(Added "M72" code in 6.2.C for Peoria Disposal Landfill #1. on page 6) DB 10/21/96

→ DLB File

Keystone Steel & Wire

EPRCA REPORTING CENTER
P.O. BOX 3348
MERRIFIELD, VA. 22116-3348

June 28, 1996

ATTN : TOXIC CHEMICAL RELEASE INVENTORY

RE: CY 1995 TOXIC CHEMICAL RELEASE INVENTORY,
FORM R, SECTION 313, RULE 40CFR PART 372

Dear Administrator :

Enclosed are completed Form R reports for the following chemicals used in excess of 10,000 lbs. per year. Specifically, these are as follows:

Hydrochloric Acid
Sulfuric Acid
Lead Compounds
Manganese Compounds
Zinc Compounds

Release of Methyl Chloroform is not reported for CY 95 since we converted to a water based degreaser in 1993.

Sincerely,

Dale L. Bennington, P.E.
Manager , Energy and
Environmental Engineering

DLB: drs
Enclosure(s)

Cc: B. Beecham
R. End
J. Goodner (IEPA)
B. Miller
V. Stirnaman
D. Edwards

Keystone Steel & Wire Co. 7000 S.W. Adams St. Peoria, IL 61641-0002 (309) 697-7020 FAX (309) 697-7422

also known as Title III of the Superfund Amendments and Reauthorization Act

MANGANESE COMPOUNDS

WHERE TO SEND COMPLETED FORMS:	1. EPCRA Reporting Center P.O. Box 3348 Merrifield, VA 22116-3348 ATTN: TOXIC CHEMICAL RELEASE INVENTORY	2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)	Enter "X" here if this is a revision	

IMPORTANT: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

For EPA use only

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR	SECTION 2. TRADE SECRET INFORMATION	
	2.1	Are you claiming the toxic chemical identified on page 3 trade secret? ☐ Yes (Answer question 2.2; Attach substantiation forms) ☒ No (Do not answer 2.2; Go to Section 3)
19 95	2.2	If yes in 2.1, is this copy: ☐ Sanitized ☐ Unsanitized

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official

DALE L. BENNINGTON, MANAGER-ENERGY & ENVIRONMENTAL ENGINEERING

Signature: Dale Bennington

Date Signed: 10/21/96

SECTION 4. FACILITY IDENTIFICATION

4.1		
Facility or Establishment Name	KEYSTONE STEEL & WIRE CO.	TRI Facility ID Number: 61641KYSTN7000S
Street Address	7000 S.W. ADAMS ST.	
City	PEORIA	County: PEORIA
State	ILLINOIS	Zip Code: 61641
Mailing Address (if different from street address)		PUT LABEL HERE
City		
State	Zip Code	

EPA Form 9350-1 (Rev. 12/94) - Previous editions are obsolete.

6/26/96

EPA
United States Environmental Protection Agency

EPA FORM R

PART I. FACILITY IDENTIFICATION INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Toxic Chemical, Category, or Generic Name: MANGANESE COMPOUNDS

SECTION 4. FACILITY IDENTIFICATION (Continued)

4.2	This report contains information for: (Important: check a or b; check c if applicable)	a. ☒ An entire facility	b. ☐ Part of a facility	c. ☐ A Federal facility			
4.3	Technical Contact	Name: DALE L. BENNINGTON				Telephone Number (include area code): (309) 697-7552	
4.4	Public Contact	Name: VIC STIRNAMAN				Telephone Number (include area code): (309) 697-7512	
4.5	SIC Code (4-digit)	a. 3312	b. 3315	c. NA	d.	e.	f.
4.6	Latitude and Longitude	Latitude			Longitude		
		Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
		40	38	00	89	39	00

4.7	Dun & Bradstreet Number(s) (9 digits)	a. 10-219-5377
		b. NA
4.8	EPA Identification Number(s) (RCRA I.D. No.) (12 characters)	a. ILD000714881
		b. NA
4.9	Facility NPDES Permit Number(s) (9 characters)	a. IL0002526
		b. NA
4.10	Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)	a. NA
		b. NA

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of Parent Company	☐ NA KEYSTONE CONSOLIDATED INDUSTRIES, INC.
5.2	Parent Company's Dun & Bradstreet Number	☐ NA (9 digits) 00-512-9309

6/28/6

EPA
United States Environmental Protection Agency

EPA FORM R

PART II. CHEMICAL-SPECIFIC INFORMATION

TRI FACILITY ID NUMBER
61641KYSTN7000S
Toxic Chemical, Category, or Generic Name
MANGANESE COMPOUNDS

SECTION 1. TOXIC CHEMICAL IDENTITY

(Important: DO NOT complete this section if you complete Section 2 below.)

1.1	CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.)
	N 450
1.2	Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.)
	MANGANESE COMPOUNDS
1.3	Generic Chemical Name (Important: Complete only if Part I, Section 2.1 is checked "yes." Generic Name must be structurally descriptive.)

SECTION 2. MIXTURE COMPONENT IDENTITY

(Important: DO NOT complete this section if you complete Section 1 above.)

2.1	Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers,letters, spaces, and punctuation.)

SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY

(Important: Check all that apply.)

3.1	Manufacture the toxic chemical:	a. [X] Produce b. [ ] Import	If produce or import: c. [ ] For on-site use/processing d. [ ] For sale/distribution e. [ ] As a byproduct f. [X] As an impurity IN EAF DUST
3.2	Process the toxic chemical:	a. [ ] As a reactant b. [ ] As a formulation component	c. [ ] As an article component d. [ ] Repackaging
3.3	Otherwise use the toxic chemical:	a. [ ] As a chemical processing aid b. [ ] As a manufacturing aid	c. [ ] Ancillary or other use

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

4.1	06 (Enter two-digit code from instruction package.)	

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United States Environmental Protection Agency

EPA FORM R

PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER: 61641KYSTN7000

Toxic Chemical, Category, or Generic Name: MANGANESE COMPOUN

SECTION 5. RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

			A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwat
5.1	Fugitive or non-point air emissions	☐ NA	6,400	0	
5.2	Stack or point air emissions	☒ NA	NA	NA	
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
5.3.1	Stream or Water Body Name: NA		NA		
5.3.2	Stream or Water Body Name: NA				
5.3.3	Stream or Water Body Name: NA				
5.4	Underground injections on-site	☒ NA			
5.5	Releases to land on-site				
5.5.1	Landfill	☒ NA			
5.5.2	Land treatment/ application farming	☒ NA			
5.5.3	Surface impoundment	☒ NA			
5.5.4	Other disposal	☒ NA			

☐ Check here only if additional Section 5.3 information is provided on page 5 of this form

Range Codes: A = 1 - 10 pounds; B = 11 - 499 pounds; C = 500 - 999 po

6/29/95

EPA
United States Environmental Protection Agency

EPA FORM R

PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
61641KYSTN7000S
Toxic Chemical, Category, or Generic Name
MANGANESE COMPOUNDS

SECTION 5.3 ADDITIONAL INFORMATION ON RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

5.3	Discharges to receiving streams or water bodies (enter one name per box)	A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.3.__	Stream or Water Body Name	NA		
5.3.__	Stream or Water Body Name			
5.3.__	Stream or Water Body Name			

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTW)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1 Total Transfers (pounds/year) (enter range code or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B POTW Name and Location Information

6.1.B.__ POTW Name		6.1.B.__ POTW Name	
Street Address		Street Address	
City	County	City	County
State	Zip Code	State	Zip Code

additional pages of Part II, Sections 5.3 and/or 6.1 are attached, indicate the total number of pages in this box [ ] and indicate which Part II, Sections 5.3/6.1 page this is, here. [ ]
(example: 1, 2, 3, etc.)

Range Codes: A = 1 - 10 pounds; B = 11 - 499 pounds; C = 500 - 999 pounds.

REV 10/21/96

EPA

United States Environmental Protection Agency

EPA FORM R

PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Toxic Chemical, Category, or Generic Name: MANGANESE COMPOUNDS

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2. Off-site EPA Identification Number (RCRA ID No.): ILD 000805812

Off-Site Location Name: PEORIA DISPOSAL LANDFILL #1

Street Address: 4349 SOUTHPORT ROAD

City: PEORIA County: PEORIA

State: IL Zip Code: 61615 Is location under control of reporting facility or parent company? ☐ Yes ☒ No

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 556 400	1.	1. M 72
2.	2.	2. M
3.	3.	3. M
4.	4.	4. M

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2. Off-site EPA Identification Number (RCRA ID No.): UTD 982598898

Off-Site Location Name: ENVIROCARE OF UTAH

Street Address: 75 MILE WEST OF SALT LAKE CITY, OFF I-80

City: CLIVE County: TOOELE

State: UTAH Zip Code: 84101 Is location under control of reporting facility or parent company? ☐ Yes ☐ No

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 20,800	1. O	1. M 72
2.	2.	2. M
3.	3.	3. M
4.	4.	4. M

If additional pages of Part II, Section 6.2 are attached, indicate the total number of pages in this box ☐ and indicate which Part II, Section 6.2 page this is, here. ☐ (example: 1, 2, 3, etc.)

Range Codes: A = 1 - 10 pounds; B = 11 - 499 pounds; C = 500 - 999 pounds.

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PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
61641KYSTN7000S
Toxic Chemical, Category, or Generic Name
MANGANESE COMPOUNDS.

SECTION 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY

☒ Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]	c. Range of Influent Concentration	d. Waste Treatment Efficiency Estimate	e. Based on Operating Data?
7A.1a	7A.1b 1 [ ] 2 [ ] 3 [ ] 4 [ ] 5 [ ] 6 [ ] 7 [ ] 8 [ ]	7A.1c	7A.1d %	7A.1e Yes [ ] No [ ]
7A.2a	7A.2b 1 [ ] 2 [ ] 3 [ ] 4 [ ] 5 [ ] 6 [ ] 7 [ ] 8 [ ]	7A.2c	7A.2d %	7A.2e Yes [ ] No [ ]
7A.3a	7A.3b 1 [ ] 2 [ ] 3 [ ] 4 [ ] 5 [ ] 6 [ ] 7 [ ] 8 [ ]	7A.3c	7A.3d %	7A.3e Yes [ ] No [ ]
7A.4a	7A.4b 1 [ ] 2 [ ] 3 [ ] 4 [ ] 5 [ ] 6 [ ] 7 [ ] 8 [ ]	7A.4c	7A.4d %	7A.4e Yes [ ] No [ ]
7A.5a	7A.5b 1 [ ] 2 [ ] 3 [ ] 4 [ ] 5 [ ] 6 [ ] 7 [ ] 8 [ ]	7A.5c	7A.5d %	7A.5e Yes [ ] No [ ]

If additional copies of page 7 are attached, indicate the total number of pages in this box [ ] and indicate which page 7 this is, here. [ ] (example: 1, 2, 3, etc.)

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PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER: 61641KYSTN700C

Toxic Chemical, Category, or Generic N: MANGANESE COMPOUN

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

☒ Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ] 4 [ ]

SECTION 7C. ON-SITE RECYCLING PROCESSES

☒ Not Applicable (NA) - Check here if no on-site recycling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ] 4 [ ] 5 [ ]

6 [ ] 7 [ ] 8 [ ] 9 [ ] 10 [ ]

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PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Chemical, Category, or Generic Name: MANGANESE COMPOUNDS.

SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

All quantity estimates can be reported using up to two significant figures.		Column A Prior Year (pounds/year)	Column B Current Reporting Year (pounds/year)	Column C Following Year (pounds/year)	Column D Second Following Year (pounds/year)
8.1	Quantity released *	6,500	6,400	6,400	6,400
8.2	Quantity used for energy recovery on-site	NA	→	→	→
8.3	Quantity used for energy recovery off-site		NA	NA	NA
8.4	Quantity recycled on-site				
8.5	Quantity recycled off-site				
8.6	Quantity treated on-site				
8.7	Quantity treated off-site				
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)	1,0			
8.9	Production ratio or activity index	1.1			

8.10	Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" in Section 8.10.1 and answer Section 8.11.			
	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.

8.11	Is additional optional information on source reduction, recycling, or pollution control activities included with this report? (Check one box)	YES ☐	NO ☒

* Report releases pursuant to EPCRA Section 329(8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated on-site or off-site.

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FORM R TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Toxic Chemical, Category, or Generic Name: HYDROCHLORIC ACID

WHERE TO SEND COMPLETED FORMS:
1. EPCRA Reporting Center, P.O. Box 3348, Merrifield, VA 22116-3348, ATTN: TOXIC CHEMICAL RELEASE INVENTORY
2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

Enter "X" here if this is a revision: [ ]

IMPORTANT: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

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PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR: 19 95

SECTION 2. TRADE SECRET INFORMATION

2.1 Are you claiming the toxic chemical identified on page 3 trade secret?
[ ] Yes (Answer question 2.2; Attach substantiation forms)
[X] No (Do not answer 2.2; Go to Section 3)

2.2 If yes in 2.1, is this copy: [ ] Sanitized [ ] Unsanitized

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official: DALE L. BENNINGTON, MANAGER-ENERGY & ENVIRONMENTAL ENGINEERING

Signature: Dale L. Bennington

Date Signed: JUNE 28, 1996

SECTION 4. FACILITY IDENTIFICATION

4.1

Facility or Establishment Name: KEYSTONE STEEL & WIRE CO.

TRI Facility ID Number: 61641KYSTN7000S

Street Address: 7000 S.W. ADAMS ST.

City: PEORIA

County: PEORIA

State: ILLINOIS

Zip Code: 61641

Mailing Address (if different from street address):

City:

State:

Zip Code:

PUT LABEL HERE

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PART I. FACILITY IDENTIFICATION INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
61641KYSTN7000S
Toxic Chemical, Category, or Generic Name
HYDROCHLORIC ACID

SECTION 4. FACILITY IDENTIFICATION (Continued)

4.2	This report contains information for: (Important: check a or b; check c if applicable)	a. ☒ An entire facility	b. ☐ Part of a facility	c. ☐ A Federal facility			
4.3	Technical Contact	Name: DALE L. BENNINGTON			Telephone Number (include area code): (309) 697-7552		
4.4	Public Contact	Name: VIC STIRNAMAN			Telephone Number (include area code): (309) 697-7512		
4.5	SIC Code (4-digit)	a. 3312	b. 3315	c. NA	d.	e.	f.
4.6	Latitude and Longitude	Latitude			Longitude		
		Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
		40	38	00	89	39	00
4.7	Dun & Bradstreet Number(s) (9 digits)	a. 10-219-5377					
		b. NA					
4.8	EPA Identification Number(s) (RCRA I.D. No.) (12 characters)	a. ILD000714881					
		b. NA					
4.9	Facility NPDES Permit Number(s) (9 characters)	a. IL0002526					
		b. NA					
4.10	Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)	a. NA					
		b. NA					

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of Parent Company	☐ NA KEYSTONE CONSOLIDATED INDUSTRIES, INC.
5.2	Parent Company's Dun & Bradstreet Number	☐ NA (9 digits) 00-512-9309

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PART II. CHEMICAL-SPECIFIC INFORMATION

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Toxic Chemical, Category, or Generic Name: HYDROCHLORIC ACID

SECTION 1. TOXIC CHEMICAL IDENTITY (Important: DO NOT complete this section if you complete Section 2 below.)

1.1	CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.)
	7647-01-0
1.2	Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.)
	HYDROCHLORIC ACID
1.3	Generic Chemical Name (Important: Complete **only** if Part I, Section 2.1 is checked "yes." Generic Name must be structurally descriptive.)

SECTION 2. MIXTURE COMPONENT IDENTITY (Important: DO NOT complete this section if you complete Section 1 above.)

2.1	Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers, letters, spaces, and punctuation.)

SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY (Important: Check all that apply.)

3.1	Manufacture the toxic chemical:	a. ☐ Produce b. ☐ Import	If produce or import: c. ☐ For on-site use/processing d. ☐ For sale/distribution e. ☐ As a byproduct f. ☐ As an impurity
3.2	Process the toxic chemical:	a. ☐ As a reactant b. ☐ As a formulation component	c. ☐ As an article component d. ☐ Repackaging
3.3	Otherwise use the toxic chemical:	a. ☐ As a chemical processing aid b. ☒ As a manufacturing aid	c. ☐ Ancillary or other use

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

4.1	05 (Enter two-digit code from instruction package.)	

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PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Toxic Chemical, Category, or Generic Name: HYDROCHLORIC ACID

SECTION 5. RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

			A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Fugitive or non-point air emissions (3,630,000# ÷ 9.67#/g x 305#/g x 25g)	☐ NA	286,000	O	
5.2	Stack or point air emissions	☒ NA			
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
5.3.1	Stream or Water Body Name: ILLINOIS RIVER		O	M	O
5.3.2	Stream or Water Body Name: NA		NA	NA	NA
5.3.3	Stream or Water Body Name: NA		NA	NA	NA
5.4	Underground injections on-site	☒ NA			
5.5	Releases to land on-site				
5.5.1	Landfill	☒ NA			
5.5.2	Land treatment/ application farming	☒ NA			
5.5.3	Surface impoundment	☒ NA			
5.5.4	Other disposal	☒ NA			

☐ Check here only if additional Section 5.3 information is provided on page 5 of this form.

Range Codes: A = 1 - 10 pounds; B = 11 - 499 pounds; C = 500 - 999 pounds

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PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Toxic Chemical, Category, or Generic Name: HYDROCHLORIC ACID

SECTION 5.3 ADDITIONAL INFORMATION ON RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

5.3	Discharges to receiving streams or water bodies (enter one name per box)	A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.3.__	Stream or Water Body Name	NA		
5.3.__	Stream or Water Body Name	NA		
5.3.__	Stream or Water Body Name	NA		

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTW)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1 Total Transfers (pounds/year) (enter range code or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	NA

6.1.B POTW Name and Location Information

6.1.B.__ POTW Name	NA	6.1.B.__ POTW Name	NA
Street Address		Street Address	
City	County	City	County
State	Zip Code	State	Zip Code

If additional pages of Part II, Sections 5.3 and/or 6.1 are attached, indicate the total number of pages in this box [ ] and indicate which Part II, Sections 5.3/6.1 page this is, here. [ ]
(example: 1, 2, 3, etc.)

Range Codes: A = 1 - 10 pounds; B = 11 - 499 pounds; C = 500 - 999 pounds.

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PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Toxic Chemical, Category, or Generic Name: HYDROCHLORIC ACID

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2. Off-site EPA Identification Number (RCRA ID No.): NA

Off-Site Location Name:

Street Address:

City: County:

State: Zip Code: Is location under control of reporting facility or parent company? ☐ Yes ☐ No

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. NA	1.	1. M
2.	2.	2. M
3.	3.	3. M
4.	4.	4. M

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2. Off-site EPA Identification Number (RCRA ID No.): NA

Off-Site Location Name:

Street Address:

City: County:

State: Zip Code: Is location under control of reporting facility or parent company? ☐ Yes ☐ No

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1.	1.	1. M
2.	2.	2. M
3.	3.	3. M
	4.	4. M

If additional pages of Part II, Section 6.2 are attached, indicate the total number of pages in this box ☐ and indicate which Part II, Section 6.2 page this is, here. ☐ (example: 1, 2, 3, etc.)

Range Codes: A = 1 - 10 pounds; B = 11 - 499 pounds; C = 500 - 999 pounds.

6-28-96

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PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Toxic Chemical, Category, or Generic Name: HYDROCHLORIC ACID

SECTION 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY

☐ Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.

General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]	c. Range of Influent Concentration	d. Waste Treatment Efficiency Estimate	e. Based on Operating Data?
7A.1a	7A.1b 1: C11 2: NA	7A.1c	7A.1d	7A.1e
W	3: 4: 5: 6: 7: 8:	2	100 %	Yes ☒ No ☐
7A.2a	7A.2b 1: 2:	7A.2c	7A.2d	7A.2e
NA	3: 4: 5: 6: 7: 8:		%	Yes ☐ No ☐
7A.3a	7A.3b 1: 2:	7A.3c	7A.3d	7A.3e
	3: 4: 5: 6: 7: 8:		%	Yes ☐ No ☐
7A.4a	7A.4b 1: 2:	7A.4c	7A.4d	7A.4e
	3: 4: 5: 6: 7: 8:		%	Yes ☐ No ☐
7A.5a	7A.5b 1: 2:	7A.5c	7A.5d	7A.5e
	3: 4: 5: 6: 7: 8:		%	Yes ☐ No ☐

If additional copies of page 7 are attached, indicate the total number of pages in this box ☐ and indicate which page 7 this is, here. ☐ (example: 1, 2, 3, etc.)

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PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Toxic Chemical, Category, or Generic Name: HYDROCHLORIC ACID

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

☒ Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [enter 3-character code(s)]

1 ☐ 2 ☐ 3 ☐ 4 ☐

SECTION 7C. ON-SITE RECYCLING PROCESSES

☒ Not Applicable (NA) - Check here if no on-site recycling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [enter 3-character code(s)]

1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐

6 ☐ 7 ☐ 8 ☐ 9 ☐ 10 ☐

6-28-96

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PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
61641KYSTN7000S
Chemical, Category, or Generic Name
HYDROCHLORIC ACID

SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

All quantity estimates can be reported using up to two significant figures.		Column A Prior Year (pounds/year)	Column B Current Reporting Year (pounds/year)	Column C Following Year (pounds/year)	Column D Second Following Year (pounds/year)
8.1	Quantity released *	355,000	286000	286000	286,000
8.2	Quantity used for energy recovery on-site	0	0	0	0
8.3	Quantity used for energy recovery off-site				
8.4	Quantity recycled on-site				
8.5	Quantity recycled off-site				
8.6	Quantity treated on-site				
8.7	Quantity treated off-site	0	0	0	0
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)	0			
8.9	Production ratio or activity index	0.9			

8.10 Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" in Section 8.10.1 and answer Section 8.11.

	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.

		YES	NO
8.11	Is additional optional information on source reduction, recycling, or pollution control activities included with this report? (Check one box)	☐	☒

* Report releases pursuant to EPCRA Section 329(8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated on-site or off-site.

6-28-96

(IMPORTANT: Type or print; read instructions before completing form)

Form Approved OMB Number: 2070-0093
Approval Expires: 11/92

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FORM R TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Toxic Chemical, Category, or Generic Name: SULFURIC ACID

WHERE TO SEND COMPLETED FORMS:
1. EPCRA Reporting Center, P.O. Box 3348, Merrifield, VA 22116-3348, ATTN: TOXIC CHEMICAL RELEASE INVENTORY
2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

Enter "X" here if this is a revision: [ ]

For EPA use only

IMPORTANT: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR: 19 95

SECTION 2. TRADE SECRET INFORMATION

2.1 Are you claiming the toxic chemical identified on page 3 trade secret?
[ ] Yes (Answer question 2.2; Attach substantiation forms)
[X] No (Do not answer 2.2; Go to Section 3)

2.2 If yes in 2.1, is this copy: [ ] Sanitized [ ] Unsanitized

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official: DALE L. BENNINGTON, MANAGER-ENERGY & ENVIRONMENTAL ENGINEERING

Signature: Dale L. Bennington

Date Signed: JUNE 28, 1996

SECTION 4. FACILITY IDENTIFICATION

4.1

Facility or Establishment Name	KEYSTONE STEEL & WIRE Co.
TRI Facility ID Number	61641KYSTN7000S
Street Address	7000 S.W. ADAMS ST.
City	PEORIA
County	PEORIA
State	ILLINOIS
Zip Code	61641
Mailing Address (if different from street address)	
City	
State	
Zip Code	

PUT LABEL HERE

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PART I. FACILITY IDENTIFICATION INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
61641KYSTN7000S
Toxic Chemical, Category, or Generic Name
SULFURIC ACID

SECTION 4. FACILITY IDENTIFICATION (Continued)

4.2	This report contains information for: (Important: check a or b; check c if applicable)	a. ☒ An entire facility	b. ☐ Part of a facility	c. ☐ A Federal facility			
4.3	Technical Contact	Name: DALE L. BENNINGTON			Telephone Number (include area code): (309) 697-7552		
4.4	Public Contact	Name: VIC STIRNAMAN			Telephone Number (include area code): (309) 697-7512		
4.5	SIC Code (4-digit)	a. 3312	b. 3315	c. NA	d.	e.	f.
4.6	Latitude and Longitude	Latitude			Longitude		
		Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
		40	38	00	89	39	00

4.7	Dun & Bradstreet Number(s) (9 digits)	a. 10-219-5377
		b. NA
4.8	EPA Identification Number(s) (RCRA I.D. No.) (12 characters)	a. ILD000714881
		b. NA
4.9	Facility NPDES Permit Number(s) (9 characters)	a. IL0002526
		b. NA
4.10	Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)	a. NA
		b. NA

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of Parent Company	☐ NA KEYSTONE CONSOLIDATED INDUSTRIES, INC.
5.2	Parent Company's Dun & Bradstreet Number	☐ NA (9 digits) 00-512-9309

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United States Environmental Protection Agency

EPA FORM R

PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
61641KYSTN7000S
Toxic Chemical, Category, or Generic Name
SULFURIC ACID

SECTION 5.3 ADDITIONAL INFORMATION ON RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

5.3	Discharges to receiving streams or water bodies (enter one name per box)	A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.3.__	Stream or Water Body Name	NA	NA	NA
5.3.__	Stream or Water Body Name	↓	↓	↓
5.3.__	Stream or Water Body Name	↓	↓	↓

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTW)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1 Total Transfers (pounds/year) (enter range code or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	NA

6.1.B POTW Name and Location Information

6.1.B.__ POTW Name	6.1.B.__ POTW Name
NA	NA
Street Address	Street Address
City / County	City / County
State / Zip Code	State / Zip Code

If additional pages of Part II, Sections 5.3 and/or 6.1 are attached, indicate the total number of pages in this box [ ] and indicate which Part II, Sections 5.3/6.1 page this is, here. [ ]
(example: 1, 2, 3, etc.)

Range Codes: A = 1 - 10 pounds; B = 11 - 499 pounds; C = 500 - 999 pounds.

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PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Toxic Chemical, Category, or Generic Name: SULFURIC ACID

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2. Off-site EPA Identification Number (RCRA ID No.): NA

Off-Site Location Name:

Street Address:

City: County:

State: Zip Code: Is location under control of reporting facility or parent company? ☐ Yes ☐ No

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. NA	1.	1. M
2.	2.	2. M
3.	3.	3. M
4.	4.	4. M

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2. Off-site EPA Identification Number (RCRA ID No.): NA

Off-Site Location Name:

Street Address:

City: County:

State: Zip Code: Is location under control of reporting facility or parent company? ☐ Yes ☐ No

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. NA	1.	1. M
2.	2.	2. M
3.	3.	3. M
	4.	4. M

If additional pages of Part II, Section 6.2 are attached, indicate the total number of pages in this box ☐ and indicate which Part II, Section 6.2 page this is, here. ☐ (example: 1, 2, 3, etc.)

Range Codes: A = 1 - 10 pounds; B = 11 - 499 pounds; C = 500 - 999 pounds.

6-28-96

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PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Toxic Chemical, Category, or Generic Name: SULFURIC ACID

SECTION 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY

☐ Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]	c. Range of Influent Concentration	d. Waste Treatment Efficiency Estimate	e. Based on Operating Data?
7A.1a	7A.1b 1: C11 2: 3: 4: 5: 6: 7: 8:	7A.1c	7A.1d	7A.1e
W		2	100 %	Yes ☒ No ☐
7A.2a	7A.2b 1: 2: 3: NA 4: 5: 6: 7: 8:	7A.2c	7A.2d	7A.2e
NA			%	Yes ☐ No ☐
7A.3a	7A.3b 1: 2: 3: 4: 5: 6: 7: 8:	7A.3c	7A.3d	7A.3e
			%	Yes ☐ No ☐
7A.4a	7A.4b 1: 2: 3: 4: 5: 6: 7: 8:	7A.4c	7A.4d	7A.4e
			%	Yes ☐ No ☐
7A.5a	7A.5b 1: 2: 3: 4: 5: 6: 7: 8:	7A.5c	7A.5d	7A.5e
			%	Yes ☐ No ☐

If additional copies of page 7 are attached, indicate the total number of pages in this box ☐ and indicate which page 7 this is, here. ☐ (example: 1, 2, 3, etc.)

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PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Chemical, Category, or Generic Name: SULFURIC ACID

SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

All quantity estimates can be reported using up to two significant figures.		Column A Prior Year (pounds/year)	Column B Current Reporting Year (pounds/year)	Column C Following Year (pounds/year)	Column D Second Following Year (pounds/year)
8.1	Quantity released *				
8.2	Quantity used for energy recovery on-site				
8.3	Quantity used for energy recovery off-site (20000 gpd x 300 DPYr) 10 #/gx				
8.4	Quantity recycled on-site	6,000,000	6,000,000	6,000,000	6,000,000
8.5	Quantity recycled off-site				
8.6	Quantity treated on-site ACID RINSE 10%	600,000	600,000	600,000	600,000
7	Quantity treated off-site	0	0	0	0

8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)	0
8.9	Production ratio or activity index	1.0

8.10 Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" in Section 8.10.1 and answer Section 8.11.

	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.

		YES	NO
8.11	Is additional optional information on source reduction, recycling, or pollution control activities included with this report? (Check one box)	☐	☒

* Report releases pursuant to EPCRA Section 329(8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated on-site or off-site.

6-28-96

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FORM R TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Toxic Chemical, Category, or Generic Name: LEAD COMPOUNDS

WHERE TO SEND COMPLETED FORMS:
1. EPCRA Reporting Center, P.O. Box 3348, Merrifield, VA 22116-3348, ATTN: TOXIC CHEMICAL RELEASE INVENTORY
2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

Enter "X" here if this is a revision: [ ]

IMPORTANT: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

For EPA use only

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR

19 95

SECTION 2. TRADE SECRET INFORMATION

2.1 Are you claiming the toxic chemical identified on page 3 trade secret?
[ ] Yes (Answer question 2.2; Attach substantiation forms)
[X] No (Do not answer 2.2; Go to Section 3)

2.2 If yes in 2.1, is this copy: [ ] Sanitized [ ] Unsanitized

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official: DALE L. BENNINGTON, MANAGER-ENERGY & ENVIRONMENTAL ENGINEERING

Signature: Dale L. Bennington

Date Signed: JUNE 28, 1996

SECTION 4. FACILITY IDENTIFICATION

4.1

Facility or Establishment Name: KEYSTONE STEEL & WIRE CO.

TRI Facility ID Number: 61641KYSTN7000S

Street Address: 7000 S.W. ADAMS ST.

City: PEORIA

County: PEORIA

State: ILLINOIS

Zip Code: 61641

Mailing Address (if different from street address):

City:

State:

Zip Code:

PUT LABEL HERE

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PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER: 61641KYSTN7000-S

Toxic Chemical, Category, or Generic Name: LEAD COMPOUNDS

SECTION 5. RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

			A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Fugitive or non-point air emissions	☐ NA	4,400	O	
5.2	Stack or point air emissions	☒ NA	NA	NA	
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
5.3.1	Stream or Water Body Name: ILLINOIS RIVER		200	M	NA
5.3.2	Stream or Water Body Name: NA		NA	NA	↓
5.3.3	Stream or Water Body Name: NA		↓	↓	↓
5.4	Underground injections on-site	☒ NA	↓	↓	
5.5	Releases to land on-site				
5.5.1	Landfill	☒ NA	↓	↓	
5.5.2	Land treatment/ application farming	☒ NA	↓	↓	
5.5.3	Historical data ↓ Surface impoundment 28000#/d x 0.4% Pb	☐ NA	41,000#	O	
5.5.4	Other disposal	☒ NA		N/A	

☐ Check here only if additional Section 5.3 information is provided on page 5 of this form.

Range Codes: A = 1 - 10 pounds; B = 11 - 499 pounds; C = 500 - 999 pounds.

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PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Toxic Chemical, Category, or Generic Name: LEAD COMPOUNDS

SECTION 5.3 ADDITIONAL INFORMATION ON RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

5.3	Discharges to receiving streams or water bodies (enter one name per box)	A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.3.__	Stream or Water Body Name	NA		
5.3.__	Stream or Water Body Name			
5.3.__	Stream or Water Body Name			

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTW)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1 Total Transfers (pounds/year) (enter range code or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B POTW Name and Location Information

6.1.B.__ POTW Name		6.1.B.__ POTW Name	
Street Address		Street Address	
City	County	City	County
State	Zip Code	State	Zip Code

If additional pages of Part II, Sections 5.3 and/or 6.1 are attached, indicate the total number of pages in this box [ ] and indicate which Part II, Sections 5.3/6.1 page this is, here. [ ]
(example: 1, 2, 3, etc.)

Range Codes: A = 1 - 10 pounds; B = 11 - 499 pounds; C = 500 - 999 pounds.

6-26-96

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PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Toxic Chemical, Category, or Generic Name: LEAD COMPOUNDS

SECTION 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY

☐ Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]	c. Range of Influent Concentration	d. Waste Treatment Efficiency Estimate	e. Based on Operating Data?
7A.1a	7A.1b 1 [ ] 2 C01	7A.1c	7A.1d	7A.1e
	3 [ ] 4 [ ] 5 [ ] 6 [ ] 7 [ ] 8 [ ]	3	98.3%	Yes [X] No [ ]
7A.2a	7A.2b 1 [ ] 2 [ ]	7A.2c	7A.2d	7A.2e
	3 [ ] 4 [ ] 5 [ ] 6 [ ] 7 [ ] 8 [ ]		%	Yes [ ] No [ ]
7A.3a	7A.3b 1 [ ] 2 [ ]	7A.3c	7A.3d	7A.3e
	3 [ ] 4 [ ] 5 [ ] 6 [ ] 7 [ ] 8 [ ]		%	Yes [ ] No [ ]
7A.4a	7A.4b 1 [ ] 2 [ ]	7A.4c	7A.4d	7A.4e
	3 [ ] 4 [ ] 5 [ ] 6 [ ] 7 [ ] 8 [ ]		%	Yes [ ] No [ ]
7A.5a	7A.5b 1 [ ] 2 [ ]	7A.5c	7A.5d	7A.5e
	3 [ ] 4 [ ] 5 [ ] 6 [ ] 7 [ ] 8 [ ]		%	Yes [ ] No [ ]

If additional copies of page 7 are attached, indicate the total number of pages in this box [ ] and indicate which page 7 this is, here [ ] (example: 1, 2, 3, etc.)

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PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
61641KYSTN7000S
Toxic Chemical, Category, or Generic Name
LEAD COMPOUNDS

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

☒ Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ] 4 [ ]

SECTION 7C. ON-SITE RECYCLING PROCESSES

☐ Not Applicable (NA) - Check here if no on-site recycling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ] 4 [ ] 5 [ ]

6 [ ] 7 [ ] 8 [ ] 9 [ ] 10 [ ]

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PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Chemical, Category, or Generic Name: LEAD COMPOUNDS

SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

All quantity estimates can be reported using up to two significant figures.		Column A Prior Year (pounds/year)	Column B Current Reporting Year (pounds/year)	Column C Following Year (pounds/year)	Column D Second Following Year (pounds/year)
8.1	Quantity released *	4,600	4,400	4,400	4,400
8.2	Quantity used for energy recovery on-site	NA	NA	NA	NA
8.3	Quantity used for energy recovery off-site	↓	↓	↓	↓
8.4	Quantity recycled on-site	↓	↓	↓	↓
8.5	Quantity recycled off-site	↓	↓	↓	↓
8.6	Quantity treated on-site	41,000	41,000	41,000	41,000
	Quantity treated off-site	510,000	534,400	534400	534,400
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)	0			
8.9	Production ratio or activity index	1.1			

8.10 Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" in Section 8.10.1 and answer Section 8.11.

	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.

8.11 Is additional optional information on source reduction, recycling, or pollution control activities included with this report? (Check one box) YES ☐ NO ☒

* Report releases pursuant to EPCRA Section 329(8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated on-site or off-site.

6-28-96

EPA United States Environmental Protection Agency

FORM R TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Toxic Chemical, Category, or Generic Name: MANGANESE COMPOUNDS

WHERE TO SEND COMPLETED FORMS:
1. EPCRA Reporting Center, P.O. Box 3348, Merrifield, VA 22116-3348, ATTN: TOXIC CHEMICAL RELEASE INVENTORY
2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

Enter "X" here if this is a revision: [ ]

For EPA use only

IMPORTANT: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR

19 95

SECTION 2. TRADE SECRET INFORMATION

2.1 Are you claiming the toxic chemical identified on page 3 trade secret?
[ ] Yes (Answer question 2.2; Attach substantiation forms) [X] No (Do not answer 2.2; Go to Section 3)

2.2 If yes in 2.1, is this copy: [ ] Sanitized [ ] Unsanitized

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official: DALE L. BENNINGTON, MANAGER-ENERGY & ENVIRONMENTAL ENGINEERING

Signature: Dale L. Bennington

Date Signed: JUNE 28, 1996

SECTION 4. FACILITY IDENTIFICATION

4.1

Facility or Establishment Name	KEYSTONE STEEL & WIRE CO.
TRI Facility ID Number	61641KYSTN7000S
Street Address	7000 S.W. ADAMS ST.
City	PEORIA
County	PEORIA
State	ILLINOIS
Zip Code	61641
Mailing Address (if different from street address)	
City	
State	
Zip Code	

PUT LABEL HERE

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PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Toxic Chemical, Category, or Generic Name: MANGANESE COMPOUNDS

SECTION 5.3 ADDITIONAL INFORMATION ON RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

5.3	Discharges to receiving streams or water bodies (enter one name per box)	A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.3.__	Stream or Water Body Name	NA		
5.3.__	Stream or Water Body Name			
5.3.__	Stream or Water Body Name			

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTW)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1 Total Transfers (pounds/year) (enter range code or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B POTW Name and Location Information

6.1.B.__ POTW Name		6.1.B.__ POTW Name	
Street Address		Street Address	
City	County	City	County
State	Zip Code	State	Zip Code

additional pages of Part II, Sections 5.3 and/or 6.1 are attached, indicate the total number of pages in this box [ ] and indicate which Part II, Sections 5.3/6.1 page this is, here. [ ]
(example: 1, 2, 3, etc.)

Range Codes: A = 1 - 10 pounds; B = 11 - 499 pounds; C = 500 - 999 pounds.

6-28-96

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PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Toxic Chemical, Category, or Generic Name: MANGANESE COMPOUNDS

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2. Off-site EPA Identification Number (RCRA ID No.): ILD 000805812

Off-Site Location Name: PEORIA DISPOSAL LANDFILL #1

Street Address: 4349 SOUTHPORT ROAD

City: PEORIA County: PEORIA

State: IL Zip Code: 61615 Is location under control of reporting facility or parent company? ☐ Yes ☒ No

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 556 400	1.	1. M
2.	2.	2. M
3.	3.	3. M
	4.	4. M

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS

6.2. Off-site EPA Identification Number (RCRA ID No.): UTD 982598898

Off-Site Location Name: ENVIROCARE OF UTAH

Street Address: 75 MILE WEST OF SALT LAKE CITY, OFF I-80

City: CLIVE County: TOOELE

State: UTAH Zip Code: 84101 Is location under control of reporting facility or parent company? ☐ Yes ☐ No

A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1. 20,800	1. O	1. M 72
2.	2.	2. M
3.	3.	3. M
	4.	4. M

If additional pages of Part II, Section 6.2 are attached, indicate the total number of pages in this box ☐ and indicate which Part II, Section 6.2 page this is, here. ☐ (example: 1, 2, 3, etc.)

Range Codes: A = 1 - 10 pounds; B = 11 - 499 pounds; C = 500 - 999 pounds.

6-28-96

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PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
61641KYSTN7000S
Chemical, Category, or Generic Name
MANGANESE COMPOUNDS.

SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

All quantity estimates can be reported using up to two significant figures.		Column A Prior Year (pounds/year)	Column B Current Reporting Year (pounds/year)	Column C Following Year (pounds/year)	Column D Second Following Year (pounds/year)
8.1	Quantity released *	6,500	6,400	6,400	6,400
8.2	Quantity used for energy recovery on-site	NA	→	→	→
8.3	Quantity used for energy recovery off-site	↓	NA	NA	NA
8.4	Quantity recycled on-site	↓	↓	↓	↓
8.5	Quantity recycled off-site	↓	↓	↓	↓
8.6	Quantity treated on-site	↓	↓	↓	↓
	Quantity treated off-site	↓	↓	↓	↓
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)				
8.9	Production ratio or activity index				1.1

8.10	Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" in Section 8.10.1 and answer Section 8.11.			
	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2	↓	a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.

8.11	Is additional optional information on source reduction, recycling, or pollution control activities included with this report? (Check one box)	YES ☐	NO ☒

* Report releases pursuant to EPCRA Section 329(8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated on-site or off-site.

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FORM R TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Toxic Chemical, Category, or Generic Name: ZINC COMPOUNDS

WHERE TO SEND COMPLETED FORMS:
1. EPCRA Reporting Center, P.O. Box 3348, Merrifield, VA 22116-3348, ATTN: TOXIC CHEMICAL RELEASE INVENTORY
2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

Enter "X" here if this is a revision: [ ]

For EPA use only

IMPORTANT: See instructions to determine when "Not Applicable (NA)" boxes should be checked.

PART I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR: 19 95

SECTION 2. TRADE SECRET INFORMATION

2.1 Are you claiming the toxic chemical identified on page 3 trade secret?
[ ] Yes (Answer question 2.2; Attach substantiation forms) [X] No (Do not answer 2.2; Go to Section 3)

2.2 If yes in 2.1, is this copy: [ ] Sanitized [ ] Unsanitized

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official: DALE L. BENNINGTON, MANAGER-ENERGY & ENVIRONMENTAL ENGINEERING

Signature: Dale L. Bennington

Date Signed: JUNE 28, 1996

SECTION 4. FACILITY IDENTIFICATION

4.1

Facility or Establishment Name: KEYSTONE STEEL & WIRE CO.

TRI Facility ID Number: 61641KYSTN7000S

Street Address: 7000 S.W. ADAMS ST.

City: PEORIA

County: PEORIA

State: ILLINOIS

Zip Code: 61641

Mailing Address (if different from street address):

City:

State:

Zip Code:

PUT LABEL HERE

6/28/96

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PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
61641KYSTN7000S
Toxic Chemical, Category, or Generic Name
ZINC COMPOUNDS

SECTION 5.3 ADDITIONAL INFORMATION ON RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE

5.3	Discharges to receiving streams or water bodies (enter one name per box)	A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.3.__	Stream or Water Body Name	NA		
5.3.__	Stream or Water Body Name			
5.3.__	Stream or Water Body Name			

SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTW)

6.1.A Total Quantity Transferred to POTWs and Basis of Estimate

6.1.A.1 Total Transfers (pounds/year) (enter range code or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA	

6.1.B POTW Name and Location Information

6.1.B.__ POTW Name		6.1.B.__ POTW Name	
Street Address		Street Address	
City	County	City	County
State	Zip Code	State	Zip Code

If additional pages of Part II, Sections 5.3 and/or 6.1 are attached, indicate the total number of pages in this box [ ] and indicate which Part II, Sections 5.3/6.1 page this is, here. [ ]
(example: 1, 2, 3, etc.)

Range Codes: A = 1 - 10 pounds; B = 11 - 499 pounds; C = 500 - 999 pounds.

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PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER
61641KYSTN7000S
Toxic Chemical, Category, or Generic Name
ZINC COMPOUNDS

SECTION 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY

☐ Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.

a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]	c. Range of Influent Concentration	d. Waste Treatment Efficiency Estimate	e. Based on Operating Data?
7A.1a	7A.1b 1: C01 2: 3: 4: 5: 6: 7: 8:	7A.1c	7A.1d	7A.1e
W		3	98.3 %	Yes ☒ No ☐
7A.2a	7A.2b 1: 2: 3: 4: 5: 6: 7: 8:	7A.2c	7A.2d	7A.2e
			%	Yes ☐ No ☐
7A.3a	7A.3b 1: 2: 3: 4: 5: 6: 7: 8:	7A.3c	7A.3d	7A.3e
			%	Yes ☐ No ☐
7A.4a	7A.4b 1: 2: 3: 4: 5: 6: 7: 8:	7A.4c	7A.4d	7A.4e
			%	Yes ☐ No ☐
7A.5a	7A.5b 1: 2: 3: 4: 5: 6: 7: 8:	7A.5c	7A.5d	7A.5e
			%	Yes ☐ No ☐

If additional copies of page 7 are attached, indicate the total number of pages in this box ☐ and indicate which page 7 this is, here. ☐ (example: 1, 2, 3, etc.)

EPA
United States Environmental Protection Agency

EPA FORM R

PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Toxic Chemical, Category, or Generic Name: ZINC COMPOUNDS

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

☒ Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ] 4 [ ]

SECTION 7C. ON-SITE RECYCLING PROCESSES

☒ Not Applicable (NA) - Check here if no on-site recycling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [enter 3-character code(s)]

1 [ ] 2 [ ] 3 [ ] 4 [ ] 5 [ ]

6 [ ] 7 [ ] 8 [ ] 9 [ ] 10 [ ]

EPA
United States Environmental Protection Agency

EPA FORM R

PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER: 61641KYSTN7000S

Chemical, Category, or Generic Name: ZINC COMPOUNDS

SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES

All quantity estimates can be reported using up to two significant figures.		Column A Prior Year (pounds/year)	Column B Current Reporting Year (pounds/year)	Column C Following Year (pounds/year)	Column D Second Following Year (pounds/year)
8.1	Quantity released *	55,680	55,000	55,000	55,000
8.2	Quantity used for energy recovery on-site	NA			
8.3	Quantity used for energy recovery off-site				
8.4	Quantity recycled on-site				
8.5	Quantity recycled off-site				
8.6	Quantity treated on-site	81,760	81,800	81,800	81,800
8.7	Quantity treated off-site	5,099,000	5,344,200	5,344,200	5,344,200
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)	0			
8.9	Production ratio or activity index	1.0			

8.10	Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" in Section 8.10.1 and answer Section 8.11.			
	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)		
8.10.1	NA	a.	b.	c.
8.10.2		a.	b.	c.
8.10.3		a.	b.	c.
8.10.4		a.	b.	c.

8.11	Is additional optional information on source reduction, recycling, or pollution control activities included with this report? (Check one box)	YES ☐	NO ☒

* Report releases pursuant to EPCRA Section 329(8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated on-site or off-site.

6-28-96

(Norm O.

Pls return

Harding Lawson Associates

February 1, 1993

Mr. Karl D. Kosey
Mechanical Design Engineer
Keystone Steel & Wire
7000 S.W. Adams Street
Peoria, Illinois 61641

Re: NO_x Emission Study for a Reheat Furnace

Dear Karl:

Attached please find three (3) copies of the report for a NO_x emission study performed by a stack testing firm (Mostardi-Platt Associates, Inc.) at Keystone Steel & Wire for a Reheat Furnace on January 19, 1993.
The test program described herein was developed by Harding Lawson Associates (HLA) to verify NO_x emission guarantee levels provided by a reheat furnace contractor of the Keystone Steel & Wire Company (Keystone).

This test program consisted of three (3) one-hour tests at a stack outlet location. The test measured the flue gas parameters: NO_x concentrations, CO_2 concentrations, and stack flue gas temperature. Measured reheat furnace parameters included natural gas consumption and material throughput (i.e., number of billets processed) during each one-hour test.

The overall test results demonstrated that the average NO_x concentration at the reheat furnace outlet stack was 97.6 ppmv at an average CO_2 concentration of 7.81 percent. The temperature of the flue gases at the base of the stack was 660°F. This corresponds to an average NO_x emission rate of 0.155 lb/mmBtu.

In addition to this overall performance, HLA calculated the NO_x emissions from the subject reheat furnace at 15-minute intervals on both lb/mmBtu and lb/hr bases. Attached Tables 1, 2, and 3, present the findings of these analyses for all three tests—1, 2, and 3, respectively. As measured in lb/mmBtu, NO_x emissions varied from 0.133 lb/mmBtu to 0.163 lb/mmBtu; while on a lb/hr basis, NO_x emissions varied from 14.01 lb/hr to 23.83 lb/hr. Figure 1 presents a graph of these findings for lb/mmBtu versus natural gas usage, while Figure 2 is a similar plot for lb/hr versus natural gas consumption.

HLA also estimated NO_x emissions on a lb/ton basis for each test. Tables 1, 2, and 3 present this information averaged over one hour (i.e., each test). NO_x emissions varied from 0.151 lb/ton to 0.187 lb/ton, with an average of 0.17 lb/ton value. Since periods shorter than one hour may not be meaningful to the engineering or operational characteristics of the furnace, no attempt was made to estimate these factors for every 15-minute interval.

Engineering and
Environmental Services

One Tower Lane, Suite 1300, Oakbrook Terrace, IL 60181 708/571-2162 Telecopy 708/571-0439
A Subsidiary of Harding Associates • Offices Nationwide

Based on these results, it appears that NO_x emissions from the subject reheat furnace are below the guarantee level of 0.176 lb of NO_x/mmBtu provided by a contractor of Keystone. If you have any questions and/or comments on the attached report, or if we can be of any further service, please do not hesitate to contact us.

Sincerely,

Suresh M. Relwani
Associate Environmental Engineer

Enclosures

cc (w/o encl): Dale Bennington/Keystone
Bob Miller/Keystone
Jeffrey Wentz/HLA

Table 1

Reheat Furnace Stack Test Results: Test 1
Test Date: 1/19/93

Billets produced = 46
Billet dimensions = 5.125 inches (w)
5.125 inches (h)
50 ft (l)
Billet density = 0.2833 lbs/in^3
Production Rate = 102.7 tons/hr

Time	NO_x (ppm)	CO_2 (%)	Avg. NO_x (ppm)	Avg. CO_2 (%)	Gas Use (mcf)	NO_x Emissions		
						lbs/mmBtu	lbs/hr	lbs/ton
1002	87	7.01						
1003	87	7.06						
1004	89	7.09						
1005	90	7.15						
1006	91	7.13						
1007	92	7.13						
1008	92	7.19						
1009	91	7.21						
1010	91	7.21						
1011	93	7.19						
1012	93	7.34						
1013	97	7.43						
1014	98	7.49						
1015	100	7.46						
1018	103	7.54						
10:02 - 10:18 (15 min average)			92.93	7.24	32	0.159	20.397	
1019	101	7.53						
1020	99	7.63						
1021	100	7.66						
1022	104	7.74						
1023	102	7.75						
1024	101	7.77						
1025	100	7.69						
1026	101	7.76						
1027	101	7.83						
1028	104	7.85						

Table 1 (Cont'd.)

Time	NO_x (ppm)	CO_2 (%)	Avg. NO_x (ppm)	Avg. CO_2 (%)	Gas Use (mcf)	NO_x Emissions		
						lbs/mmBtu	lbs/hr	lbs/ton
1029	101	7.83						
1030	104	7.89						
1031	105	7.81						
1032	102	7.80						
1033	103	7.69						
10:19-10:33 (15 min average)			101.87	7.75	32	0.163	20.895	
1034	100	7.58						
1035	98	7.56						
1036	100	7.52						
1037	101	7.51						
1038	102	7.63						
1039	103	7.59						
1040	104	7.53						
1041	104	7.53						
1042	99	7.37						
1043	91	7.29						
1044	91	7.35						
1045	92	7.28						
1046	92	7.27						
1047	89	7.26						
1048	89	7.24						
10:34 - 10:48 (15 min average)			97.00	7.43	34	0.162	22.036	
1049	83	7.19						
1050	78	7.14						
1051	64	6.73						
1052	56	6.66						
1053	58	6.75						
1054	72	7.08						
1055	85	7.48						
1056	85	7.31						
1057	84	7.24						
1058	83	7.26						

Table 1 (Cont'd.)

Time	NO_x (ppm)	CO_2 (%)	Avg. NO_x (ppm)	Avg. CO_2 (%)	Gas Use (mcf)	NO_x Emissions		
						lbs/mmBtu	lbs/hr	lbs/ton
1059	96	7.39						
1100	104	7.55						
1101	109	7.67						
1102	111	7.72						
1103	106	7.64						
10:49 - 11:03 (15 min average)			85.27	7.25	24	0.146	14.012	
10:01 - 11:03 (hourly average)			94.18	7.42	122	0.158	19.230	0.1873

Table 2

Reheat Furnace Stack Test Results: Test 2
Test Date: 1/19/93

Billets produced = 60
Production Rate = 133.9 tons/hr

Time	NO_x (ppm)	CO_2 (%)	Avg. NO_x (ppm)	Avg. CO_2 (%)	Gas Use (mcf)	NO_x Emissions		
						lbs/mmBtu	lbs/hr	lbs/ton
1131	90	7.92						
1132	84	7.85						
1133	85	8.03						
1134	87	8.01						
1135	87	8.05						
1136	89	8.01						
1137	92	7.82						
1138	90	7.78						
1139	86	7.75						
1140	75	7.58						
1141	67	7.39						
1142	65	7.26						
1143	71	7.51						
1144	92	7.95						
10:30 - 11:44 (15 min average)			82.86	7.78	26	0.132	13.755	
1145	96	7.81						
1146	98	7.63						
1147	93	7.64						
1148	104	8.04						
1149	114	8.43						
1150	117	8.61						
1151	115	8.40						
1152	109	8.22						
1153	103	8.10						
1154	105	8.16						
1155	106	8.17						
1156	109	8.27						
1157	111	8.38						
1158	113	8.48						

Table 2 (Cont'd.)

Time	NO_x (ppm)	CO_2 (%)	Avg. NO_x (ppm)	Avg. CO_2 (%)	Gas Use (mcf)	NO_x Emissions		
						lbs/mmBtu	lbs/hr	lbs/ton
1159	107	8.36						
11:45 - 11:59 (15 min average)			106.67	8.18	34	0.162	22.022	
1200	104	8.15						
1201	106	8.01						
1202	111	8.39						
1203	107	8.36						
1204	108	8.46						
1205	106	8.44						
1206	109	8.51						
1207	106	8.39						
1208	102	8.23						
1209	101	8.18						
1210	101	8.26						
1211	102	8.31						
1212	105	8.37						
1213	104	8.47						
1214	108	8.63						
12:00 - 12:14 (15 min average)			105.33	8.34	38	0.157	23.827	
1215	112	8.62						
1216	113	8.77						
1217	112	8.82						
1218	113	8.69						
1219	112	8.67						
1220	110	8.78						
1221	115	8.93						
1222	114	8.91						
1223	114	8.74						
1224	111	8.63						
1225	110	8.68						
1226	113	8.74						
1227	111	8.72						
1228	111	8.82						

Table 2 (Cont'd.)

Time	NO_x (ppm)	CO_2 (%)	Avg. NO_x (ppm)	Avg. CO_2 (%)	Gas Use (mcf)	NO_x Emissions		
						lbs/mmBtu	lbs/hr	lbs/ton
1229	114	8.79						
1230	115	8.86						
12:15 - 12:30 (15 min average)			112.50	8.76	34	0.159	21.687	
11:30 - 12:30 (hourly average)			102.33	8.28	132	0.153	20.252	0.1512

Table 3

Reheat Furnace Stack Test Results: Test 3
Test Date: 1/19/93

Billets produced = 58
Production Rate = 129.5 tons/hr

Time	NO_x (ppm)	CO_2 (%)	Avg. NO_x (ppm)	Avg. CO_2 (%)	Gas Use (mcf)	NO_x Emissions		
						lbs/mmBtu	lbs/hr	lbs/ton
1301	98	7.77						
1302	101	7.81						
1303	97	7.76						
1304	99	7.83						
1305	98	7.89						
1306	96	7.81						
1307	96	7.75						
1308	95	7.73						
1309	97	7.69						
1310	95	7.73						
1311	96	7.79						
1312	98	7.83						
1313	98	7.90						
1314	97	7.83						
13:00 - 13:14 (15 min average)			97.21	7.79	36	0.155	22.303	
1315	97	7.84						
1316	99	7.85						
1317	98	7.84						
1318	100	7.84						
1319	95	7.71						
1320	97	7.65						
1321	96	7.61						
1322	96	7.57						
1323	95	7.53						
1324	97	7.52						
1325	94	7.46						
1326	95	7.46						
1327	93	7.42						
1328	94	7.44						

Table 3 (Cont'd.)

Time	NO_x (ppm)	CO_2 (%)	Avg. NO_x (ppm)	Avg. CO_2 (%)	Gas Use (mcf)	NO_x Emissions		
						lbs/mmBtu	lbs/hr	lbs/ton
1329	94	7.60						
13:15 - 13:29 (15 min average)			96.00	7.62	36	0.156	22.520	
1330	95	7.64						
1331	82	6.85						
1332	73	6.66						
1333	79	7.03						
1334	93	7.69						
1335	101	7.95						
1336	100	7.92						
1337	98	7.89						
1338	98	7.88						
1339	96	7.87						
1340	97	7.88						
1341	97	7.76						
1342	97	7.80						
1343	97	7.79						
1344	98	7.90						
13:30 - 13:44 (15 min average)			93.40	7.63	34	0.152	20.662	
1345	98	7.91						
1346	98	7.94						
1347	99	7.86						
1348	100	7.86						
1349	97	7.83						
1350	99	7.78						
1351	97	7.76						
1352	98	7.76						
1353	97	7.69						
1354	98	7.80						
1355	98	7.85						
1356	99	7.85						
1357	99	7.87						
1358	101	7.90						

Table 3 (Cont'd.)

Time	NO_x (ppm)	CO_2 (%)	Avg. NO_x (ppm)	Avg. CO_2 (%)	Gas Use (mcf)	NO_x Emissions		
						lbs/mmBtu	lbs/hr	lbs/ton
1359	99	7.86						
1400	101	7.87						
13:45 - 14:00 (15 min average)			98.63	7.84	38	0.156	23.753	
13:00 - 14:00 (hourly average)			96.33	7.72	144	0.155	22.305	0.1723

4-06-87

04/06/87

STEEL WORKS PRODUCTION HISTORY (TONS/YEAR OUTPUT)

DESC. Permit #	Electric Fce. # 72090168	Ingot Teeming # 72090166	Soaking Pits # 72090165	Bloom-Scarfer # 05120056	Cont. Caster # 72090167	Rod Mill #1 # 72090163	Rod & Bar Mill #2 # 72090162
FY81	638,612	384,419	300,146	300,146	215,904	129,095	183,456
FY82	516,672	245,699*	203,941*	203,941*	213,616	108,774*	174,928
FY83	258,139	-0-	-0-	-0-	248,674	-0-	204,921
FY84	301,800	-0-	-0-	-0-	290,312	-0-	236,482
FY85	291,377	-0-	-0-	-0-	284,440	-0-	239,228
FY86	364,337	-0-	-0-	-0-	349,878	-0-	334,409
FY87**	305,975	-0-	-0-	-0-	285,930	-0-	270,543

NOTES:

* - Operations discontinued in May, 1982.
** - For 9 months, thru March 1987.
FY - Example: FY82 is July 1, 1981 through June 30, 1982.

DALE BENNINGTON/bmk

STEEL WORKS HIGHLIGHTS
FY 1988

	88-01	88-02	88-03	88-04	88-05	88-06	88-07	88-08	88-09	88-10	88-11	88-12	Y-T-D
VARIANCE $													
PRODUCTIVITY	(48,992)	15,693	(183,418)	(57,866)	(260,835)	(124,309)	(201,647)	(416,974)	(157,805)	372,495	444,933	377,652	(241,123)
QUALITY RELATED	45,341	71,021	33,929	51,169	11,230	(55,120)	(58,240)	(72,854)	(40,661)	(147,613)	(53,151)	(2,186)	(215,513)
LOADING/USAGE	257,822	(276,165)	204,651	(160,053)	342,444	98,583	(273,417)	(524,840)	(236,060)	(286,844)	(254,918)	(468,645)	(1,569,442)
LOADING/PRICE	(23,824)	(63,826)	(9,563)	96,028	168,836	68,722	26,512	58,296	28,944	215,906	218,435	114,571	891,287
SCRAP PRICE	(271,399)	(219,600)	(392,504)	(975,737)	(1,201,171)	(731,632)	(784,201)	(1,076,944)	(1,207,585)	(1,847,459)	(1,148,258)	(1,244,724)	(10,301,206)
RAW MTL. MIX	(24,011)	(12,363)	(35,167)	27,859	15,515	18,941	(28,470)	(25,732)	(82,430)	(112,227)	(52,784)	(57,809)	(377,398)
SPI VS. PURCH MIX	(53,798)	(3,665)	1,405	33,512	34,644	36,234	11,916	(27,582)	11,214	46,462	3,595	(58,136)	43,801
ROD PURCHASE PRICE	(237,581)	(334,673)	(395,826)	(345,910)	(467,077)	(247,769)	(766,650)	(763,911)	(192,732)	(133,579)	(33,619)	(47,189)	(3,966,516)
OTHER	(69,787)	(26,550)	(15,955)	29,737	(42,089)	20,875	183,503	(7,944)	(38,446)	(42,397)	41,958	126,379	86,476
TOTAL VARIANCES	(425,229)	(849,928)	(792,448)	(1,302,061)	(1,398,473)	(924,283)	(1,970,694)	(2,858,485)	(1,906,961)	(1,135,256)	(841,730)	(1,244,087)	(15,649,635)
TONS PRODUCED													
ARC SHOP	43,238	26,679	33,337	41,662	32,996	32,301	28,948	15,436	38,340	45,208	40,013	39,681	418,333
CASTER	41,917	25,543	31,914	39,942	31,616	31,031	27,660	14,431	35,785	42,252	37,355	36,834	396,300
ROD MILL	39,598	23,969	31,993	36,273	29,844	26,938	34,880	660	22,869	42,354	37,337	35,091	360,926
TONS WORKED													
ARC SHOP	95.10	57.56	76.39	91.81	77.00	72.75	66.31	39.13	75.69	83.88	74.31	75.13	885.03
CASTER	95.31	57.25	76.56	91.94	77.00	72.49	66.13	38.88	75.63	84.00	73.56	74.81	883.56
ROD MILL	91.69	53.06	75.88	81.94	72.53	63.88	85.16	21.00	79.06	97.25	76.63	74.56	872.63
TONS/TURN													
ARC SHOP	459.9	463.5	436.5	453.9	428.5	444.0	436.5	394.5	506.6	538.9	538.4	528.2	472.7
CASTER	439.8	446.2	415.8	434.4	410.9	428.1	418.3	371.2	473.2	503.8	507.8	492.4	448.5
ROD MILL	431.9	451.7	421.7	442.7	408.4	421.7	408.7	31.4	279.1	435.5	487.3	481.4	413.6
SPENDING $													
ARC SHOP													
SPECIAL/CAPITAL	14,453	4,435	320	157,390	2,509	3,586	1,449	585	0	2,782	0	2,431	189,860
SHUTDOWN	0	36,879	6,332	7,527	0	0	32,021	36,774	0	0	0	0	119,533
MANUFACTURING	1,777,272	1,268,678	1,457,428	1,783,829	1,312,853	1,350,851	1,494,620	938,224	1,757,981	1,809,327	1,593,868	1,804,791	18,261,722
CASTER													
SPECIAL/CAPITAL (DIR.)	33,698	5,277	27,264	27,952	2,509	0	4,290	18,240	29,372	15,933	0	784	157,239
SHUTDOWN	0	79,729	(922)	0	0	0	44,966	39,753	1,151	0	0	0	164,677
MANUFACTURING	970,397	630,493	817,697	1,011,547	676,941	722,970	816,567	462,808	760,575	835,802	710,562	740,001	9,156,358
ROD MILL													
SPECIAL/CAPITAL (DIR.)	32,837	17,430	3,497	26,250	31,353	62,815	18,854	35,919	58,837	42,533	879	(22,894)	328,320
SHUTDOWN	0	54,129	0	0	0	0	16	57,850	960	0	0	0	112,955
MANUFACTURING	978,480	654,148	766,514	949,392	711,763	703,260	900,988	344,892	886,818	1,189,296	948,231	1,033,617	9,996,607
TOTAL EXPENSE	948,421	814,958	812,765	880,392	747,491	786,267	884,693	778,545	759,524	898,705	817,514	839,145	9,888,420
COST/TON PRODUCED													
ARC SHOP MFG. (HM) *	40.63	47.55	43.72	40.98	39.79	41.82	51.63	60.26	45.85	40.83	39.83	45.48	43.65
ARC SHOP TOTAL (HM)	40.96	49.10	43.92	44.85	39.36	41.93	52.79	62.68	45.85	40.09	39.83	45.54	44.39
CASTER MFG. (BILLET) *	23.15	24.68	25.62	25.33	21.40	23.30	29.52	32.07	21.25	19.78	19.02	20.09	23.10
CASTER TOTAL (BILLET)	23.95	28.01	26.45	26.03	21.18	23.30	31.30	35.54	22.11	20.16	19.02	20.11	23.92
ROD MILL MFG. (ROD) *	24.71	27.29	23.96	26.17	24.51	26.11	26.12	524.44	40.10	26.19	25.40	28.80	27.70
ROD MILL TOTAL (ROD)	25.54	30.28	24.07	26.90	25.59	28.41	26.66	665.53	42.89	27.67	25.42	28.18	28.92
FIXED EXPENSE (ROD)	23.95	34.00	25.40	24.27	25.74	26.22	25.42	1179.74	34.42	21.22	21.90	23.38	27.40
YIELD %													
ARC SHOP	91.98%	91.84%	91.51%	91.43%	90.01%	88.76%	88.37%	87.68%	91.18%	90.79%	91.66%	92.47%	90.87%
CASTER	95.84%	95.74%	95.73%	95.87%	95.38%	96.07%	95.55%	93.49%	93.34%	93.48%	93.36%	92.95%	94.73%
ROD MILL	94.74%	95.03%	94.78%	94.56%	93.35%	94.26%	94.71%	62.60%	91.62%	91.32%	92.32%	92.20%	93.43%
USAGE STATS.													
ARC SHOP													
LABOR HOURS/TON	0.0758	0.0777	0.0788	0.0943	0.0834	0.0802	0.0924	0.1053	0.0680	0.0656	0.0699	0.0671	0.0777
KWH/TON (ECS)	487.93	490.81	502.31	491.36	504.34	494.62	486.39	484.82	438.74	417.02	442.94	451.20	478.87
KWH/TON (TOTAL)	554.14	561.00	573.04	560.44	574.77	556.53	572.40	586.65	488.67	471.35	497.92	507.25	536.22
OXYGEN CU.FT./TON (ECS)	239.71	246.59	258.08	254.21	263.94	214.18	192.77	235.79	217.56	207.53	200.88	275.68	234.97
OXYGEN CU.FT./TON (TOTAL)	273.78	361.18	319.94	305.03	359.34	521.75	786.28	920.24	1198.34	1300.90	1195.48	1059.95	729.37
ELECTRODE $/TON	6.88	6.17	6.78	6.36	5.15	6.84	7.55	8.31	7.15	6.99	6.71	7.52	6.93
REFRACTORY $/TON	4.44	6.41	4.52	5.15	5.75	6.02	5.21	9.54	6.82	5.14	5.27	8.97	5.91
OTHER MAINT. $/TON *	3.80	6.49	5.21	5.36	4.50	4.91	9.42	12.94	6.11	5.37	5.69	4.88	5.79
CASTER													
LABOR HOURS/TON	0.1715	0.1290	0.1948	0.1761	0.1808	0.1722	0.2015	0.3014	0.1459	0.1445	0.1573	0.1479	0.1739
MAINT. $/TON *	8.97	9.07	9.57	8.94	8.16	9.96	10.72	13.72	7.21	7.93	7.41	7.86	8.78
ROD MILL													
LABOR HOURS/TON	0.2775	0.3013	0.2812	0.2780	0.3017	0.2986	0.3169	9.3343	0.3794	0.2658	0.2441	0.2494	0.2923
KWH/TON	95.32	101.32	95.22	92.81	95.15	133.60	68.51	1534.71	149.17	132.00	120.72	121.93	111.22
GAS. CU.FT./TON	1189.77	1202.57	1200.89	1184.82	1254.20	1260.99	1374.47	6053.67	1472.19	1305.55	1249.21	1227.89	1265.16
MAINT $/TON *	6.81	8.52	6.02	7.81	6.76	5.81	6.49	100.11	10.55	6.70	6.95	9.54	7.51
LADLES													
MAINT. $/TON	4.22	4.75	4.11	5.05	3.51	3.25	5.49	3.77	3.85	3.03	3.21	2.69	3.96
SCRAP													
TONS PURCHASED (KSW)	31052	19498	21586	15452	18456	13337	18758	17970	20503	13451	25931	31523	247527
COST/TON (KSW)	76.36	81.98	89.29	102.19	107.14	101.61	98.02	111.17	109.35	108.15	107.75	101.93	98.37
PURCHASED (SPI)	12559	8409	5994	13710	12815	9386	12536	10401	12423	14812	5919	8355	131247
COST/TON (SPI)	72.26	73.95	77.95	96.34	98.54	91.36	89.15	98.22	97.85	91.81	82.99	80.64	88.71
LABOR RELATIONS													
LOST SIXTY DAY CASES	4	3	1	6	2	2	3	2	3	3	3	8	40
DOCTOR CASES	2	3	3	3	0	3	5	1	3	4	8	2	37
WRITTEN REPRIMANDS	10	7	6	17	11	8	13	10	22	22	12	18	15[illegible]
SUSPENSIONS/DISCHARGES	0	3	2	1	2	2	1	0	0	2	1	2	16

* COST EXCLUDES SPECIAL EXPENSE & SHUTDOWN

	89-01	89-02	89-03	89-04	89-05	89-06	89-07	89-08	89-09	89-10	89-11	89-12	Y-T-D
VARIANCE $													
PRODUCTIVITY	(240,605)	(184,351)	(92,258)	68,800	62,307	(19,141)							(425,24
QUALITY RELATED	38,988	25,690	170,938	195,309	64,519	(32,204)							463,240
SPENDING/USAGE	135,214	(240,720)	(371,212)	58,386	(89)	(558,315)							(976,73
SPENDING/PRICE	41,525	7,919	(45,084)	36,724	(27,787)	56,749							70,12
SCRAP PRICE	(271,270)	(418,257)	(602,453)	(689,553)	(211,166)	(275,917)							(2,388,61
RAW MTL. MIX	(104,691)	(127,884)	(115,397)	(174,308)	(115,156)	(82,899)							(719,455
SPI VS. PURCH MIX	131,860	41,851	92,797	70,925	64,816	3,828							403,65
ROD PURCHASE PRICE	(809)	(8,319)	(184)	0	0	0							(9,31
OTHER	(44,369)	(14,098)	(495,193)	(69,727)	133,444	(59,240)							(549,175
TOTAL VARIANCES	(334,957)	(917,281)	(1,457,976)	(423,444)	(29,912)	(967,939)							(4,131,50
TONS PRODUCED													
ARC SHOP	51,116	40,624	41,795	52,497	45,669	33,402							270,10
CASTER	47,883	38,887	39,087	54,234	43,332	31,428							253,9
ROD MILL	48,479	48,120	35,545	52,112	34,229	27,034							239,51
TURNS WORKED													
ARC SHOP	95.19	74.56	74.63	98.25	76.56	58.59							47
CASTER	94.94	74.61	74.41	98.08	76.21	58.50							47
ROD MILL	91.15	74.85	59.07	72.84	58.63	48.72							38
TONS/TURN													
ARC SHOP	537.0	544.8	560.1	585.2	596.5	570.1							56
CASTER	504.3	509.4	525.3	553.0	568.6	537.2							53
ROD MILL	531.8	541.8	601.7	715.4	715.6	663.9							61
SPENDING $													
ARC SHOP													
SPECIAL/CAPITAL	25,759	44,169	20,300	25,996	42,143	(33,833)							124,5
SHUTDOWN	0	0	0	0	0	113,500							113,5
MANUFACTURING	2,122,895	1,811,574	1,978,349	2,450,388	1,816,867	1,595,484							11,775,55
CASTER													
SPECIAL/CAPITAL (DIR.)	814	5,619	0	0	0	0							6,43
SHUTDOWN	0	0	0	0	0	41,500							41,500
MANUFACTURING	975,147	823,235	869,693	950,211	891,217	689,230							5,198,73
ROD MILL													
SPECIAL/CAPITAL (DIR.)	1,214	450	0	(14,445)	0	0							(12,78
SHUTDOWN	0	0	0	0	0	60,800							60,80
MANUFACTURING	1,212,860	1,151,951	1,016,692	1,157,749	853,056	722,484							6,114,79
FIXED EXPENSE	1,010,423	864,094	877,461	928,272	790,134	773,760							5,244,14
COST/TON PRODUCED													
ARC SHOP MFG. (HM) *	41.53	44.59	47.33	42.62	39.78	47.77							43.6
ARC SHOP TOTAL (HM)	42.84	45.68	47.82	43.07	40.71	50.15							44.4
CASTER MFG. (BILLET) *	20.37	21.66	22.25	17.52	20.57	21.93							20.4
CASTER TOTAL (BILLET)	20.38	21.81	22.25	17.52	20.57	23.25							20.6
ROD MILL MFG. (ROD) *	25.02	28.71	28.60	22.22	23.55	26.72							25.5
ROD MILL TOTAL (ROD)	25.04	28.72	28.60	21.94	23.55	28.97							25.7
FIXED EXPENSE (ROD)	20.84	21.54	24.69	17.81	21.81	28.62							21.8
YIELD %													
ARC SHOP	92.35%	92.55%	92.98%	92.03%	91.38%	89.08%							91.8
CASTER	93.68%	93.56%	93.52%	94.32%	94.88%	94.09%							94.0
ROD MILL	92.34%	92.73%	94.21%	95.14%	94.94%	94.84%							93.5
USAGE STATS.													
ARC SHOP													
LABOR HOURS/TON	0.0644	0.0680	0.0679	0.0619	0.0664	0.0770							0.06
KWH/TON (FCS)	457.11	451.63	439.09	423.35	439.08	478.27							445.3
KWH/TON (TOTAL)	494.82	511.72	499.34	481.16	493.87	541.08							506.5
OXYGEN CU.FT/TON (FCS)	246.59	214.24	185.34	183.54	198.67	104.87							193.
OXYGEN CU.FT/TON (TOTAL)	840.80	968.79	1005.72	1033.55	824.04	685.08							904.5
ELECTRODE $/TON	6.91	6.88	6.82	6.89	6.72	7.30							6.9
REFRACTORY $/TON	6.25	6.49	6.66	6.34	5.17	8.00							6.3
OTHER MAINT. $/TON *	6.00	7.06	9.42	7.00	6.86	9.78							7.3
CASTER													
LABOR HOURS/TON	0.1641	0.1688	0.1621	0.1464	0.1380	0.1536							0.1551
MAINT. $/TON *	8.41	7.95	9.20	7.44	8.97	10.03							8.55
ROD MILL													
LABOR HOURS/TON	0.2349	0.2298	0.2428	0.1837	0.1924	0.2231							0.215
KWH/TON	113.95	115.19	114.96	111.57	110.88	128.53							114.9
GAS. CU.FT./TON	1252.49	1245.09	1208.62	1181.44	1248.11	1321.78							1236.4
MAINT $/TON *	6.97	9.72	10.21	6.35	6.66	9.28							7.
LADLES													
MAINT. $/TON	3.38	4.42	2.80	1.66	2.35	2.87							2.
SCRAP													
TONS PURCHASED (KSW)	22226	31552	33828	38762	32416	30646							189
COST/TON (KSW)	115.87	114.68	123.38	114.21	112.78	118.25							115.
TONS PURCHASED (SPI)	9976	9972	10551	13548	11517	11487							67
COST/TON (SPI)	92.38	98.12	93.49	95.55	94.01	92.14							94.
LABOR RELATIONS													
LOST WORK DAY CASES	4	2	4	1	3	3							1
DOCTOR CASES	6	7	6	4	4	8							3
WRITTEN REPRIMANDS	10	13	11	9	17	8							
SUSPENSIONS/DISCHARGES	3	3	2	5	0	0							1

* COST EXCLUDES SPECIAL EXPENSE & SHUTDOWN

EXHIBIT II
KEYSTONE STEEL & WIRE
STEEL WORKS HIGHLIGHTS
CY 1989

	89-01	89-02	89-03	89-04	89-05	89-06	89-07	89-08	89-09	89-10	89-11	89-12	Y-T-D
TONS PLANNED													
ARC SHOP	44,851	49,214	49,393	62,256	50,216	62,770	62,770	50,216	50,216	63,799	51,040	38,281	635,022
CASTER	42,367	46,532	46,800	58,980	47,580	59,475	59,475	47,520	47,580	60,450	48,360	36,269	601,456
ROD MILL	43,790	44,694	43,875	56,440	44,800	57,000	56,170	45,210	45,210	56,855	45,895	34,250	575,069
TONS PRODUCED (ACTUAL)													
ARC SHOP	44,851	49,214	50,647	65,104	50,500	62,520	60,460	45,688	52,297	56,295	48,070	30,133	615,875
CASTER	42,367	46,532	47,754	61,468	47,992	59,352	57,152	43,174	49,818	53,719	45,844	28,617	583,971
ROD MILL	43,790	44,694	48,146	55,477	45,711	56,988	49,830	42,492	48,022	62,358	48,433	28,789	574,731
TURNS PLANNED													
ARC SHOP	76.72	78.78	77.76	97.20	77.76	97.20	97.20	77.76	77.76	97.20	77.76	58.32	991.40
CASTER	76.56	78.51	76.73	95.91	76.73	95.91	95.91	76.73	76.73	95.91	76.73	57.55	979.91
ROD MILL	67.10	66.42	62.96	80.39	63.93	82.33	79.42	63.93	63.93	80.39	64.89	48.43	824.11
TURNS WORKED (ACTUAL)													
ARC SHOP	76.72	78.78	75.56	95.89	77.75	96.63	96.00	76.09	76.78	93.47	77.56	55.47	976.70
CASTER	76.56	78.51	75.50	95.14	77.40	96.39	95.36	74.00	76.50	93.22	77.40	55.61	972.55
ROD MILL	67.10	66.42	62.55	78.19	61.77	79.67	84.71	62.27	65.81	84.84	70.23	40.47	824.03
TONS/TURN (PLANNED)													
ARC SHOP	584.6	624.7	635.2	640.5	645.8	645.8	645.8	645.8	645.8	656.4	656.4	656.4	640.5
CASTER	553.4	592.7	609.9	615.0	620.1	620.1	620.1	620.1	620.1	630.3	630.3	630.2	613.8
ROD MILL	652.6	672.9	696.9	702.1	702.1	702.1	707.2	707.2	707.2	707.2	707.2	707.2	697.8
TONS/TURN (ACTUAL)													
ARC SHOP	584.6	624.7	670.3	679.0	650.6	647.1	629.8	600.4	681.1	602.3	619.8	543.2	630.6
CASTER	553.4	592.7	631.8	646.1	619.9	615.8	599.3	577.2	651.2	576.2	591.7	518.2	600.5
ROD MILL	652.6	672.9	769.7	709.5	740.0	715.3	588.2	682.4	729.7	735.0	689.6	711.4	697.5
SPENDING $													
ARC SHOP													
SPECIAL/CAPITAL	32,491	13,425	29,503	52,600	160,537	(67,021)	8,768	9,249	10,932	60,577	58,162	(597)	368,626
SHUTDOWN	14,520	12,247	12,247	15,309	12,247	5,129	21,290	16,960	16,960	28,300	22,660	156,881	334,660
MANUFACTURING	1,887,080	2,355,681	2,027,274	2,074,547	2,177,731	3,022,875	2,896,031	2,081,696	2,137,152	2,758,497	2,148,038	1,286,460	27,653,002
CASTER													
SPECIAL/CAPITAL (DIR.)	0	0	2,663	0	0	2,135	(1,243)	2,369	3,037	1,859	54	11,673	22,547
SHUTDOWN	13,849	19,984	19,984	24,980	19,984	(12,382)	34,600	27,680	27,680	46,200	36,980	(5,582)	253,956
MANUFACTURING	928,116	833,734	852,341	1,278,111	961,746	1,230,922	1,167,509	945,862	1,042,625	1,182,128	1,024,360	767,143	12,221,797
ROD MILL													
SPECIAL/CAPITAL (DIR.)	0	0	2,283	32,000	26,000	(56,169)	30,902	26,985	28,513	32,494	26,000	(142,000)	7,008
SHUTDOWN	8,395	11,025	11,025	13,782	11,025	13,782	19,200	15,360	15,360	25,700	20,560	254,949	420,163
MANUFACTURING	1,042,504	929,887	984,955	1,240,494	1,052,490	1,100,507	1,310,407	1,086,619	1,089,907	1,335,150	1,107,389	800,137	13,168,614
FIXED EXPENSE	915,914	843,748	926,687	1,001,958	869,147	1,085,766	1,105,487	926,536	929,194	1,017,203	885,266	857,363	11,364,269
COST/TON PRODUCED													
ARC SHOP MFG. (HR) *	42.07	47.87	40.03	44.15	43.05	48.34	47.90	45.56	40.87	49.00	44.69	42.69	44.90
ARC SHOP TOTAL (HR)	43.12	48.39	40.85	45.20	46.46	47.35	48.40	46.14	41.46	50.58	46.37	47.08	46.04
CASTER MFG. (BILLET) *	21.91	17.92	17.85	20.79	20.04	20.87	20.43	21.89	20.93	22.01	22.34	26.62	20.93
CASTER TOTAL (BILLET)	22.23	18.35	18.32	21.20	20.46	20.70	21.01	22.59	21.55	22.90	23.15	26.83	21.40
ROD MILL MFG. (ROD) *	23.81	20.81	20.46	22.36	23.03	20.06	26.30	25.57	22.70	21.41	22.86	27.79	22.91
ROD MILL TOTAL (ROD)	24.90	21.05	20.73	23.19	23.04	20.11	27.30	26.57	23.61	22.34	23.83	31.72	23.66
FIXED EXPENSE (ROD)	20.92	18.88	19.25	18.06	19.01	19.05	22.19	21.80	19.35	16.31	18.28	29.78	19.77
YIELD % PLAN													
ARC SHOP 91.00%	90.32%	90.00%	91.49%	91.63%	92.13%	91.07%	89.52%	91.93%	90.84%	91.78%	90.02%	89.27%	90.89%
CASTER 94.75%	94.46%	94.55%	94.29%	94.42%	94.85%	94.92%	94.53%	94.50%	95.26%	95.41%	95.37%	95.63%	94.82%
ROD MILL 95.00%	94.13%	94.21%	95.41%	95.13%	94.76%	94.39%	93.14%	93.90%	94.22%	94.09%	94.01%	94.84%	94.38%
USAGE STATS.													
ARC SHOP													
LABOR HOURS/TON	0.0748	0.0693	0.0675	0.0675	0.0735	0.0694	0.0697	0.0752	0.0651	0.0745	0.0788	0.0884	0.0714
KWH/TON (FCS)	457.94	453.71	440.27	440.45	443.59	455.45	462.16	460.35	448.78	451.09	456.08	483.18	453.15
KWH/TON (TOTAL)	510.51	500.33	490.30	488.56	493.00	518.50	501.27	516.56	499.53	504.45	508.09	552.54	505.65
OXYGEN CU.FT/TON (FCS)	178.37	125.67	200.59	189.00	199.75	180.93	168.90	205.48	167.44	151.56	141.51	119.11	171.05
OXYGEN CU.FT/TON (TOTAL)	752.02	1003.92	904.97	885.06	912.12	757.07	681.77	634.52	494.56	575.52	451.56	464.41	721.40
ELECTRODE $/TON	7.82	8.02	6.60	7.20	7.31	7.41	6.98	7.16	6.50	6.91	6.33	7.91	7.15
REFRACTORY $/TON	4.38	6.21	5.43	7.06	5.05	6.90	5.85	5.43	4.41	6.63	5.22	5.58	5.76
OTHER MAINT. $/TON *	9.62	10.94	5.60	7.16	8.67	10.56	12.11	9.03	7.46	12.90	10.61	4.16	9.28
CASTER													
LABOR HOURS/TON	0.1533	0.1313	0.1292	0.1240	0.1327	0.1329	0.1376	0.1457	0.1291	0.1455	0.1346	0.1392	0.1357
MAINT. $/TON *	10.44	7.54	6.70	9.02	8.53	8.53	9.11	9.04	7.76	9.60	8.51	13.52	8.86
ROD MILL													
LABOR HOURS/TON	0.2054	0.1964	0.1657	0.1831	0.1750	0.1782	0.2184	0.2048	0.1791	0.1714	0.1601	0.2163	0.1877
KWH/TON	87.40	113.66	112.62	110.46	106.90	91.26	123.79	109.05	101.41	105.29	108.73	121.77	107.13
GAS. CU.FT./TON	1348.20	1340.19	1210.81	1231.23	1220.02	1219.17	1208.07	1254.02	1265.24	1256.46	1329.14	1329.87	1271.29
MAINT $/TON *	7.93	4.88	5.50	6.26	7.50	5.22	8.64	8.59	5.93	5.52	5.44	10.03	6.60
LADLES													
MAINT. $/TON	3.05	2.32	2.47	2.47	2.30	2.70	2.81	3.23	2.03	2.40	3.27	1.81	2.67
SCRAP													
TONS PURCHASED (KSW)	42311	30060	22387	49560	44627	49757	39289	34423	27906	47486	44674	27815	462296
COST/TON (KSW)	116.24	120.43	120.00	118.72	114.94	113.00	109.00	109.30	106.22	103.03	95.82	97.00	110.30
TONS PURCHASED (SPI)	14511	11619	10435	13391	11095	11944	10004	9736	9780	16061	11409	7926	138909
COST/TON (SPI)	98.11	105.35	102.24	96.22	97.09	93.33	88.33	89.56	91.60	87.67	82.26	82.25	93.25
LABOR RELATIONS													
LOST WORK DAY CASES	4	6	2	4	2	5	3	3	1	8	2	3	43
DOCTOR CASES	9	4	7	7	4	11	13	4	5	6	4	5	79
WRITTEN REPRIMANDS	22	22	10	12	7	14	20	12	8	12	21	9	169
SUSPENSIONS/DISCHARGES	3	5	2	1	0	1	2	1	0	1	0	0	16

* COST EXCLUDES SPECIAL EXPENSE & SHUTDOWN

KEYSTONE STEEL & WIRE
STEEL WORKS HIGHLIGHTS
CY 1990

	90-01	90-02	90-03	90-04	90-05	90-06	90-07	90-08	90-09	90-10	90-11	90-12	Y-T-D
TONS PLANNED													
ARC SHOP	50,997	50,546	51,369	66,766	52,192	51,780	64,677	50,957	51,780	67,811	53,815	40,675	652,565
CASTER	48,320	47,892	48,672	63,261	49,452	49,062	61,281	48,282	49,062	64,251	50,232	38,540	618,307
ROD MILL	45,225	45,225	45,895	59,220	47,905	47,905	56,025	45,225	47,570	60,175	48,575	36,255	585,200
TONS PRODUCED (ACTUAL)													
ARC SHOP	48,290	54,823	51,631	65,837	54,271	50,885	62,727	47,931	48,153	61,937	51,751	39,374	637,609
CASTER	45,903	52,581	49,452	63,092	51,916	48,498	59,971	45,738	45,977	59,331	49,669	37,693	609,820
ROD MILL	45,811	50,105	51,649	67,525	55,009	53,390	66,435	51,611	44,253	53,245	36,174	48,577	623,784
TURNS PLANNED													
ARC SHOP	79.63	77.63	77.63	98.63	77.63	77.63	98.50	77.63	77.63	98.63	77.63	59.75	978.50
CASTER	78.60	76.60	76.60	97.30	76.70	76.70	97.30	76.60	76.70	97.40	76.70	58.90	966.10
ROD MILL	64.60	64.60	64.60	81.10	64.70	64.70	80.80	64.60	64.70	80.20	64.80	48.60	807.20
TURNS WORKED (ACTUAL)													
ARC SHOP	78.28	77.69	73.84	95.44	76.13	75.94	94.19	74.84	74.97	94.91	78.25	59.84	954.31
CASTER	77.48	77.41	73.38	94.85	75.95	75.46	93.77	74.30	74.57	93.95	77.81	59.75	948.68
ROD MILL	68.86	72.13	68.30	91.96	73.03	74.74	90.79	68.11	52.10	71.42	47.37	59.30	838.11
TONS/TURN (PLANNED)													
ARC SHOP	640.5	651.2	661.8	677.0	672.4	667.1	656.6	656.5	667.1	687.6	683.0	680.8	666.9
CASTER	614.8	625.2	635.4	650.2	644.7	639.7	629.8	630.3	639.7	659.7	654.9	654.3	640.0
ROD MILL	700.1	700.1	710.4	730.2	740.4	740.4	700.3	700.1	735.2	750.3	749.6	746.0	725.0
TONS/TURN (ACTUAL)													
ARC SHOP	616.9	705.7	699.2	689.8	712.9	670.1	666.8	640.4	642.3	652.6	661.4	657.9	668.1
CASTER	592.4	679.3	673.9	665.2	683.6	642.7	639.5	615.6	616.6	631.5	638.3	630.8	642.8
ROD MILL	665.3	694.6	756.2	734.3	753.2	714.3	731.7	757.8	849.4	745.5	763.7	819.2	744.3
SPENDING $													
ARC SHOP													
SPECIAL/CAPITAL	9,090	22,137	105,315	1,714	138	(5,203)	38,119	24,789	26,028	55,869	(11,330)	72,475	339,141
SHUTDOWN	31,746	32,736	32,952	58,448	36,678	36,678	45,848	36,678	36,678	45,848	36,678	(14,136)	414,832
MANUFACTURING	2,203,724	2,402,734	2,321,361	2,787,989	2,243,793	2,357,554	2,753,256	2,248,828	2,241,918	2,680,502	2,273,375	1,876,282	28,303,316
CASTER													
SPECIAL/CAPITAL (DIR.)	1,004	(71)	0	57	1,386	10,187	49,359	15,901	25,662	40,048	25,548	24,381	193,382
SHUTDOWN	26,545	35,487	31,504	52,540	34,352	34,352	42,940	34,352	34,353	42,940	34,352	205,046	608,683
MANUFACTURING	1,051,393	1,055,996	953,216	1,193,070	1,022,242	986,678	1,195,022	923,262	957,356	1,153,589	1,005,964	785,128	12,202,924
ROD MILL													
SPECIAL/CAPITAL (DIR.)	0	0	0	21,000	4,741	8,513	37,950	60,423	44,621	46,664	11,197	40,375	277,484
SHUTDOWN	48,608	50,290	49,449	81,361	54,049	54,049	217,561	(95,951)	54,049	67,561	54,049	(95,001)	540,074
MANUFACTURING	1,247,225	1,244,513	1,312,236	1,487,030	1,062,301	1,140,956	1,490,717	1,162,444	1,024,741	1,179,709	979,729	990,185	14,321,786
FIXED EXPENSE	970,367	897,902	897,865	1,050,459	879,913	1,015,896	1,131,560	948,137	959,626	1,058,260	916,928	940,419	11,667,332
COST/TON PRODUCED													
ARC SHOP MFG. (HM) *	45.64	43.83	44.96	42.35	41.34	46.33	43.89	46.75	46.56	41.99	43.93	47.65	44.39
ARC SHOP TOTAL (HM)	46.48	44.83	47.64	43.26	42.02	46.95	45.23	48.03	47.86	43.63	44.42	49.88	45.57
CASTER MFG. (BILLET) *	22.90	20.08	19.28	18.91	19.69	18.78	19.93	20.19	20.82	19.44	20.25	20.83	20.01
CASTER TOTAL (BILLET)	23.50	20.76	19.91	19.74	20.38	19.61	21.47	21.28	22.13	20.84	21.46	26.91	21.33
ROD MILL MFG. (ROD) *	27.23	24.84	25.41	22.02	19.31	21.37	22.44	22.52	23.16	22.16	27.08	20.38	22.96
ROD MILL TOTAL (ROD)	28.29	25.84	26.36	23.54	20.42	22.54	26.28	21.83	25.39	24.30	28.89	19.26	24.27
FIXED EXPENSE (ROD)	21.18	17.92	17.30	15.56	16.00	19.03	17.03	18.37	21.68	19.88	25.35	19.36	18.78
YIELD % PLAN													
ARC SHOP 91.00%	91.61%	91.36%	91.67%	91.01%	91.51%	89.98%	92.09%	91.78%	91.71%	91.79%	91.27%	89.68%	91.33%
CASTER 94.75%	95.06%	95.91%	95.78%	95.83%	95.66%	95.31%	95.61%	95.42%	95.48%	95.79%	95.98%	95.73%	95.64%
ROD MILL 94.75%	92.94%	94.03%	94.13%	93.54%	93.80%	93.76%	93.59%	94.50%	94.98%	94.06%	94.12%	95.09%	94.01%
USAGE STATS.													
ARC SHOP													
LABOR HOURS/TON	0.0727	0.0615	0.0666	0.0637	0.0634	0.0662	0.0675	0.0724	0.0706	0.0677	0.0670	0.0700	0.0672
KWH/TON (FCS)	460.11	443.42	444.58	448.66	445.05	453.34	445.61	447.24	442.18	449.21	451.12	448.30	448.21
KWH/TON (TOTAL)	518.34	491.51	496.79	500.91	493.03	504.00	496.05	499.02	495.47	505.65	504.10	501.28	500.53
OXYGEN CU.FT/TON (FCS)	143.13	170.63	171.35	163.44	190.88	166.61	189.43	187.31	163.26	222.93	245.22	253.42	188.86
OXYGEN.CU.FT/TON (TOTAL)	583.47	532.52	624.82	550.50	582.88	584.45	661.20	613.73	585.62	587.33	645.37	723.56	603.20
ELECTRODE $/TON	7.15	6.75	7.11	7.03	6.87	7.00	6.97	7.46	6.95	6.84	7.20	7.30	7.01
REFRACTORY $/TON	5.88	4.20	5.54	4.72	4.54	5.46	5.41	5.21	6.62	3.39	4.70	4.51	4.98
OTHER MAINT. $/TON *	11.01	9.04	8.84	8.07	8.11	10.11	8.43	10.07	8.37	9.28	7.75	9.70	8.94
CASTER													
LABOR HOURS/TON	0.1494	0.1205	0.1265	0.1207	0.1193	0.1320	0.1337	0.1317	0.1322	0.1298	0.1261	0.1337	0.1299
MAINT. $/TON *	9.49	8.14	8.04	7.67	8.09	7.07	8.24	8.04	8.62	8.71	8.30	7.98	8.19
ROD MILL													
LABOR HOURS/TON	0.2196	0.1791	0.1739	0.1654	0.1646	0.1693	0.1711	0.1705	0.1523	0.1743	0.2143	0.1539	0.1742
KWH/TON	113.09	105.91	105.24	104.76	101.46	103.36	101.08	102.31	97.42	103.86	107.66	64.40	100.92
GAS. CU.FT./TON	1350.61	1293.93	1297.91	1257.97	1268.35	974.04	1465.28	1219.10	1245.83	1280.38	1283.40	1211.28	1265.92
MAINT $/TON *	8.78	7.20	8.69	6.65	8.36	5.54	7.08	6.80	7.35	5.65	9.11	3.98	6.68
LADLES													
MAINT. $/TON	3.45	2.52	2.57	2.66	2.86	2.79	3.61	3.54	2.36	2.16	2.88	1.79	2.78
SCRAP													
TONS PURCHASED (KSW)	19760	30413	38043	50638	33029	37901	41788	31806	41561	48579	31464	27041	440023
COST/TON (KSW)	98.00	101.21	100.12	104.08	110.19	110.44	107.07	111.02	110.95	106.08	107.65	102.71	106.19
TONS PURCHASED (SPI)	8325	10730	11206	13749	11427	10476	11467	12717	13998	17941	13690	8598	144336
COST/TON (SPI)	85.01	86.45	85.46	92.88	97.33	95.52	92.61	101.35	98.40	95.59	89.93	87.13	92.89
LABOR RELATIONS													
LOST WORK DAY CASES	3	2	3	1	3	4	5	5	2	0	0	6	34
DOCTOR CASES	4	3	3	5	6	8	5	5	7	7	3	5	61
WRITTEN REPRIMANDS	10	15	16	11	6	12	25	8	10	15	13	12	153
SUSPENSIONS/DISCHARGES	0	1	1	3	2	0	0	2	3	0	0	0	12

* COST EXCLUDES SPECIAL EXPENSE & SHUTDOWN

EXHIBIT II
KEYSTONE STEEL & WIRE
STEEL WORKS HIGHLIGHTS
CY 1991

	91-01	91-02	91-03	91-04	91-05	91-06	91-07	91-08	91-09	91-10	91-11	91-12	Y-T-D
TONS PLANNED													
ARC SHOP	51,937	51,455	52,272	67,901	53,197	52,601	65,827	51,864	52,681	68,419	53,906	41,471	663,911
CASTER	49,600	49,140	49,920	64,845	51,090	50,310	62,865	49,530	50,310	65,340	51,480	39,605	634,035
ROD MILL	53,515	53,515	52,170	63,075	48,510	46,305	60,465	47,260	43,800	62,500	49,170	36,075	617,240
TONS PRODUCED (ACTUAL)													
ARC SHOP	49,794	52,684	52,256	65,485	50,753	53,171	64,906	51,284	51,863	68,485	41,432	36,902	638,934
CASTER	47,424	50,551	50,142	62,639	48,727	51,025	62,348	49,284	49,889	65,576	39,725	35,317	612,648
ROD MILL	49,584	57,681	50,130	62,906	47,516	53,856	61,712	57,379	51,217	70,490	43,911	37,559	643,940
TURNS PLANNED													
ARC SHOP	79.78	77.79	77.79	98.73	77.79	77.79	98.73	77.79	77.79	98.73	77.79	59.84	980.35
CASTER	78.77	76.81	76.81	97.40	76.81	76.81	97.40	76.81	76.81	97.40	76.81	59.08	967.94
ROD MILL	74.42	74.42	71.52	84.00	63.78	60.09	84.00	65.72	57.99	81.10	63.78	47.36	829.20
TURNS WORKED (ACTUAL)													
ARC SHOP	77.00	77.94	77.00	97.56	70.97	77.31	96.16	78.56	77.34	97.50	73.31	59.97	969.50
CASTER	77.55	77.55	76.60	97.20	78.59	77.14	95.95	78.39	77.16	97.25	72.40	59.85	965.71
ROD MILL	65.09	71.30	63.77	74.70	57.64	70.27	79.03	72.85	60.81	87.82	55.10	50.37	817.55
TONS/TURN (PLANNED)													
ARC SHOP	651.0	661.5	672.0	687.7	687.7	677.2	666.7	666.7	677.2	693.0	693.0	693.1	677.2
CASTER	629.6	639.0	650.0	665.2	665.2	655.0	644.9	644.9	655.0	670.3	670.3	670.4	655.0
ROD MILL	719.1	719.1	729.5	750.2	760.5	760.5	719.1	719.1	755.4	770.9	770.9	770.7	744.4
TONS/TURN (ACTUAL)													
ARC SHOP	639.4	676.0	670.6	670.4	642.7	687.7	675.0	652.0	670.5	702.4	565.1	615.3	659.0
CASTER	611.5	651.9	653.9	644.4	620.0	661.5	649.0	620.7	646.6	674.3	540.7	590.1	634.4
ROD MILL	761.0	809.0	786.1	842.1	824.4	766.4	773.0	787.6	744.3	802.7	796.9	745.7	787.6
SPENDING $													
ARC SHOP													
SPECIAL/CAPITAL	39,500	43,100	16,020	0	8,973	14,560	(12,662)	16,140	10,300	6,317	69,905	148,416	369,457
SHUTDOWN	34,660	34,892	35,001	43,564	35,090	34,081	69,666	55,733	55,733	69,666	55,733	42,426	566,963
MANUFACTURING	2,290,293	2,219,721	2,090,939	2,560,000	2,025,491	2,179,760	2,711,604	2,138,772	2,204,171	2,815,535	1,740,494	1,645,443	26,630,231
CASTER													
SPECIAL/CAPITAL (DIR.)	1,020	718	7,020	(356)	9,202	14,356	5,476	24,705	6,424	4,089	4,583	3,933	81,984
SHUTDOWN	29,939	31,145	30,542	38,178	30,542	30,542	38,178	30,542	30,542	38,178	30,542	25,505	384,375
MANUFACTURING	960,794	1,015,223	990,713	1,167,943	885,638	963,285	1,172,643	949,447	1,001,473	1,265,241	805,817	730,003	11,818,226
ROD MILL													
SPECIAL/CAPITAL (DIR.)	58,300	671	1,938	0	8,309	11,893	(9,448)	289	5,325	3,413	0	3,597	84,367
SHUTDOWN	53,450	54,844	54,273	68,450	57,996	55,050	68,813	55,050	55,050	68,813	55,050	39,011	685,850
MANUFACTURING	1,112,666	1,148,645	1,094,106	1,189,607	919,218	1,192,370	1,357,599	1,183,725	1,158,899	1,531,797	958,070	957,742	13,796,444
FIXED EXPENSE	1,077,952	951,013	943,414	1,096,885	930,331	1,015,928	1,191,310	1,028,052	1,040,314	1,198,739	968,035	959,632	12,417,605
COST/TON PRODUCED													
ARC SHOP MFG. (HM) *	46.16	42.13	40.01	39.14	39.91	41.00	41.78	41.79	42.50	41.11	42.01	44.59	41.68
ARC SHOP TOTAL (HM)	47.65	43.61	41.01	39.81	46.78	41.93	42.66	43.11	43.93	42.22	45.04	49.76	43.14
CASTER MFG. (BILLET) *	20.26	20.08	17.96	18.65	18.18	18.08	18.81	19.26	20.07	19.29	20.20	20.67	19.29
CASTER TOTAL (BILLET)	20.93	20.71	18.71	19.25	18.99	19.76	19.51	20.39	20.81	19.94	21.17	21.50	20.05
ROD MILL MFG. (ROD) *	22.44	19.77	21.83	18.91	19.35	22.14	22.00	20.63	22.63	21.73	21.82	25.50	21.43
ROD MILL TOTAL (ROD)	24.69	20.74	22.95	20.00	20.74	23.30	22.96	21.59	23.81	22.76	23.07	26.63	22.62
FIXED EXPENSE (ROD)	21.74	16.49	18.82	17.44	19.75	18.86	19.30	17.92	20.47	17.01	22.05	25.55	19.28
YIELD % PLAN													
ARC SHOP 91.0%	89.74%	91.00%	91.25%	91.22%	91.00%	93.00%	91.07%	91.77%	92.56%	91.23%	90.62%	90.22%	91.34%
CASTER 95.5%	95.24%	95.95%	95.95%	95.77%	96.01%	95.96%	96.06%	96.10%	96.19%	95.75%	95.80%	95.71%	95.89%
ROD MILL 94.5%	93.85%	94.73%	94.30%	94.67%	95.28%	94.72%	94.60%	94.56%	94.68%	95.50%	95.60%	95.28%	94.81%
USAGE STATS.													
ARC SHOP													
LABOR HOURS/TON	0.0710	0.0663	0.0642	0.0672	0.0690	0.0701	0.0656	0.0717	0.0681	0.0689	0.0859	0.0797	0.0700
KWH/TON (FCS)	457.69	443.41	446.50	439.05	441.76	441.44	450.10	451.93	449.04	452.99	466.67	474.92	450.27
KWH/TON (TOTAL)	511.27	491.96	492.12	486.69	490.35	488.98	494.44	497.01	495.73	494.24	538.76	505.95	497.61
OXYGEN CU.FT/TON (FCS)	244.72	249.70	289.17	277.21	309.44	274.98	275.47	249.71	267.85	248.84	235.50	225.27	263.87
OXYGEN CU.FT/TON (TOTAL)	621.76	583.41	665.05	559.47	528.02	546.74	475.30	506.96	478.17	472.76	438.16	508.01	536.50
ELECTRODE $/TON	7.65	6.50	6.54	6.26	6.21	5.98	6.11	5.93	6.45	6.28	6.08	6.53	6.36
REFRACTORY $/TON	5.40	4.36	3.96	4.39	4.65	4.72	4.97	5.50	5.41	5.17	5.53	5.17	4.91
OTHER MAINT. $/TON *	8.10	9.26	6.53	7.31	6.40	7.14	6.89	6.80	7.88	7.32	7.37	8.41	7.43
CASTER													
LABOR HOURS/TON	0.1400	0.1230	0.1227	0.1251	0.1279	0.1221	0.1243	0.1250	0.1120	0.1194	0.1516	0.1452	0.1270
MAINT. $/TON *	7.50	8.31	7.19	7.63	6.79	7.10	8.10	7.65	9.10	7.80	8.12	9.33	7.86
ROD MILL													
LABOR HOURS/TON	0.1794	0.1480	0.1606	0.1406	0.1540	0.1623	0.1642	0.1562	0.1636	0.1561	0.1657	0.2031	0.1619
KWH/TON	113.07	109.03	94.54	64.91	104.10	102.51	104.54	104.30	105.04	106.24	95.01	136.75	102.25
GAS. CU.FT./TON	1272.10	925.12	1231.25	1210.65	1223.77	1223.43	1209.76	1172.42	1189.55	1156.54	1225.69	1209.15	1104.08
MAINT $/TON *	5.00	4.72	6.79	5.56	4.12	6.79	6.76	5.74	6.01	6.26	5.93	7.93	5.95
LADLES													
MAINT. $/TON	3.35	2.89	3.05	2.06	2.76	2.74	2.75	2.95	2.02	2.95	2.62	1.23	2.73
SCRAP													
TONS PURCHASED (KSW)	30503	44700	34067	55140	40744	41377	37910	37007	48457	54704	45177	32391	502267
COST/TON (KSW)	100.05	101.75	99.79	100.94	96.38	91.13	88.03	92.09	94.35	95.41	92.20	91.03	95.52
TONS PURCHASED (SPI)	9945	12017	10652	11947	11527	11459	12205	8786	10120	14696	8072	9325	131469
COST/TON (SPI)	87.90	85.65	84.50	85.23	83.04	77.00	76.97	81.30	84.66	85.05	80.03	80.19	83.02
LABOR RELATIONS													
LOST WORK DAY CASES	2	3	3	4	4	0	4	2	5	3	6	2	38
DOCTOR CASES	2	3	3	0	3	6	13	5	5	4	4	3	59
WRITTEN REPRIMANDS	13	2	7	15	15	9	19	11	7	14	6	6	124
SUSPENSIONS/DISCHARGES	1	0	0	0	0	2	0	2	1	2	0	4	12

* COST EXCLUDES SPECIAL EXPENSE & SHUTDOWN

TO:

R. SINGER	T. SUBBERT	G. WOODEN
J. KAUFFMAN	R. WITZIG	B. BARDWELL
L. PHILLIPS	R. STRANZ	J. TALAB
E. CAMPBELL	S. MORROW	L. HEIT
D. HOGUE	F. FARISCHON	R. SOMMERS
R. QUIN	J. DONAHUE	M. SAVOIE
E. MATTHEWS	R. POTTER	R. DAVISON
J. NORTHRUP	D. FOSTER	R. JAY
K. KOSEY	T. DEBLEICK	L. LANGLEY

WEEKLY

S.W. PRODUCTION STATISTICAL

REPORT

FISCAL PERIOD	92-12	PREPARED BY:
MONTH	DECEMBER	K. WHITE
WEEK NO.	3	S.W. ACCOUNTING

WEEK		1	2	3	4	5	MTD	YTD-92	CY-91	FY 92-10	FY 92-11
CHARGE		13902	14394	7266			35562	722141	699542	72126	57643
DD.	#1 FCE.	7025	6449	3488			16962	329138	316218	32949	24579
	#2 FCE.	5578	6623	3140			15341	328121	322716	32661	27795
	TOTAL	12603	13072	6628			32303	657259	638934	65610	52374
PLAN		13361	13361	13361			40084	668062	663911	67954	54280
VARIANCE		-758	-290	-6733			-7781	-10803	-24977	-2344	-1906
YIELD 91.30		90.65	90.82	91.22			90.84	91.02	91.34	90.97	90.86
FCE HRS.	#1 FCE.	90.50	79.25	44.17			213.92	3904.66	3857.24	396.23	296.00
	#2 FCE.	67.00	80.25	37.33			184.58	3908.55	3898.76	395.52	340.25
	TOTAL	157.50	159.50	81.50			398.50	7813.21	7756.00	791.75	636.25
SCHEDULED		160.00	160.00	168.00			488.00	7988.00	7852.00	800.00	640.00
VARIANCE		-2.50	-0.50	-86.50			-89.50	-174.79	-96.00	-8.25	-3.75
TONS/OPERATING HOUR:											
	#1 FCE.	77.63	81.37	78.97			79.29	84.29	81.98	83.16	83.04
	#2 FCE.	83.25	82.53	84.12			83.11	83.95	82.77	82.58	81.69
	TOTAL	80.02	81.95	81.33			81.06	84.12	82.38	82.87	82.32
STD. 84.8125		84.812	84.812	84.812			84.812	84.8125	84.65	84.812	84.812
VARIANCE		-4.79	-2.86	-3.48			-3.75	-0.69	-2.27	-1.95	-2.50
TAP TO TAP		2.16	2.13	2.14			2.14	2.06	2.11	2.09	2.09
AVG. HEAT SIZE FCE 1		171.35	174.29	174.41			173.08	173.41	174.80	172.51	170.69
AVG. HEAT SIZE FCE 2		174.30	174.29	174.45			174.33	172.88	173.69	173.73	173.72
AVG. HEAT SIZE		172.64	174.29	174.43			173.67	173.24	174.19	173.57	172.28
CU.FT. LANCE O2/TON HM	#1 FCE.	317.76	292.52	316.33			307.87	267.39	265.48	286.39	324.95
	#2 FCE.	266.75	281.07	323.15			284.47	276.19	265.53	295.81	302.69
CU. FT. BURNER O2/TON HM	#1 FCE.	256.21	201.59	229.35			229.92	224.05	231.17	242.80	240.04
	#2 FCE.	268.94	286.88	222.93			267.26	239.24	229.95	214.32	226.66
BURNER GAS/TON HM	#1 FCE.	185.04	170.58	172.01			176.86	172.67	173.61	185.13	174.94
	#2 FCE.	197.22	211.38	191.08			202.08	187.13	170.79	180.64	176.29
K.W.H/TON HM (450)	#1 FCE.	468.97	462.00	452.01			462.83	443.10	449.10	444.61	461.06
K.W.H/TON HM (450)	#2 FCE.	450.67	448.69	447.73			449.21	444.97	451.42	445.76	447.09
TOTAL K.W.H/TON HM		460.87	455.26	449.98			456.36	444.03	450.27	445.18	453.65
LBS TRODES/TON HM (6.50)	#1 FCE.	7.19	6.53	8.86			7.26	6.61	6.38	6.65	7.08
LBS TRODES/TON HM (6.50)	#2 FCE.	7.05	6.36	6.26			6.59	6.43	6.35	6.71	5.96
TOTAL TRODES/TON HM		7.13	6.44	7.63			6.95	6.52	6.36	6.68	6.49
DELAYS											
	% MECHANICAL	0.53	0.57	0.31			0.50	0.54	0.77	1.29	0.42
	% ELECTRICAL	0.00	0.10	0.00			0.04	0.62	0.69	1.17	0.20
	% SHOP	3.07	5.59	6.85			4.85	5.32	5.16	3.84	3.98
	% POWER DEMAND	0.50	0.38	0.92			0.54	0.18	0.33	0.39	0.35
	% SCRAP	1.38	3.61	1.94			2.38	1.43	2.09	1.52	2.20
	% 1 FCE. OPERATION	2.17	0.42	1.84			1.40	0.84	2.39	0.56	1.22
	% OTHER	0.00	0.00	0.00			0.00	0.00	0.00	0.26	0.00
	% TOTAL	7.64	10.67	11.86			9.72	8.93	11.43	9.03	8.36
SCED. HEAT PERF.											
	COMPOSITE % OK	90.00	100.00	50.00			86.96	87.78	89.60	90.00	79.59
	ALL HEATS	79.45	74.67	76.32			76.88	83.16	83.78	69.84	79.28
CHEMISTRY PERF.											
	COMPOSITE # HTS	15	20	10			45	713	621	60	30
	COMPOSITE # OK	86.67	100.00	80.00			91.11	93.41	91.95	93.33	96.67
	ALL HTS # HEATS	73	75	38			186	3794	3668	378	304
	ALL HTS % OK	95.89	96.00	94.74			95.70	92.99	95.12	76.19	98.03

WEEK	CASTER 1	2	3	4	5	MTD	YTD-92	CY-91	FY 92-10	FY 92-11
HOT METAL INTENDED	12718	13072	6628			32418	661219	644804	65720	52769
HOT METAL CHARGE	12603	13072	6628			32303	657259	638934	65610	52374
HOT METAL ABORTED FCE 2.	0	0	0			0	1960	3100	0	0
HOT METAL ABORTED FCE 1.	115	0	0			115	2000	2770	110	395
HOT METAL ABORTED TOTAL	115	0	0			115	3960	5870	110	395
BILLETS PRODUCED:										
ACTUAL	12147	12610	6406			31164	631952	612648	63374	50466
PLAN	12800	12800	12800			38400	640000	634043	65100	52000
VARIANCE	-653	-190	-6394			-7236	-8048	-21395	-1726	-1535
YIELD % 95.8	96.38	96.47	96.65			96.47	96.15	95.89	96.59	96.36
HOURS WORKED										
ACTUAL	157.20	158.96	81.52			397.68	7784.16	7725.68	788.48	631.92
SCHEDULED	160.00	160.00	168.00			488.00	7988.00	7860.00	800.00	640.00
VARIANCE	-2.80	-1.04	-86.48			-90.32	-203.84	-134.32	-11.52	-8.08
TONS/OPERATING HOUR:										
ACTUAL	77.27	79.33	78.58			78.36	81.18	79.30	80.37	79.86
STD. (81.25)	81.25	81.25	81.25			81.25	81.25	81.88	81.25	81.25
VARIANCE	-3.98	-1.92	-2.67			-2.89	-0.07	-2.57	-0.88	-1.39
TONS/OPERATING TURN (650)	618	635	629			627	649	634	643	639
TONS/SCHED. TURN (640)	607	631	305			511	633	624	634	631
% OK TEMPS	71.23	64.00	63.16			66.67	62.41	61.86	57.14	73.03
HEATS/TURN										
5"	3.72	3.77	3.73			3.74	3.90	3.80	3.84	3.85
AVG. TONS/HEAT										
5"	166.40	168.14	168.58			167.55	166.57	167.02	167.65	166.00
SCRAP TONS	456	461	222			1139	25307	26286	2237	1908
%SCRAP/HM CHARGED	3.62	3.53	3.35			3.53	3.85	4.11	3.41	3.64
%CAST/HM INTENDED	95.51	96.47	96.65			96.13	95.57	95.01	96.43	95.63
%SHROUDED	84.07	83.17	85.34			83.96	85.70	85.51	84.85	84.36
%ABORTED DUE TO:										
A.S. TEMP	0.00	0.00	0.00			0.00	0.10	0.28	0.00	0.00
NON-START	0.00	0.00	0.00			0.00	0.00	0.00	0.00	0.00
A.S. PRACTICE	0.90	0.00	0.00			0.35	0.15	0.11	0.11	0.45
TIMING	0.00	0.00	0.00			0.00	0.00	0.00	0.00	0.00
CASTER OPER.	0.00	0.00	0.00			0.00	0.10	0.21	0.05	0.00
MAINT-ELEC	0.00	0.00	0.00			0.00	0.06	0.13	0.00	0.00
MAINT-MECH	0.00	0.00	0.00			0.00	0.10	0.16	0.00	0.29
OTHER	0.00	0.00	0.00			0.00	0.03	0.01	0.00	0.00
TOTAL	0.90	0.00	0.00			0.35	0.53	0.89	0.17	0.75
TONS DISCARDS	376	352	173			901	19940	19631	1745	1501
%DISCARDS/TON PROD.	3.09	2.79	2.70			2.89	3.16	3.20	2.75	2.97
% 5&6 STRAND FINISH	94.52	100.00	97.37			97.31	96.84	96.83	98.94	99.01
% 6 STRAND FINISH ONLY	98.63	85.33	78.95			89.25	81.29	80.15	89.15	93.09
% FREE OPEN	87.67	80.00	84.21			83.87	81.60	78.82	87.57	86.51

WEEK	ROD MILL 1	2	3	4	5	MTD	YTD-92	CY-91	FY 92-10	FY 92-11
BILLETS CHARGED										
# OF BILLETS	7464	6572	4750			18786	328678	330410	29041	22867
NET TONS	15619	13730	9973			39322	681298	679218	60954	47988
RODS PRODUCED										
# OF COILS	7327	6471	4685			18483	321944	319901	28389	22429
NET TONS	15096	13334	9641			38070	654558	643941	58376	46060
PLAN	12920	12920	12920			38760	658920	617241	59280	50160
VARIANCE	2176	414	-3279			-690	-4362	26701	-904	-4100
YIELD 95.4	96.65	97.11	96.67			96.82	96.08	94.81	95.77	95.98
EARNED HRS %	110.71	110.73	114.25			111.59	105.50	105.81	106.01	105.04
HOURS WORKED										
ACTUAL	138.96	122.72	86.00			347.68	6322.72	6540.40	561.20	446.88
SCHEDULED	144.00	144.00	96.00			384.00	6812.00	6932.00	608.00	480.00
VARIANCE	-5.04	-21.28	-10.00			-36.32	-489.28	-391.60	-46.80	-33.12
TONS/OPERATING HOUR:										
ACTUAL	108.63	108.65	112.10			109.50	103.52	98.46	104.02	103.07
STD. (98.125)	98.13	98.13	98.13			98.13	98.13	93.05	98.13	98.13
VARIANCE	10.51	10.53	13.98			11.37	5.40	5.41	5.90	4.94
TONS/OPERATING TURN (785)	869	869	897			876	828	788	832	825
TONS/SCED TURN (760)	839	741	803			793	769	743	768	768
P COILS	26	20	11			57	1883	4258	174	90
% SCRAPPED	0.31	0.31	0.23			0.29	0.59	1.34	0.61	0.40
# COBBLES	70	76	42			188	4012	5718	392	268
% COBBLES	0.94	1.16	0.88			1.00	1.22	1.73	1.35	1.17
% CONVEYOR COBS	0.39	0.64	0.42			0.48	0.42	0.65	0.35	0.36
% CENTER CUTS	0.42	0.68	0.62			0.55	0.58	0.91	0.60	0.54
GAS: MCF/TONS PROD.	1.20	1.20	1.14			1.18	1.20	1.18	1.24	1.22
GAS: MCF/TONS CHARGED	1.16	1.16	1.10			1.15	1.15	1.12	1.18	1.17
OTHER SCRAP COUNT	39	5	6			50	702	839	51	54
KWH/ROD TON	110.41	105.51	130.12			118.40	106.83	NA	110.09	111.64
DELAYS % TIME WORKED										
% CONVEYOR STOP	0.98	1.63	1.76			1.40	0.97	0.98	0.75	0.73
% MECHANICAL	1.16	1.81	0.95			1.34	2.01	2.43	1.39	2.10
% ELECTRICAL	2.36	1.55	0.35			1.58	1.89	2.22	2.22	2.21
% PASS CHANGE	1.56	3.87	1.07			2.25	2.87	2.48	2.53	2.57
% COBBLES	4.25	3.01	2.34			3.34	4.21	5.54	4.45	4.08
% OTHER	1.62	1.96	3.00			2.08	3.32	4.06	3.32	3.90
% CHARGE	0.00	0.00	0.00			0.00	0.17	0.37	0.00	0.00
% REFORM	0.00	0.16	0.00			0.06	0.04	0.23	0.02	0.00
% QUALITY	0.30	0.14	0.00			0.17	0.49	0.51	0.68	0.61
% TOTAL	12.23	14.12	9.48			12.22	15.97	18.83	15.37	16.20
TONS R8 SKID REJECTS (ON HOLD)	0	0	0			0	36	70	0	8
TONS R7 SKID REJECTS (SCRAP)	8	6	6			21	441	294	21	12
TOTAL SKIDS REJECTS /TON CHARGED	0.05	0.05	0.06			0.05	0.06	0.04	0.03	0.04

ROD COIL STRAPPING

WEEK	1	2	3	4	5	MTD	YTD-92	CY-91	FY 92-10	FY 92-11
COMPACTOR #4										
TURNS SCHEDULED	18	18	18			54	818.55	781.13	75.5	62
STRAPPED TONS	3814	3692	3632			11139	165274	137986	15624	12739
TONS PER TURN	212	205	202			206	202	177	207	205
COMPACTOR #1										
TURNS SCHEDULED	0	2	7			9	76.39	166.72	2	5
STRAPPED TONS	0	396	1169			1565	11825	23645	374	913
TONS PER TURN	0	198	167			174	155	142	187	183

ROD INSPECTION REPORT

219-250 PROD.										
% OK	97.85	95.026	96.124			96.579	96.47	95.68	95.428	97.367
TONS SCRAPPED	38	32	0			69	3545	7328	303	101
% SCRAPPED	0.326	0.345	0.234			0.306	0.64	1.49	0.606	0.471
TONS DOWNGRADED	277	444	352			1073	16095	15017	1941	756
% DOWNGRADED	1.822	4.630	3.641			3.115	2.89	2.83	3.965	2.161
DOWNGRADE REASON										
SLI	155	122	93			369	8212	5154	1119	406
LAP	21	47	25			93	1584	1212	293	93
FIN	0	0	0			0	169	409	39	0
FLAT	2	0	0			2	29	140	19	0
OFF HOLE	2	0	0			2	209	247	10	0
OTHER	76	262	226			565	5186	7064	393	214
SMALL	21	12	8			41	706	790	68	43
SCRAP REASON										
LAP	0	0	0			0	30	146	4	1
FIN	0	0	0			0	0	2	0	0
FLAT	0	0	0			0	6	14	2	0
OFF HOLE	0	0	0			0	1	0	0	0
OTHER	4	0	2			6.1	79.1	217	6	4
SMALL	0	6	11			16.5	662.5	1808	56	17
TANG	14	9	11			34	850.5	1717	76	26
281-469 PROD.										
% OK	90.535	94.694				93.190	85.07	91.05	85.004	74.595
TONS SCRAPPED	4	11				15	437	630	69	21
% SCRAPPED	0.191	0.217				0.207	0.35	0.55	0.624	0.186
TONS DOWNGRADED	200	194				394	18372	9328	1423	2777
% DOWNGRADED	9.273	5.089				6.602	14.57	8.40	14.372	25.107
DOWNGRADE REASON										
SLI	124	107				231	11479	5890	824	917
LAP	68	23				91	1969	1932	305	241
FIN	0	12				12	470	446	33	68
FLAT	0	0				0	50	84	8	0
OFF HOLE	2	4				6	64	0	4	0
OTHER	4	41				45	4212	880	237	1541
SMALL	2	6				8	128	96	12	10
SCRAP REASON										
LAP	0	0				0	5	8	0	0
FIN	0	1				1	17	14	3	2
FLAT	0	0				0	6	20	0	0
OFF HOLE	0	0				0	1	0	0	0
OTHER	0	0				0	55	14	13	3
SMALL	2	4				6	105	197	11	4
TANG	0	0				0	28	48	3	1

CS. ANALYSIS REPORT

	WEEK	1	2	3	4	5	MTD	YTD-92	CY-91	FY 92-10	FY 92-11
219	% CS	96.66	93.42	96.73			95.87	93.12	90.95	92.18	93.49
	% IQ	1.04	4.45	0.54			1.73	3.91	4.47	3.55	3.47
	% R1'S	1.36	1.96	2.45			1.86	2.08	2.73	2.63	2.57
	% SCRAP	0.94	0.18	0.27			0.53	0.90	1.86	0.97	0.47
250	% CS		78.15				78.15	87.49	90.46	86.21	94.31
	% IQ		18.29				18.29	9.52	6.98	9.51	1.63
	% R1'S		3.56				3.56	2.67	1.62	4.27	4.07
	% SCRAP							0.32	1.04		
266	% CS								95.71		
	% IQ								2.86		
	% R1'S								0.00		
	% SCRAP								1.43		
313	% CS		99.15				99.15	88.15	86.56	94.73	88.89
	% IQ		0.85				0.85	6.33	6.89	1.15	8.33
	% R1'S		0.00				0.00	5.20	2.98	3.95	2.78
	% SCRAP		0.00				0.00	0.32	0.90	0.16	0.00
297	% CS										
	% IQ										
	% R1'S										
	% SCRAP										
344	% CS							82.63	84.83		84.62
	% IQ							11.70	10.47		6.15
	% R1'S							5.67	4.56		9.23
	% SCRAP							0.00	0.13		0.00
281	% CS						100.00	90.15	92.62	93.04	88.92
	% IQ						0.00	7.17	5.14	4.40	9.58
	% R1'S						0.00	2.18	1.53	1.47	1.50
	% SCRAP						0.00	0.50	0.70	1.10	0.00
375	% CS		89.68				89.68	65.05	68.46	82.70	27.14
	% IQ		0.00				0.00	13.98	15.53	11.89	50.00
	% R1'S		9.51				9.51	20.65	15.72	4.86	22.86
	% SCRAP		0.81				0.81	0.32	0.44	0.54	0.00
422	% CS							76.74	81.48		
	% IQ							24.81	13.80		
	% R1'S							63.57	37.37		
	% SCRAP							176.74	48.48		
469	% CS										
	% IQ										
	% R1'S										
	% SCRAP										

27-Jan-97

EXHIBIT II

KEYSTONE STEEL & WIRE
STEEL WORKS HIGHLIGHTS
CY 1993

		93-01	93-02	93-03	93-04	93-05	93-06	93-07	93-08	93-09	93-10	93-11	93-12	Y-T-D
TONS PLANNED														
ARC SHOP		54,110	54,110	54,110	67,638	54,110	54,110	67,638	54,110	54,110	67,638	54,110	40,583	676,379
CASTER		52,000	52,000	52,000	65,000	52,000	52,000	65,000	52,000	52,000	65,000	52,000	39,000	650,000
ROD MILL		52,140	49,770	52,140	61,620	52,140	49,770	61,620	49,770	49,770	63,200	49,770	37,920	629,630
TONS PRODUCED (ACTUAL)														
ARC SHOP		46,834	55,137	54,899	66,859	53,853	53,660	67,530	51,574	54,492	67,691	54,574	41,607	668,709
CASTER		44,876	53,064	52,808	64,353	51,916	51,410	65,083	49,478	52,595	65,206	52,632	40,114	643,535
ROD MILL		45,858	58,840	60,629	79,994	57,272	59,456	72,226	55,839	55,664	68,749	55,481	45,098	715,107
TURNS PLANNED														
ARC SHOP		78.79	78.79	78.79	98.48	78.79	78.79	98.48	78.79	78.79	98.48	78.79	59.09	984.85
CASTER		78.79	78.79	78.79	98.48	78.79	78.79	98.48	78.79	78.79	98.48	78.79	59.09	984.85
ROD MILL		62.82	59.96	62.82	74.24	62.82	59.96	74.24	59.96	59.96	76.14	59.96	45.69	758.59
TURNS WORKED (ACTUAL)														
ARC SHOP		74.78	81.94	81.59	101.50	81.25	80.25	102.41	80.75	81.41	101.59	80.28	61.56	1009.31
CASTER		74.55	81.62	81.50	101.27	81.02	80.03	102.27	80.26	81.04	101.11	79.77	61.53	1005.97
ROD MILL		58.21	70.59	71.51	94.22	68.54	71.94	89.38	72.93	67.93	86.83	71.80	58.42	882.30
TONS/TURN (PLANNED)														
ARC SHOP		686.8	686.8	686.8	686.8	686.8	686.8	686.8	686.8	686.8	686.8	686.8	686.8	686.8
CASTER		660.0	660.0	660.0	660.0	660.0	660.0	660.0	660.0	660.0	660.0	660.0	660.0	660.0
ROD MILL		830.0	830.0	830.0	830.0	830.0	830.0	830.0	830.0	830.0	830.0	830.0	830.0	830.0
TONS/TURN (ACTUAL)														
ARC SHOP		626.3	672.9	672.8	658.7	662.8	668.7	659.4	638.7	669.4	666.3	679.8	675.8	662.5
CASTER		602.0	650.1	647.9	635.5	640.8	642.4	636.4	616.5	649.0	644.9	659.8	651.9	639.7
ROD MILL		787.8	833.5	847.8	849.0	835.6	826.5	808.1	765.7	819.4	791.8	772.7	772.0	810.5
SPENDING $														
ARC SHOP														
SPECIAL/CAPITAL		3,850	8,341	6,511	614	11,894	1,211	456	462	(45)	1,804	1,379	26,030	62,507
SHUTDOWN		48,000	48,000	48,000	60,000	48,000	48,000	60,000	20,626	44,780	55,975	44,780	(42,677)	483,484
MANUFACTURING		1,906,992	1,995,194	2,198,466	2,455,319	1,971,168	2,241,551	2,713,067	2,069,272	2,204,739	2,540,602	2,065,854	1,663,638	26,025,862
CASTER														
SPECIAL/CAPITAL (DIR.)		(123)	77,715	55,296	(11,021)	4,431	1,489	1,125	100	282	1,547	2,875	21,526	156,239
SHUTDOWN		48,000	48,000	48,000	60,000	48,000	48,000	60,000	36,009	46,589	58,237	46,589	96,119	643,543
MANUFACTURING		873,529	918,850	987,058	1,114,019	874,912	1,039,862	1,088,335	873,529	880,861	1,203,554	849,144	817,267	11,520,920
ROD MILL														
SPECIAL/CAPITAL (DIR.)		0	4,907	4,982	95,674	8,998	697	0	35,042	34,965	36,204	35,933	23,156	280,558
SHUTDOWN		53,800	53,800	53,800	67,250	53,800	53,800	67,250	92,824	58,391	72,989	58,391	58,947	745,042
MANUFACTURING		1,027,090	1,186,888	1,336,803	1,530,495	1,182,701	1,296,159	1,544,411	1,246,769	1,255,329	1,448,877	1,190,869	1,060,743	15,307,134
FIXED EXPENSE		1,284,688	1,126,174	1,140,189	1,368,163	1,108,215	1,179,732	1,407,834	1,200,499	1,224,476	1,411,480	1,191,044	1,167,777	14,810,271
COST/TON PRODUCED														
ARC SHOP MFG. (HM) *		40.72	36.19	40.05	36.72	36.60	41.77	40.18	40.12	40.46	37.53	37.85	39.98	38.92
ARC SHOP TOTAL (HM)		41.83	37.21	41.04	37.63	37.72	42.69	41.07	40.53	41.28	38.39	38.70	39.58	39.74
CASTER MFG. (BILLET) *		19.47	17.32	18.69	17.31	16.85	20.23	16.72	17.66	16.75	18.46	16.13	20.37	17.90
CASTER TOTAL (BILLET)		20.53	19.68	20.65	18.07	17.88	21.19	17.66	18.38	17.64	19.37	17.07	23.31	19.15
ROD MILL MFG. (ROD) *		22.40	20.17	22.05	19.13	20.65	21.80	21.38	22.33	22.55	21.07	21.46	23.52	21.41
ROD MILL TOTAL (ROD)		23.57	21.17	23.02	21.17	21.75	22.72	22.31	24.62	24.23	22.66	23.16	25.34	22.84
FIXED EXPENSE (ROD)		28.01	19.14	18.81	17.10	19.35	19.84	19.49	21.50	22.00	20.53	21.47	25.89	20.71
YIELD %	PLAN													
ARC SHOP	91.10%	89.22%	89.85%	90.68%	90.53%	89.54%	89.52%	90.29%	90.14%	89.72%	90.39%	90.25%	91.09%	90.11%
CASTER	96.10%	95.82%	96.24%	96.19%	96.25%	96.40%	95.81%	96.38%	95.94%	96.52%	96.33%	96.44%	96.41%	96.24%
ROD MILL	96.30%	95.94%	96.66%	96.73%	96.84%	96.73%	96.49%	96.13%	95.87%	96.14%	95.99%	95.86%	96.36%	96.33%
USAGE STATS.														
ARC SHOP														
LABOR HOURS/TON		0.0735	0.0618	0.0632	0.0644	0.0638	0.0641	0.0632	0.0667	0.0633	0.0659	0.0645	0.0647	0.0648
KWH/TON (FCS)		458.74	446.43	440.75	441.48	442.48	442.90	446.86	453.03	450.40	447.80	446.49	443.72	446.58
KWH/TON (TOTAL)		509.52	490.29	483.30	484.44	481.49	477.98	482.21	489.04	486.25	487.95	489.71	478.95	486.55
OXYGEN CU.FT/TON (FCS)		496.85	300.07	300.17	317.46	304.80	298.41	328.15	305.73	290.73	302.65	314.94	299.12	319.77
OXYGEN CU.FT/TON (TOTAL)		666.26	490.09	591.82	654.45	625.19	647.08	611.50	615.55	613.68	620.87	641.06	638.53	617.49
ELECTRODE #/TON		7.43	6.47	6.04	6.01	5.84	5.55	6.23	6.21	6.54	6.55	6.89	6.75	6.35
REFRACTORY $/TON		3.66	3.43	3.33	3.11	3.53	2.74	3.92	3.33	3.85	3.52	3.58	4.50	3.52
DUST $/TON		2.18	2.18	2.17	2.17	2.17	2.17	2.17	2.17	2.17	2.17	2.17	-0.79	1.99
OTHER MAINT. $/TON *		5.04	3.93	5.08	4.50	4.62	4.92	4.42	5.00	4.19	4.00	4.25	9.28	4.81
CASTER														
LABOR HOURS/TON		0.1512	0.1178	0.1164	0.1212	0.1214	0.1214	0.1185	0.1235	0.1174	0.1216	0.1161	0.1273	0.1222
MAINT. $/TON *		7.07	6.53	7.22	6.33	6.10	6.41	6.36	7.05	6.19	6.69	6.43	8.08	6.66
ROD MILL														
LABOR HOURS/TON		0.1895	0.1461	0.1479	0.1408	0.1521	0.1456	0.1520	0.1565	0.1584	0.1554	0.1597	0.1748	0.1550
KWH/TON		115.53	109.94	108.37	105.61	104.73	103.93	104.63	110.82	105.56	106.55	107.02	111.90	107.53
GAS CU.FT./TON		1257.57	1230.60	1230.64	1197.41	1203.00	1175.91	1372.91	1190.88	1188.31	1193.88	1211.50	1162.03	1220.50
MAINT $/TON *		5.69	5.43	6.37	4.07	4.87	3.89	5.22	6.06	5.98	5.25	5.77	6.09	5.32
LADLES														
MAINT. $/TON		2.58	1.92	3.02	2.29	2.15	2.50	2.18	2.71	2.34	3.56	1.85	2.25	2.46
SCRAP														
TONS PURCHASED (KSW)		24090	36401	30970	65212	44962	28276	63306	43436	30244	50573	49997	42361	509826
COST/TON (KSW)		90.65	103.54	107.54	104.73	103.04	105.47	115.25	113.87	114.91	125.42	131.21	135.44	113.93
TONS PURCHASED (SPI)		9697	11810	10707	15724	11524	9732	15521	13272	10621	14784	12624	13264	149278
COST/TON (SPI)		83.28	90.68	91.59	87.94	85.66	88.75	98.56	96.39	96.58	106.56	114.04	115.39	96.95
LABOR RELATIONS														
LOST WORK DAY CASES		3	3	0	5	3	3	2	7	4	6	2	2	40
DOCTOR CASES		14	4	5	5	12	5	13	11	9	6	7	4	95
WRITTEN REPRIMANDS		22	14	5	18	14	9	18	10	15	12	9	5	151
SUSPENSIONS/DISCHARGES		2	0	2	3	1	0	2	2	1	1	1	0	15

* COST EXCLUDES SPECIAL EXPENSE & SHUTDOWN

TO

R. SINGER
J. KAUFFMAN
L. PHILLIPS
E. CAMPBELL
D. HOGUE
E. MATTHEWS
J. NORTHRUP
K. KOSEY
R. QUIN

T. SUBBERT
R. WITZIG
R. STRANZ
S. MORROW
L. HEIT
G. DEAN
J. DONAHUE
R. POTTER
D. FOSTER

G. WOODEN
B. BARDWELL
J. TALAB
R. JAY
L. LANGLEY
F. FARISCHON
R. SOMMERS
M. SAVOIE
R. DAVISON

WEEKLY S.W. PRODUCTION STATISTICAL REPORT

FISCAL PERIOD	93–12
MONTH	DECEMBER
WEEK NO.	3

PREPARED BY:
K. WHITE
S.W. ACCOUNTING

ARC SHOP

		WEEK	1	2	3	4	5	MTD	YTD-93	CY-92	FY 93-10	FY 93-11
CHARGE			15659	14491	15524			45674	742118	722141	74885	60472
	#1 FCE.		6520	6228	6703			19451	327136	329138	33230	26979
	#2 FCE.		7652	7089	7415			22156	341573	328121	34461	27595
	TOTAL		14173	13317	14117			41607	668709	657259	67691	54574
PLAN			13528	13528	13528			40583	676377	668062	67638	54110
VARIANCE			645	-211	590			1024	-7668	-10803	53	464
YIELD 91.10			90.51	91.90	90.94			91.09	90.11	91.02	90.39	90.25
FCE HRS.	#1 FCE.		79.67	72.50	80.23			232.40	3911.42	3904.66	401.09	317.03
	#2 FCE.		87.33	84.75	88.02			260.10	4163.08	3908.55	411.66	325.22
	TOTAL		167.00	157.25	168.25			492.50	8074.50	7813.21	812.75	642.25
SCHEDULED			168.00	160.00	168.00			496.00	8200.00	7988.00	816.00	656.00
VARIANCE			-1.00	-2.75	0.25			-3.50	-125.50	-174.79	-3.25	-13.75
TONS/OPERATING HOUR:												
	#1 FCE.		81.84	85.90	83.54			83.70	83.64	84.29	82.85	85.10
	#2 FCE.		87.62	83.65	84.24			85.18	82.05	83.95	83.71	84.85
	TOTAL		84.87	84.69	83.91			84.48	82.82	84.12	83.29	84.97
STD. 85.8475			85.8475	85.8475	85.8475			85.8475	85.8475	84.8125	85.8475	85.8475
VARIANCE			-0.98	-1.16	-1.94			-1.37	-3.03	-0.69	-2.56	-0.87
TAP TO TAP			2.06	2.07	2.10			2.08	2.09	2.06	2.08	2.05
AVG. HEAT SIZE FCE 1			171.59	172.99	176.38			173.67	172.72	173.41	171.29	174.06
AVG. HEAT SIZE FCE 2			177.96	177.23	176.54			177.25	173.48	172.88	174.93	174.65
AVG. HEAT SIZE			174.97	175.22	176.47			175.56	173.11	173.24	173.12	174.36
CU.FT. LANCE O2/TON HM	#1 FCE.		326.48	279.48	309.70			305.65	310.77	267.39	306.16	321.60
	#2 FCE.		298.02	272.50	308.60			293.40	299.13	276.19	299.27	308.24
CU. FT. BURNER O2/TON HM	#1 FCE.		260.72	240.66	238.71			246.78	277.87	224.05	291.90	285.41
	#2 FCE.		261.36	282.12	283.22			275.32	260.27	239.24	261.17	286.28
Cu. FT. BURNER GAS/TON HM	#1 FCE.		199.37	176.63	179.03			185.08	204.50	172.67	216.67	207.57
	#2 FCE.		196.02	211.59	202.30			203.10	193.22	187.13	197.33	213.81
K.W.H/TON HM (443.4)	#1 FCE.		463.96	449.26	453.65			455.77	450.71	443.10	455.23	450.81
K.W.H/TON HM (443.4)	#2 FCE.		426.46	436.23	435.00			433.14	442.62	444.97	440.62	442.26
TOTAL K.W.H/TON HM			444.79	442.32	443.95			443.72	446.58	444.03	447.80	446.49
LBS TRODES/TON HM (6.5)	#1 FCE.		7.75	6.76	6.28			6.93	6.48	6.61	6.51	6.97
LBS TRODES/TON HM (6.5)	#2 FCE.		6.24	7.13	6.44			6.59	6.23	6.43	6.60	6.82
TOTAL TRODES/TON HM			6.93	6.96	6.36			6.75	6.35	6.52	6.55	6.89
DELAYS												
	% MECHANICAL		0.10	0.85	1.39			0.78	0.48	0.54	1.08	0.64
	% ELECTRICAL		0.40	0.53	0.35			0.42	0.47	0.62	0.87	0.27
	% SHOP		4.59	8.06	5.25			5.92	4.52	5.32	5.18	6.84
	% POWER DEMAND		0.18	0.53	0.72			0.48	0.33	0.18	0.23	0.14
	% SCRAP		2.00	0.95	1.63			1.54	2.18	1.43	1.80	1.44
	% 1 FCE. OPERATION		1.20	0.58	0.84			0.88	1.09	0.84	0.81	0.67
	% OTHER		0.00	0.00	0.00			0.00	0.00	0.00	0.00	0.00
	% TOTAL		8.46	11.50	10.18			10.02	9.07	8.93	9.97	10.00
SCED. HEAT PERF.												
	COMPOSITE % OK		90.48	80.00	87.50			85.48	81.82	88.02	83.78	66.67
	ALL HEATS		77.78	72.37	53.75			67.93	76.68	82.39	77.24	80.51
CHEMISTRY PERF.												
	COMPOSITE # HTS		10	15	10			35	647	713	62	27
	COMPOSITE # OK		80.00	86.67	90.00			85.71	92.58	93.41	98.39	96.30
	ALL HTS # HEATS		81	76	80			237	3863	3794	391	313
	ALL HTS % OK		91.36	92.11	88.75			90.72	95.96	92.99	97.70	97.12

CASTER

WEEK	1	2	3	4	5	MTD	YTD-93	CY-92	FY 93-10	FY 93-11
HOT METAL INTENDED	14308	13622	14117			42047	674219	661219	68236	55149
HOT METAL CHARGE	14173	13317	14117			41607	666709	657259	67691	54574
HOT METAL ABORTED FCE 2.	0	90	0			90	2190	1960	25	220
HOT METAL ABORTED FCE 1.	135	215	0			350	3320	2000	520	355
HOT METAL ABORTED TOTAL	135	305	0			440	5510	3960	545	575
BILLETS PRODUCED:										
ACTUAL	13729	12762	13622			40114	643535	631952	65206	52632
PLAN	13000	13000	13000			39000	650000	640000	65000	52000
VARIANCE	729	-238	622			1114	-6465	-8048	206	632
YIELD % 96.1	96.87	95.84	96.49			96.41	96.24	96.15	96.33	96.44
HOURS WORKED										
ACTUAL	167.04	156.96	168.24			492.24	8047.76	7784.16	808.88	638.16
SCHEDULED	168.00	160.00	168.00			496.00	8208.00	7988.00	816.00	656.00
VARIANCE	-0.96	-3.04	0.24			-3.76	-160.24	-203.84	-7.12	-17.84
TONS/OPERATING HOUR:										
ACTUAL	82.19	81.31	80.97			81.49	79.96	81.18	80.61	82.47
STD. (82.5)	82.50	82.50	82.50			82.50	82.50	81.25	82.50	82.50
VARIANCE	-0.31	-1.19	-1.53			-1.01	-2.54	-0.07	-1.89	-0.03
TONS/OPERATING TURN (660)	658	650	648			652	640	649	645	660
TONS/SCHED. TURN (650)	654	638	649			647	627	633	639	642
% OK TEMPS	74.07	68.42	67.50			70.04	73.08	62.41	66.75	68.05
HEATS/TURN										
5"	3.88	3.87	3.80			3.85	3.84	3.90	3.87	3.92
TONS/HEAT										
5"	169.50	167.93	170.28			169.26	166.59	166.57	166.77	168.15
CU.FT. CASTER O2/TON PRODUCTION	14.89	14.61	14.88			14.79	NA		14.50	15.40
SCRAP TONS	443	555	495			1493	25174	25307	2485	1942
%SCRAP/HM CHARGED	3.13	4.16	3.51			3.59	3.76	3.85	3.67	3.56
%CAST/HM INTENDED	95.96	93.69	96.49			95.40	95.45	95.57	95.56	95.44
%SHROUDED	85.52	85.80	85.41			85.57	85.49	85.70	85.49	85.52
%ABORTED DUE TO:										
A.S. TEMP	0.00	0.73	0.00			0.24	0.13	0.10	0.07	0.38
NON-START	0.00	0.00	0.00			0.00	0.00	0.00	0.00	0.00
A.S. PRACTICE	0.94	0.00	0.00			0.32	0.14	0.15	0.00	0.11
TIMING	0.00	0.00	0.00			0.00	0.00	0.00	0.00	0.00
CASTER OPER.	0.00	0.00	0.00			0.00	0.18	0.10	0.15	0.43
MAINT-ELEC	0.00	0.84	0.00			0.27	0.07	0.06	0.00	0.13
MAINT-MECH	0.00	0.00	0.00			0.00	0.10	0.10	0.57	0.00
OTHER	0.00	0.66	0.00			0.21	0.16	0.03	0.00	0.00
TOTAL	0.94	2.24	0.00			1.05	0.79	0.53	0.80	1.04
TONS DISCARDS	352	397	389			1138	19525	19940	1778	1430
%DISCARDS/TON PROD.	2.56	3.11	2.86			2.84	3.03	3.16	2.73	2.72
% 5&6 STRAND FINISH	96.77	96.05	93.75			96.20	96.69	96.84	97.70	95.85
% 6 STRAND FINISH ONLY	93.83	84.21	77.50			85.23	86.65	81.29	88.49	84.98
% FREE OPEN	75.31	85.53	68.75			76.37	79.51	81.60	73.91	76.36

ROD MILL

	WEEK	1	2	3	4	5	MTD	YTD-93	CY-92	FY 93-10	FY 93-11
BILLETS CHARGED											
	# OF BILLETS	7770	7928	6654			22352	355984	328678	34205	27621
	NET TONS	16260	16585	13959			46803	742364	681298	71618	57878
RODS PRODUCED											
	# OF COILS	7657	7805	6515			21977	349353	321944	33530	26991
	NET TONS	15702	16011	13385			45098	715106	654558	68749	55481
	PLAN	12640	12640	12640			37920	629630	658920	63200	49770
	VARIANCE	3062	3371	745			7178	85476	-4362	5549	5711
	YIELD 96.3	96.57	96.54	95.89			96.36	96.33	96.08	95.99	95.86
	EARNED HRS %	100.04	99.54	80.11			93.01	97.65	105.50	95.39	93.10
HOURS WORKED											
	ACTUAL	151.28	155.04	161.04			467.36	7058.40	6322.72	694.64	574.40
	SCHEDULED	152.00	160.00	168.00			480.00	7464.00	6812.00	768.00	608.00
	VARIANCE	-0.72	-4.96	-6.96			-12.64	-405.60	-489.28	-73.36	-33.60
TONS/OPERATING HOUR:											
	ACTUAL	103.80	103.27	83.11			96.49	101.31	103.52	98.97	96.59
	STD. 103.75	103.75	103.75	103.75			103.75	103.75	98.13	103.75	103.75
	VARIANCE	0.05	-0.48	-20.64			-7.26	-2.44	5.40	-4.78	-7.16
TONS/OPERATING TURN (830)		830	826	665			772	811	828	792	773
TONS/SCED TURN (790)		826	801	637			752	766	769	716	730
# SCRAP COILS		27	25	26			78	1628	1883	171	177
`RAPPED		0.35	0.37	0.40			0.37	0.47	0.59	0.51	0.65
. JBBLES		79	77	85			241	3869	4012	386	391
% COBBLES		1.02	0.97	1.28			1.08	1.09	1.22	1.13	1.42
% CONVEYOR COBS		0.33	0.25	0.21			0.27	0.40	0.42	0.45	0.51
% CENTER CUTS		0.60	0.48	0.54			0.54	0.70	0.58	0.73	0.76
GAS: MCF/TONS PROD. (STD. 1.13)		1.17	1.16	1.15			1.16	1.20	1.20	1.19	1.21
GAS: MCF/TONS CHARGED STD. (1.09)		1.13	1.12	1.10			1.12	1.16	1.15	1.15	1.16
OTHER SCRAP COUNT		32	23	7			62	1045	702	89	61
KWH/ROD TON STD. (106.47)		103.12	111.33	101.15			105.45	106.37	106.83	106.55	107.02
DELAYS % TIME WORKED											
	% CONVEYOR STOP	0.68	0.31	0.57			0.52	1.19	0.97	1.26	1.24
	% MECHANICAL	2.70	5.25	1.60			3.17	2.35	2.01	2.75	4.18
	% ELECTRICAL	2.01	0.87	3.21			2.04	2.46	1.89	3.72	2.34
	% PASS CHANGE	2.37	2.20	0.98			1.84	2.73	2.87	3.28	2.94
	% COBBLES	4.47	5.56	5.60			5.22	4.32	4.21	4.38	6.40
	% OTHER	2.52	1.89	20.78			8.61	3.79	3.32	2.69	3.06
	% CHARGE	0.11	0.70	0.00			0.27	0.23	0.17	1.11	0.18
	% REFORM	0.00	0.00	0.00			0.00	0.03	0.04	0.05	0.06
	% QUALITY	0.39	1.16	0.00			0.51	0.45	0.49	0.14	0.88
	% TOTAL	15.25	17.94	32.75			22.17	17.56	15.97	19.38	21.27
TONS R8 SKID REJECTS (ON HOLD)		0	0	0			0	98	36	0	0
TONS R7 SKID REJECTS (SCRAP)		8	14	19			41	409	441	21	17
TOTAL SKIDS REJECTS /TON CHARGED		0.05	0.08	0.14			0.09	0.06	0.06	0.03	0.03

ROD COIL STRAPPING

WEEK	1	2	3	4	5	MTD	YTD-93	CY-92	FY 93-10	FY 93-11
COMPACTOR #4										
TURNS SCHEDULED	19	20	18			57	923.75	825.55	96	72.25
TAPPED TONS	3624	4078	3527			11430	189725	166793	19587	14695
NS PER TURN	201	204	196			201	205	202	204	203
COMPACTOR #1										
TURNS SCHEDULED	0	0	5.5			5.5	128.57	76.39	28.5	13.25
STRAPPED TONS	0	0	981			981	19514	11825	4118	2148
TONS PER TURN	0	0	178			178	152	155	144	162

ROD INSPECTION REPORT

219-250 PROD.									
% OK	92.24	92.815	91.633		92.195	96.08	96.47	95.929	91.673
TONS SCRAPPED	55	40	53		147	3040	3545	339	356
% SCRAPPED	0.444	0.419	0.456		0.441	0.51	0.64	0.591	0.688
TONS DOWNGRADEC	883	630	896		2409	19892	16095	1955	3867
% DOWNGRADED	7.315	6.767	7.911		7.364	3.38	2.89	3.481	7.638
DOWNGRADE REASON									
SLI	594	389	677		1660	9000	8212	596	2422
LAP	80	91	113		285	2240	1584	138	513
FIN	23	0	0		23	271	169	10	16
FLAT	6	2	0		8	95	29	19	8
OFF HOLE	0	6	2		8	64	209	8	25
OTHER	167	136	97		400	7374	5186	1116	798
SMALL	12	6	6		25	849	706	68	84
SCRAP REASON									
LAP	0	0	0		0	6	30	0	0
FIN	0	0	0		0	0	0	3	3
FLAT	0	0	0		0	8	6	0	0
OFF HOLE	0	0	0		0	0	1	0	0
OTHER	0	0	1		1	59	79.1	2	15
SMALL	13	14	10		37	656	662.5	78	80
TANG	13	5	14		32	712	850.5	78	71
251-469 PROD.									
% OK	79.815	84.005	94.882		84.753	91.18	85.07	95.908	73.114
TONS SCRAPPED	2	13	2		17	356	437	21	17
% SCRAPPED	0.055	0.275	0.095		0.158	0.28	0.35	0.158	0.306
TONS DOWNGRADEC	762	707	109		1579	11274	18372	522	1432
% DOWNGRADED	20.131	15.720	5.024		15.089	8.53	14.57	3.937	26.580
DOWNGRADE REASON									
SLI	68	479	72		619	6454	11479	330	1051
LAP	39	95	21		155	1425	1969	72	260
FIN	0	8	2		10	241	470	14	4
FLAT	2	0	0		2	76	50	0	10
OFF HOLE	0	0	0		0	37	64	0	0
OTHER	648	123	14		786	2929	4212	86	101
SMALL	4	2	0		6	111	128	19	6
SCRAP REASON									
LAP	0	0	0		0	4	5	0	0
FIN	0	0	0		0	7	17	0	2
FLAT	0	0	0		0	11	6	0	0
OFF HOLE	0	0	0		0	2	1	1	0
OTHER	0	0	0		0	48	55	0	0
SMALL	1	5	1		7	83	105	8	3
TANG	0	1	0		1	16	28	1	3
TOTAL % OK	89.276	89.954	92.157		90.393	95.18			89.890
TONS SCRAPPED	57	53	55		164	3395			
% SCRAPPED	0.351	0.372	0.397		0.372	0.47			
TONS DOWNGRADEC	1645	1338	1005		3988	31166			
% DOWNGRADED	10.372	9.674	7.445		9.234	4.33			93-11

CS. ANALYSIS REPORT

	WEEK	1	2	3	4	5	MTD	YTD-93	CY-92	FY 93-10	MTD
219	% CS	86.46	87.46	90.71			88.12	92.88	93.12	93.49	85.23
	% IQ	1.73	5.18	1.91			1.04	1.43	3.91	3.47	0.79
	% R1'S	11.43	6.67	6.65			8.42	4.08	2.08	3.74	10.99
	% SCRAP	0.38	0.70	0.73			0.59	0.61	0.90	0.61	0.67
250	% CS		79.28				79.28	90.94	87.49	85.57	94.18
	% IQ		17.91				17.91	4.81	9.52	4.29	0.85
	% R1'S		2.82				2.82	3.85	2.67	9.86	4.40
	% SCRAP		0.00				0.00	0.39	0.32	0.29	0.57
266	% CS	100.00					100.00	98.20			
	% IQ	0.00					0.00	0.00			
	% R1'S	0.00					0.00	1.50			
	% SCRAP	0.00					0.00	0.30			
313	% CS		76.31				76.31	93.70	88.15	100.00	91.40
	% IQ		13.54				13.54	3.21	6.33	0.00	3.17
	% R1'S		9.85				9.85	2.92	5.20	0.00	5.43
	% SCRAP		0.31				0.31	0.17	0.32	0.00	0.00
297	% CS										
	% IQ										
	% R1'S										
	% SCRAP										
344	% CS		94.29				94.29	89.41	82.63	100.00	
	% IQ		0.00				0.00	6.27	11.70	0.00	
	% R1'S		5.71				5.71	23.92	5.67	0.00	
	% SCRAP		0.00				0.00	0.00	0.00	0.00	
281	% CS	90.07		80.09			85.80	94.89	90.15	95.51	97.56
	% IQ	6.03		9.48			7.51	2.53	7.17	0.90	0.00
	% R1'S	3.90		10.43			6.69	0.00	2.18	2.69	2.44
	% SCRAP	0.00		0.00			0.00	0.14	0.50	0.90	0.00
375	% CS		100.00				100.00	89.37	85.05	91.79	87.50
	% IQ		0.00				0.00	4.62	13.98	3.08	0.00
	% R1'S		0.00				0.00	5.75	20.65	5.13	12.50
	% SCRAP		0.00				0.00	0.26	0.32	0.00	0.00
422	% CS							95.35	76.74		
	% IQ							0.00	24.81		
	% R1'S							97.67	63.57		
	% SCRAP							97.67	176.74		
469	% CS										
	% IQ										
	% R1'S										
	% SCRAP										

27-Jan-97

EXHIBIT II
KEYSTONE STEEL & WIRE
STEEL WORKS HIGHLIGHTS
1994

		94-01	94-02	94-03	94-04	94-05	94-06	94-07	94-08	94-09	94-10	94-11	94-12	Y-T-D
TONS PLANNED														
ARC SHOP		54,610	54,610	54,610	67,929	54,610	54,610	68,595	54,610	54,610	67,929	54,610	40,624	681,956
CASTER		52,480	52,480	52,480	65,280	52,480	52,480	65,920	52,480	52,480	65,280	52,480	39,040	655,360
ROD MILL		56,700	54,270	55,080	71,280	57,510	58,320	71,280	58,320	58,320	66,420	55,890	39,690	703,080
TONS PRODUCED (ACTUAL)														
ARC SHOP		49,310	52,488	55,260	71,509	53,793	51,345	67,795	56,454	53,765	68,808	52,082	40,166	672,773
CASTER		47,296	50,465	53,040	68,763	51,910	49,364	64,990	54,268	51,710	66,139	50,280	38,859	647,083
ROD MILL		52,166	62,316	56,598	71,323	58,183	54,398	63,858	59,559	54,680	74,548	61,409	44,130	713,168
TURNS PLANNED														
ARC SHOP		80.74	80 74	80 74	100.43	80 74	80.74	101.42	80 74	80 74	100.43	80 74	60.06	1008 25
CASTER		80.74	80.74	80 74	100.43	80.74	80 74	101 42	80.74	80 74	100.43	80.74	60 06	1008.25
ROD MILL		67 90	64 99	65.96	85.37	68.87	69.84	85 37	69.84	69.84	79.54	66.93	47 53	842.01
TURNS WORKED (ACTUAL)														
ARC SHOP		81.06	81 53	78 94	101.78	81 69	78.53	102.47	81.63	80.55	99.06	78.06	60.91	1006.21
CASTER		81.17	81 28	78.69	101 22	81 25	78.28	102.34	81.34	80.16	98.49	77.34	60.44	1002.00
ROD MILL		69.61	76.70	67.18	84 11	73.00	73.50	83.95	74.54	70 39	95.18	74 89	53.22	896 27
TONS/TURN	PLAN													
ARC SHOP	676.4	608.3	643.8	700.0	702.6	658.5	653.8	661.6	691 6	667.5	694.6	667 2	659.5	668 6
CASTER	650 0	582.7	620.9	674 0	679.3	638.9	630.6	635.0	667 2	645.1	671.5	650.1	642.9	645 8
ROD MILL	835.0	749 4	812.5	842.5	848 0	797 0	740.1	760.7	799.0	776 8	783.2	820.0	829.2	795.7
SPENDING $														
ARC SHOP														
SPECIAL/CAPITAL		2,786	2,191	3,893	201	1,203	2,271	1,557	19,911	2,289	3,585	7,409	18,034	65,330
SHUTDOWN		52,000	52,000	52,000	65,000	52,000	52,000	65,000	90	47,700	60,000	60,000	25,495	583,285
MANUFACTURING		2,075,477	2,020,531	2,186,456	2,633,172	2,017,437	2,039,408	2,710,055	2,201,878	2,087,065	2,764,742	2,026,032	1,851,468	**********
CASTER														
SPECIAL/CAPITAL		26,929	4,855	34,404	5,854	(9,669)	92	7,454	6,735	2,739	1,586	7,409	410	88,798
SHUTDOWN		52,000	52,000	52,000	65,000	52,000	52,000	65,000	(9,323)	47,700	60,000	60,000	59,403	607,780
MANUFACTURING		867,782	862,413	951,850	1,128,246	872,376	774,839	1,209,654	948,589	926,501	1,220,472	921,296	745,343	**********
ROD MILL														
SPECIAL/CAPITAL		24,798	14,848	9,876	2,098	1,235	1,897	3,050	5,106	1,913	135	6,189	177	71,322
SHUTDOWN		40,000	40,000	40,000	50,000	40,000	40,000	50,000	79,591	39,936	49,170	49,948	29,284	547,929
MANUFACTURING		1,149,826	1,331,521	1,217,422	1,373,982	1,249,866	1,067,721	1,481,214	1,264,177	1,186,390	1,510,942	1,170,501	1,014,059	**********
FIXED EXPENSE		1,357,382	1,198,075	1,186,779	1,368,019	1,159,370	1,213,022	1,404,133	1,239,563	1,244,113	1,462,869	1,170,939	1,138,461	**********
COST/TON PRODUCED														
ARC SHOP MFG. (HM) *		42.09	38.50	39.57	36.82	37.50	39.72	39.97	39.00	38.92	40.18	38 90	46.09	39 56
ARC SHOP TOTAL (HM)		43.20	39.53	40.58	37.73	38.49	40.78	40.96	39.38	39.75	41.10	40 20	47.18	40.52
CASTER MFG. (BILLET) *		18 35	17.09	17.95	16.41	16.81	15.70	18.61	17.48	17.92	18.45	18.32	19.18	17 66
CASTER TOTAL (BILLET)		20.02	18.22	19 57	17.44	17.82	16 75	19.73	17.43	18.89	19.38	19.66	20.72	18.74
ROD MILL MFG. (ROD) *		22.04	21.37	21.51	19.26	21.48	19.63	23.20	21.23	21.70	20.27	19.06	22.98	21 06
ROD MILL TOTAL (ROD)		23.28	22.25	22.39	19 99	22.19	20.40	24.03	22.65	22.46	20 93	19.97	23.65	21.93
FIXED EXPENSE (ROD)		26.02	19.23	20.97	19.18	19.93	22.30	21.99	20 81	22.75	19.62	19.07	25.80	21 23
ROD CONVERSION COST		91.32	84.00	86 71	78.86	82.04	82.21	89.12	83.55	85.11	85.57	83.62	95.51	85 28
YIELD %	PLAN													
ARC SHOP	90.20%	91.57%	89.99%	91.37%	90.79%	90.84%	92.03%	92.29%	91.96%	90 51%	91.38%	91 34%	89.63%	91 19%
CASTER	96.10%	95.92%	96.15%	95.98%	96.16%	96 50%	96.14%	95 86%	96.13%	96 18%	96.12%	96 54%	96.75%	96 18%
ROD MILL	96.70%	95.63%	96.08%	96 16%	96 28%	96.09%	95.72%	95.94%	95 85%	96 13%	96 14%	96 32%	96.69%	96.08%
SCRAP RECOVERY TONS		4,718	4,678	4,518	5,978	4,866	4,745	6,418	5,378	5,237	6,493	4,658	3,422	61,107
USAGE STATS.														
ARC SHOP														
LABOR HOURS/TON		0 0727	0 0668	0 0618	0.0605	0.0659	0.0682	0 0643	0 0615	0 0648	0.0644	0.0665	0 0705	0 0653
KWH/TON (FCS)		441 22	448.58	440.26	437 57	443.09	441.70	442 07	436.99	437.38	431.68	436.82	438.38	439.45
KWH/TON (TOTAL)		500.90	476.29	479 91	474 84	480.85	477 81	478 34	467 97	479 40	470.75	492.90	523.38	482 01
OXYGEN CU.FT/TON (FCS)		286.36	296.40	305 38	300.00	312.09	322 21	257.07	268 47	277 24	278 22	274 71	300 58	288 88
OXYGEN CU.FT/TON (TOTAL)		671 77	638.10	611.55	616 36	594.91	626.43	559.33	576 42	608 53	647.23	604 06	629.24	614 03
ELECTRODE #/TON		7.06	6 32	6.05	6.30	5 70	6 21	5.63	6.31	6.27	6.08	5 82	6 21	6.15
REFRACTORY $/TON		2.97	3.43	3.10	2 50	3.17	2.73	3.28	3 21	3.25	3.46	2 08	4 07	3 09
DUST $/TON		2.34	1 50	1 53	2 15	1.98	2 60	2.24	1.25	1 89	2.15	1 84	2 89	2.02
OTHER MAINT. $/TON *		5.58	4 29	5 22	4 26	4.52	5.80	4.89	4 42	4.15	5 43	5.72	6 31	5 00
CASTER														
LABOR HOURS/TON		0 1387	0.1219	0 1159	0.1142	0 1202	0 1263	0.1193	0 1158	0.1217	0 1161	0 1206	0 1324	0 1212
MAINT $/TON *		5 85	6.39	6 76	5.86	6 59	6.44	6.79	6 55	6.25	6 98	7 62	7.31	6.60
ROD MILL														
LABOR HOURS/TON		0.1911	0 1447	0 1480	0 1430	0 1514	0 1593	0.1682	0 1528	0 1604	0 1513	0 1439	0.1732	0.1561
KWH/TON		98 03	119 30	107 52	103 44	104 38	104 83	101 19	110 87	98 09	104.00	104 63	114 61	105 80
GAS CU FT /TON		1225 10	1131.76	1148 58	1132.75	1123 15	1107 07	745.67	1115.67	1154 65	1156.95	1053.56	1179.55	1102 13
MAINT $/TON *		4.73	5 27	4 87	4.78	5 82	5 16	6 99	5.15	6.04	4.96	4 58	6.87	5 40
LADLES														
MAINT $/TON		3.48	2 05	2 30	2.48	2.20	2.32	3.02	2.66	2 71	3.21	2.53	3 09	2 67
SCRAP														
TONS PURCHASED (KSW)		39701	23960	37482	62403	45030	44001	38471	49598	43271	53331	44090	39105	520442
COST/TON (KSW)		139.05	137 66	135.14	130 79	134 30	117.71	115 40	125 01	130.72	129.69	131.98	133.85	129 77
TONS PURCHASED (SPI)		9584	8596	10434	17873	14098	11861	11904	10487	11168	15372	9896	9115	140386
COST/TON (SPI)		116.46	115.79	112.81	110.64	101.27	87.10	91 85	103 35	110 47	112.33	111.59	111.17	106.72
PURCHASED BILLETS														
TONS		12,910	8,111	8,733	5,296	9,603	9,297	4,183	0	12,817	5,243	10,140	8,416	94,748
COST/TON		249	244	258	252	254	244	238		249	250	250	260	250
INVENTORY ACCURACY														
ROD STORAGE		77 64%	79.87%	85 82%	85 94%	87.44%	91 69%	92 79%	94.92%	91.58%	85.67%	89.29%	98 92%	88.69%
BILLET YARD							89.37%	95.25%	94 92%	98 14%	98 42%	97 69%	100.00%	95 91%
ROD YARD		31.67%	38.07%		38 27%	35.04%	71.93%	88.00%	87.83%	80 25%	85 11%	94.59%	92 97%	67.08%

* COST EXCLUDES SPECIAL EXPENSE & SHUTDOWN
** ROD YARD INVENTORY ACCURACY CONSIDERS ALL DISCREPANCIES INCLUDING COUNT, LOCATION, BANDING, GRADE, ETC.

1994 SCRAP AND ALLOY FORCED CHARGE TONS

	1	2	3	4	5	6	7	8	9	10	11	12	TOTAL 1994
H B IRON			543.60	1,000.20	1,714.18	926.18	325.90	1,440.43	1,389.85	563.90	0.00	189.98	8,094.21
IRON	190.04	540.81	2,735.78	781.64	344.71	278.02	132.98	0.00	0.00	(19.38)	19.38	94.70	5,098.68
BORINGS	0.00	0.00	34.70	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	34.70
SHRED	17,826.59	19,116.63	15,760.68	24,928.43	18,066.26	18,781.96	23,950.89	24,666.97	19,982.78	25,777.11	19,728.79	15,327.37	243,914.45
#2 HEAVY MELT	1,822.53	1,366.35	1,548.33	963.63	1,483.48	1,465.43	1,746.68	1,010.06	1,015.00	1,244.71	1,449.18	854.08	15,969.44
#1 HEAVY MELT	9,296.11	12,997.29	15,396.14	19,263.21	11,287.67	10,004.62	14,204.46	13,051.13	12,151.60	16,195.21	14,404.04	9,049.62	157,301.06
FACTORY BDLS	7,042.65	6,222.79	6,508.62	8,788.48	6,484.43	7,324.62	9,291.76	4,677.58	5,480.11	8,426.41	5,729.47	5,246.38	81,223.29
HI DENSITY	3,541.43	2,525.58	1,641.70	2,939.48	3,585.43	3,091.72	4,440.32	2,809.70	3,963.06	5,682.51	2,523.41	3,654.54	40,398.86
DEALER BDLS	1,871.41	1,669.92	1,751.08	2,772.03	2,876.39	2,513.16	2,936.20	1,613.23	2,162.88	2,362.36	2,292.78	1,394.91	26,216.34
BUSHELING	4,977.03	4,739.45	5,513.94	7,116.67	5,473.39	4,685.60	6,013.31	4,598.75	6,225.45	6,405.11	3,948.60	4,685.31	64,382.61
HOBS	0.00	1,421.58	1,829.52	2,033.05	436.63	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5,720.77
TURNINGS	578.61	409.38	369.16	352.16	927.51	305.73	1,057.03	304.10	162.75	454.50	156.58	348.31	5,425.80
TOTAL PURCHASED	47,146.39	51,009.78	53,633.24	70,938.96	52,680.06	49,377.04	64,099.53	54,171.93	52,533.46	67,092.43	50,252.22	40,845.17	653,780.20
WIRE BLOCKS	1,432.53	2,344.33	1,658.25	1,990.55	1,421.23	1,708.10	2,617.73	1,291.35	1,852.23	1,653.50	1,476.40	782.38	20,228.57
PIT SCRAP UNPREP	1,481.06	1,543.98	1,351.11	1,108.90	867.93	655.30	1,391.40	1,007.28	1,128.15	1,164.80	891.53	725.15	13,316.59
SKULLS UNPREPARED				63.40	41.50	36.80	733.75	585.35	818.60	820.75	719.40	535.45	4,355.00
PIT SCRAP PREPARE	1,717.91	1,487.75	1,445.04	932.64	1,017.02	682.48	1,243.00	1,116.78	884.30	1,412.48	854.43	513.38	13,307.19
SKULLS PREPARED				699.21	420.91	659.22	801.49	518.53	759.90	773.25	851.80	463.08	5,947.38
BILLETS	1,408.36	1,599.97	1,896.81	1,822.60	1,483.63	1,240.20	2,087.91	1,764.53	1,395.11	1,864.61	1,279.68	1,050.41	18,893.80
COBBLE, WIRE	1,770.08	1,540.97	1,455.73	1,848.49	1,790.66	1,802.51	2,114.09	2,174.80	1,591.10	2,049.51	1,986.75	928.68	21,053.37
TOTAL REVERT	7,809.94	8,517.00	7,806.94	8,465.79	7,042.88	6,784.61	10,989.37	8,458.62	8,429.38	9,738.89	8,059.99	4,998.51	97,101.90
TOTAL SCRAP	54,956.33	59,526.78	61,440.18	79,404.76	59,722.94	56,161.64	75,088.89	62,630.55	60,962.84	76,831.31	58,312.21	45,843.68	750,882.09
FERRO BORON	8.80	4.85	6.60	11.79	11.00	11.00	11.00	4.40	11.00	15.40	6.60	6.60	109.04
SILICO MANG.	255.70	257.38	300.43	358.82	297.25	224.83	350.63	233.80	296.42	307.85	254.75	119.58	3,257.44
FE SIL. 50%	111.25	80.30	84.26	157.05	92.30	88.20	133.13	110.52	80.00	126.49	57.08	103.22	1,223.80
LOW FCE COKE	326.23	338.93	311.95	476.35	311.90	419.18	327.89	307.97	195.12	354.58	328.16	189.50	3,887.76
HI FCE COKE	(6.00)	18.00	(8.00)	13.00	(7.00)	(8.00)	5.00	12.00	(6.00)	9.00	(13.00)	5.00	14.00
TOTAL ALLOYS/ADDI	695.98	699.46	695.24	1,017.01	705.45	735.21	827.65	668.69	576.54	813.32	633.59	423.90	8,492.04
GRAND TOTAL	55,652.31	60,226.24	62,135.42	80,421.77	60,428.39	56,896.85	75,916.54	63,299.24	61,539.38	77,644.63	58,945.80	46,267.58	759,374.13

ARC SHOP RECOVERIES
CY 94

	94-01	94-02	94-03	94-04	94-05	94-06	94-07	94-08	94-09	94-10	94-11	94-12	Total Tons	%
Actual Tons Charged	53,851.02	58,325.33	60,480.36	78,760.12	59,214.06	55,793.57	73,458.50	61,386.64	59,403.51	75,295.51	57,019.71	44,812.48	737,800.81	98.93%
SKULLS	550.47	623.22	455.03	772.33	583.05	649.25	867.13	573.22	660.98	790.19	798.46	571.82	7,895.15	1.07%
Pit Scrap	358.48	471.28	240.83	462.50	405.33	195.50	528.00	334.97	683.15	548.60	239.43	396.45	4,864.52	0.66%
Loss Weight	3,632.57	4,742.93	4,524.75	6,016.71	4,432.83	3,604.10	4,268.20	4,024.53	4,294.50	5,148.90	3,899.87	3,677.84	52,267.73	7.08%
Net Hot Metal Prod.	49,309.50	52,487.90	55,259.75	71,508.58	53,792.85	51,344.72	67,795.17	56,453.92	53,764.88	68,807.82	52,081.95	40,166.37	672,773.41	91.19%

CASTER RECOVERIES
CY 94

	94-01	94-02	94-03	94-04	94-05	94-06	94-07	94-08	94-09	94-10	94-11	94-12	Total Tons	%
Gross Metal Tons Charged	49,309.50	52,487.90	55,259.75	71,508.58	53,792.85	51,344.72	67,795.17	56,453.92	53,764.88	68,807.82	52,081.95	40,166.37	672,773.41	100.00%
Crops	46.00	45.90	56.31	63.40	41.50	36.80	62.76	46.00	42.80	49.70	42.10	25.00	558.27	0.08%
Scrap Billets	1,376.24	1,411.32	1,537.51	1,818.01	1,191.95	1,302.81	1,923.50	1,467.71	1,386.98	1,747.27	1,127.82	860.29	17,151.41	2.55%
Pit Scrap	503.80	471.60	527.50	736.40	552.80	549.80	698.40	572.31	530.00	751.20	539.60	351.20	6,784.61	1.01%
Mill Scale	87.80	94.06	98.25	127.73	96.70	91.48	120.47	100.40	95.19	121.05	92.17	70.60	1,195.90	0.18%
Loss Weight	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
Net Production	47,295.66	50,465.01	53,040.18	68,763.03	51,910.10	49,363.83	64,990.04	54,267.50	51,709.91	66,138.60	50,280.26	38,859.28	647,083.40	96.18%

TO

R. SINGER	T. SUBBERT	G. WOODEN
J. KAUFFMAN	R. WITZIG	B. BARDWELL
E. CAMPBELL	R. STRANZ	J. TALAB
D. HOGUE	S. MORROW	R. JAY
E. MATTHEWS	L. HEIT	L. LANGLEY
J. NORTHRUP	G. DEAN	F. FARISCHON
K. KOSEY	D. FOSTER	R. SOMMERS
T. OLSON	J. DONAHUE	M. SAVOIE

WEEKLY

S.W. PRODUCTION STATISTICAL

REPORT

FISCAL PERIOD	94-12	FINAL
MONTH	DECEMBER	
WEEK NO.	4	

PREPARED BY:
K. WHITE
S.W. ACCOUNTING

ARC SHOP

		WEEK 1	2	3	4	5	MTD	YTD-94	CY-93	FY 94-10	FY 94-11
CHARGE		15232	14037	15898			45167	738155	742118	75296	57020
PROD.	#1 FCE.	6113	6526	7676			20314	331949	327136	34174	25928
	#2 FCE.	7446	5965	6441			19852	340825	341573	34634	26154
	TOTAL	13559	12491	14117			40166	672773	668709	68808	52082
PLAN		13985	13319	13319			40624	681956	676377	67929	54610
VARIANCE		-427	-828	797			-458	-9183	-7668	879	-2528
YIELD 90.20		89.01	88.99	88.80			88.93	91.14	90.11	91.38	91.34
FCE HRS.	#1 FCE.	69.33	75.58	92.17			237.08	3940.64	3911.42	390.42	301.24
	#2 FCE.	96.67	76.67	76.83			250.17	4109.01	4163.08	402.08	323.26
	TOTAL	166.00	152.25	169.00			487.25	8049.65	8074.50	792.50	624.50
SCHEDULED		168.00	160.00	168.00			496.00	8192.00	8200.00	816.00	656.00
VARIANCE		-2.00	-7.75	1.00			-8.75	-142.35	-125.50	-23.50	-31.50
TONS/OPERATING HOUR:											
	#1 FCE.	88.17	86.34	83.28			85.69	84.24	83.64	87.53	86.07
	#2 FCE.	77.02	77.81	83.83			79.35	82.95	82.05	86.14	80.91
	TOTAL	81.68	82.04	83.53			82.43	83.58	82.82	86.82	83.40
STD. 84.55		84.55	84.55	84.55			84.55	84.55	85.85	84.55	84.55
VARIANCE		-2.87	-2.51	-1.02			-2.12	-0.97	-3.03	2.27	-1.15
TAP TO TAP		2.21	2.18	2.14			2.18	2.14	2.09	2.07	2.13
AVG. HEAT SIZE FCE 1		179.80	181.27	178.50			179.77	178.85	172.72	178.92	178.81
AVG. HEAT SIZE FCE 2		181.60	175.46	178.92			178.85	178.82	173.48	180.38	176.72
AVG. HEAT SIZE		180.78	178.45	178.69			179.31	178.64	173.11	179.65	177.75
CU.FT. LANCE O2/TON HM	#1 FCE.	245.85	295.05	324.27			291.29	289.38	310.77	276.64	272.44
	#2 FCE.	297.63	323.13	312.45			310.10	288.40	299.13	279.78	276.95
CU. FT. BURNER O2/TON HM	#1 FCE	278.09	291.16	286.62			285.51	264.50	277.87	289.69	293.12
	#2 FCE	308.91	217.92	108.68			216.60	277.56	260.27	314.72	298.23
CU. FT. BURNER GAS/TON HM	#1 FCE	229.02	229.86	221.48			226.44	196.11	204.50	216.54	219.84
	#2 FCE	228.33	184.39	77.63			166.23	203.92	193.22	207.89	225.59
K.W.H/TON HM (445)	#1 FCE	437.33	423.75	430.74			430.48	440.65	450.71	432.64	434.73
K.W.H/TON HM (445)	#2 FCE	433.46	460.87	448.19			446.48	438.28	442.62	430.75	438.88
TOTAL K.W.H/TON HM		435.20	441.48	438.70			438.38	439.45	446.58	431.68	436.82
LBS TRODES/TON HM (6.25)	#1 FCE	7.84	5.39	6.66			6.61	6.26	6.48	6.17	6.03
LBS TRODES/TON HM (6.25)	#2 FCE	4.72	7.50	5.46			5.80	6.04	6.23	5.98	5.61
TOTAL TRODES/TON HM		6.13	6.40	6.11			6.21	6.15	6.35	6.08	5.82
DELAYS											
	% MECHANICAL	0.65	0.11	0.39			0.39	0.47	0.48	0.25	0.64
	% ELECTRICAL	0.25	1.81	0.59			0.88	0.67	0.47	0.69	0.92
	% SHOP	2.91	4.00	2.66			3.16	3.09	4.52	2.91	2.01
	% POWER DEMAND	0.28	0.19	0.36			0.28	0.42	0.33	0.23	0.13
	% SCRAP	1.00	2.24	2.61			1.95	1.93	2.18	2.19	2.38
	%CAS INT. OPER.	0.09	0.41	0.39			0.29	0.90	NA	0.60	0.67
	%CAS INT. MECH.	3.06	0.86	0.10			1.35	0.68	NA	0.99	0.71
	%CAS INT. ELEC.	0.00	0.00	0.00			0.00	0.21	NA	0.00	0.16
	%CAS INT. ARC SH	0.76	0.80	1.04			0.87	0.93	NA	1.17	0.74
	% 1 FCE. OPERATIO	2.11	0.11	2.12			1.49	1.60	1.09	0.79	1.65
	% OTHER	0.25	0.22	0.00			0.15	0.38	0.00	0.00	0.32
	% TOTAL	11.38	10.75	10.27			10.80	11.28	9.07	9.82	10.34
SCED. HEAT PERF.											
	COMPOSITE % OK	80.00	90.48	93.33			89.13	84.98	81.82	70.83	90.32
	ALL HEATS	89.33	82.86	82.28			84.82	81.17	76.68	83.81	78.50
CHEMISTRY PERF.											
	COMPOSITE # HTS	11.00	10.00	9.00			30.00	435.00	647.00	39.00	21.00
	COMPOSITE # OK	81.82	100.00	88.89			90.00	95.86	92.58	89.74	100.00
	ALL HTS # HEATS	75.00	70.00	79.00			224.00	3766.00	3863.00	383.00	293.00
	ALL HTS % OK	96.00	98.57	97.47			97.32	95.06	95.96	95.04	96.93
SCRAP CHARGE DESIGN PERF.											
HIT % CHARGE VS FINISH(75.0)		85.33%	92.66%	91.14%			89.73%	82.37%	NA	81.20%	87.37%

	CASTER									
WEEK	1	2	3	4	5	MTD	YTD-94	CY-93	FY 94-10	FY 94-11
HOT METAL INTENDED	13569	12668	14117			40351	679245	674219	69198	52822
HOT METAL CHARGE	13559	12491	14117			40168	672773	668709	68808	52082
HOT METAL ABORTED FCE 2.	0.00	175.00	0.00			175.00	3200.00	2190.00	0.00	460.00
HOT METAL ABORTED FCE 1.	10.00	0.00	0.00			10.00	3272.00	3320.00	390.00	280.00
HOT METAL ABORTED TOTAL	10.00	175.00	0.00			185.00	6472.00	5510.00	390.00	740.00
BILLETS PRODUCED:										
ACTUAL	13163	12058	13638			38859	647083	643535	66139	50280
PLAN	13440	12800	12800			39040	655360	650000	65280	52480
VARIANCE	-277	-742	838			-181	-8277	-6465	859	-2200
YIELD % 96.1	97.08	96.53	96.61			96.75	96.18	96.24	96.12	96.54
HOURS WORKED										
ACTUAL	166.00	148.24	169.28			483.52	8016.00	8047.76	787.92	618.72
SCHEDULED	168.00	160.00	168.00			496.00	8192.00	8208.00	816.00	656.00
VARIANCE	-2.00	-11.76	1.28			-12.48	-176.00	-160.24	-28.08	-37.28
TONS/OPERATING HOUR:										
ACTUAL	79.30	81.34	80.56			80.37	80.72	79.96	83.94	81.26
STD. (81.25)	81.25	81.25	81.25			81.25	81.25	82.50	81.25	81.25
VARIANCE	-1.95	0.09	-0.69			-0.88	-0.53	-2.54	2.69	0.01
TONS/OPERATING TURN (650)	634	651	645			643	646	640	672	650
TONS/SCHED. TURN (640)	627	603	649			627	632	627	648	613
% OK TEMPS	66.67	67.14	62.03			65.18	72.65	73.08	74.41	67.58
HEATS/TURN										
5"	3.61	3.78	3.73			3.71	3.76	3.84	3.89	3.79
AVG. TONS/HEAT										
5"	175.51	172.26	172.63			173.48	171.82	168.59	172.69	171.60
CU.FT. CASTER O2/TON PRODUCTION	15.91	15.18	16.15			15.77	15.02	NA	15.79	15.86
SCRAP TONS	395	433	479			1307	25690	25174	2669	1802
%SCRAP/HM CHARGED	2.92	3.47	3.39			3.25	3.82	3.76	3.88	3.46
%CAST/HM INTENDED	97.01	95.20	96.61			96.30	95.27	95.45	95.58	95.19
%SHROUDED	85.76	85.87	85.38			85.66	85.91	85.49	85.74	85.61
%ABORTED DUE TO:										
A.S. TEMP	0.00	0.00	0.00			0.00	0.38	0.13	0.00	0.66
NON-START	0.00	0.00	0.00			0.00	0.00	0.00	0.00	0.00
A.S. PRACTICE	0.00	0.00	0.00			0.00	0.16	0.14	0.22	0.37
TIMING	0.00	0.00	0.00			0.00	0.00	0.00	0.00	0.00
CASTER OPER.	0.00	0.00	0.00			0.00	0.11	0.18	0.00	0.14
MAINT-ELEC	0.00	0.00	0.00			0.00	0.03	0.07	0.00	0.00
MAINT-MECH	0.07	1.38	0.00			0.46	0.09	0.10	0.00	0.23
OTHER	0.00	0.00	0.00			0.00	0.14	0.16	0.35	0.00
TOTAL	0.07	1.38	0.00			0.46	0.90	0.79	0.56	1.40
TONS DISCARDS	280	267	313			860	17151	19525	1747	1128
%DISCARDS/TON PROD.	2.13	2.21	2.30			2.21	2.65	3.03	2.64	2.24
% 5&6 STRAND FINISH	98.67	98.57	100.00			99.11	97.37	96.69	98.17	97.61
% STRAND FINISH ONLY	89.33	90.00	92.41			90.63	88.36	86.65	91.12	87.71
% TREE OPEN	69.33	74.29	78.48			74.11	67.70	79.51	67.36	75.43
NITROGEN/TON PRO.	299.55	307.74	339.35			318.06	329.39	NA	315.27	321.08

ROD MILL

	WEEK	1	2	3	4	5	MTD	YTD-94	CY-93	FY 94-10	FY 94-11
BILLETS CHARGED											
	# OF BILLETS	7054	7570	7130			21754	353503	355984	36937	30454
	NET TONS	14792	15988	14860			45641	742246	742364	77543	63757
RODS PRODUCED											
	# OF COILS	6,936	7,445	7,015			21396	346,074	349,353	36132	29903
	NET TONS	14288	15452	14390			44130	713168	715106	74548	61409
	PLAN	14580	12960	12150			39690	703080	629630	66420	55890
	VARIANCE	-292	2492	2240			4440	10088	85476	8128	5519
	YIELD 96.7	96.59	96.65	96.84			96.69	96.08	96.33	96.14	96.32
	EARNED HRS %	96.56	99.87	101.55			99.31	95.29	97.65	93.80	98.20
HOURS WORKED											
	ACTUAL	141.76	148.24	135.76			425.76	7170.16	7058.40	761.44	599.12
	SCHEDULED	152.00	144.00	144.00			440.00	7384.00	7464.00	784.00	624.00
	VARIANCE	-10.24	4.24	-8.24			-14.24	-213.84	-405.60	-22.56	-24.88
TONS/OPERATING HOUR:											
	ACTUAL	100.79	104.24	106.00			103.65	99.46	101.31	97.90	102.50
	STD. 104.375	104.38	104.38	104.38			104.38	104.38	103.75	104.38	104.38
	VARIANCE	-3.59	-0.14	1.62			-0.72	-4.91	-2.44	-6.47	-1.88
TONS/OPERATING TURN (835)		806	834	848			829	796	811	783	820
S/SCED TURN (810)		752	858	799			802	773	766	761	787
# SCRAP COILS		40.00	55.00	40.00			135.00	2556.00	1628.00	304.00	188.00
% SCRAPPED		0.57	0.74	0.57			0.63	0.73	0.47	0.83	0.62
# TOTAL COBBLES		64.00	68.00	55.00			187.00	4189.00	3869.00	390.00	313.00
% TOTAL COBBLES		0.91	0.90	0.77			0.86	1.18	1.09	1.06	1.03
# CONVEYOR COBS		20.00	16.00	20.00			56.00	1541.00	1432.00	173.00	99.00
% CONVEYOR COBS		0.28	0.21	0.28			0.26	0.44	0.40	0.47	0.33
% CENTER CUTS		0.47	0.49	0.71			0.56	0.90	0.70	1.28	0.73
GAS: MCF/TONS PROD. (STD. 1.18)		1.18	1.21	1.15			1.18	1.15	1.20	1.16	1.14
GAS: MCF/TONS CHARGED STD. (1.14)		1.14	1.17	1.11			1.14	1.10	1.16	1.11	1.10
OTHER SCRAP COUNT		14.00	15.00	9.00			38.00	653.00	1045.00	46.00	56.00
KWH/ROD TON STD. (106.47)		116.76	103.28	121.71			113.66	107.64	106.37	107.16	100.63
DELAYS % TIME WORKED											
	% CONVEYOR STO	0.80	1.36	1.41			1.19	1.27	1.19	1.01	0.80
	% MECHANICAL	2.67	1.05	0.69			1.47	2.98	2.35	3.23	2.14
	% ELECTRICAL	1.01	1.00	3.07			1.66	2.31	2.46	2.41	0.86
	% PASS CHANGE	1.88	3.76	1.66			2.46	2.68	2.73	2.63	2.76
	% COBBLES	4.00	4.71	2.41			3.74	4.53	4.32	4.63	5.34
	% OTHER	6.42	3.25	3.84			4.49	4.57	3.79	4.84	4.46
	% CHARGE	0.53	0.11	0.59			0.40	0.22	0.23	0.53	0.08
	% REFORM	0.12	0.00	0.00			0.04	0.06	0.03	0.07	0.00
	% QUALITY	0.53	1.72	0.31			0.87	0.60	0.45	1.07	0.50
	% TOTAL	17.95	16.95	13.97			16.34	19.22	17.56	20.44	16.97
TONS R8 SKID REJECTS (ON HOLD)		0	0	0			0	4	98	0	4
TONS R7 SKID REJECTS (SCRAP)		6	6	0			12	491	409	72	67
TOTAL SKIDS REJECTS /TON CHARGED		0.04	0.04	0.00			0.03	0.07	0.06	0.09	0.11

ROD COIL STRAPPING

WEEK	1	2	3	4	5	MTD	YTD-94	CY-93	FY 94-10	FY 94-11
COMPACTOR #4										
TURNS SCHEDULED	18.00	20.00	18.00	8.00		64.00	956.00	932.75	105.00	80.00
STRAPPED TONS	3798	4194	3678	1656		13325	194812	191577	21414	16627
TONS PER TURN	211	210	204	207		208	204	205	204	208
COMPACTOR #1										
TURNS SCHEDULED	6.00	6.00	5.00	0.00		17.00	155.00	128.57	21.00	8.00
STRAPPED TONS	938	975	838	0		2751	22130	19514	3029	1035
TONS PER TURN	156	162	168	0		162	143	152	144	129

ROD INSPECTION REPORT

219-250 PROD.									
% OK(96.25)	93.19	90.753	95.049		93.242	93.45	96.08	92.768	93.513
TONS SCRAPPED	72	106	84		261	4854	3040	552	360
% SCRAPPED	0.582	1.001	0.567		0.693	0.81	0.51	0.874	0.692
TONS DOWNGRADE	753	846	632		2231	34148	19892	3930	2921
% DOWNGRADED	6.229	8.247	4.384		6.065	5.73	3.38	6.358	5.792
DOWNGRADE REASON									
SLI	106	437	380		922	16064	9000	1340	1323
LAP	14	64	64		142	2964	2240	778	182
FIN	2	6	25		33	250	271	58	19
FLAT	8	0	0		8	295	95	10	0
OFF HOLE	0	0	6		6	122	64	10	0
OTHER	593	310	137		1041	13258	7374	1600	1328
SMALL	29	29	21		78	1196	849	134	70
SCRAP REASON									
LAP	0	0	0		0.00	36.00	6.00	0.00	0.00
FIN	4	0	0		4.00	4.00	0.00	1.00	0.00
FLAT	0	0	0		0.00	14.00	8.00	4.00	0.00
OFF HOLE	0	0	0		0.00	0.00	0.00	0.00	0.00
OTHER	0	24	8		32.00	149.00	59.00	0.00	17.00
SMALL	24	18	22		64.00	1192.00	656.00	124.00	79.00
TANG	6	8	10		24	938.00	712.00	133	75
281-469 PROD.									
% OK	90.371	80.968			63.915	90.206	91.18	92.606	89.009
TONS SCRAPPED	13	11			23	446	355	88	36
% SCRAPPED	0.530	0.202			0.305	0.332	0.28	0.651	0.317
TONS DOWNGRADE	213	963			1176	12010	11274	897	1174
% DOWNGRADED	9.099	18.831			15.781	9.456	8.53	6.743	10.674
DOWNGRADE REASON									
SLI	39	697			737	7909	6454	621	716
LAP	6	222			229	1178	1425	175	168
FIN	0	8			8	219	241	6	40
FLAT	0	0			0	60	76	12	0
OFF HOLE	0	0			0	23	37	0	2
OTHER	166	33			198	2491	2929	70	227
SMALL	2	2			4	130	111	12	21
SCRAP REASON									
LAP	3	0			3	27	4	21	0
FIN	0	0			0	9	7	0	0
FLAT	1	0			1	4	11	0	0
OFF HOLE	0	0			0	0	2	0	0
OTHER	0	0			0	15	48	3	0
SMALL	2	5			7	123	83	16	14
TANG	0	0			0	34	16	2	3
TOTAL % OK	92.732	87.507	95.049		91.505	92.88	95.18	92.569	92.540
TONS SCRAPPED	84	116	84		284	5300	3395	640	396
% SCRAPPED	0.573	0.736	0.567		0.628	0.729	0.47	0.834	0.625
TONS DOWNGRADE	966	1808	632		3407	46157	31166	4827	4095
% DOWNGRADED	6.694	11.758	4.384		7.697	6.383	4.33	6.426	6.661

CS. ANALYSIS REPORT

	WEEK	1	2	3	4	5	MTD	YTD-94	CY-93	FY 94-10	FY 94-11
219	% CS	95.18	81.31	86.45			88.95	96.17	92.88	161.06	92.81
	% IQ	1.49	9.05	5.23			4.50	7.44	1.43	81.86	1.61
	% R1'S	2.46	8.85	7.82			5.83	5.70	4.08	8.47	4.79
	% SCRAP	0.87	0.80	0.51			0.72	0.96	0.61	1.75	0.80
250	% CS		91.97				91.97	92.53	90.94	154.81	96.32
	% IQ		3.28				3.28	11.62	4.81	103.26	0.00
	% R1'S		4.01				4.01	9.08	3.85	30.51	3.24
	% SCRAP		0.73				0.73	0.59	0.39	1.63	0.43
266	% CS							78.40	98.20	98.99	0.00
	% IQ							20.80	0.00	0.00	100.00
	% R1'S							0.80	1.50	1.01	0.00
	% SCRAP							0.00	0.30	0.00	0.00
313	% CS		65.24				65.24	94.30	93.70	158.93	93.07
	% IQ		25.51				25.51	12.96	3.21	93.50	2.67
	% R1'S		9.26				9.26	5.69	2.92	12.99	4.27
	% SCRAP		0.00				0.00	0.24	0.17	0.70	0.00
297	% CS										
	% IQ										
	% R1'S										
	% SCRAP										
344	% CS							97.75	89.41		
	% IQ							0.86	6.27		
	% R1'S							1.21	23.92		
	% SCRAP							0.17	0.00		
281	% CS	99.67	83.33				97.17	92.65	94.89	94.70	83.94
	% IQ	0.33	12.96				2.27	3.62	2.53	2.83	11.44
	% R1'S	0.00	3.70				0.57	3.53	0.00	1.77	4.38
	% SCRAP	0.00	0.00				0.00	0.20	0.14	0.71	0.2[illegible]
375	% CS		27.11				27.11	69.87	89.37	391.30	38.44
	% IQ		59.11				59.11	36.76	4.62	608.70	41.78
	% R1'S		12.89				12.89	8.93	5.75	17.39	19.78
	% SCRAP		0.89				0.89	1.86	0.26	100.00	0.00
422	% CS							97.67	95.35		
	% IQ							4.81	0.00		
	% R1'S							93.94	97.67		
	% SCRAP							0.00	97.67		
469	% CS							100.00			
	% IQ							0.00			
	% R1'S							0.00			
	% SCRAP							0.00			

EXHIBIT II

27-Jan-97

KEYSTONE STEEL & WIRE
STEEL WORKS HIGHLIGHTS
1995

		95-01	95-02	95-03	95-04	95-05	95-06	95-07	95-08	95-09	95-10	95-11	95-12	Y-T-D
TONS PLANNED														
ARC SHOP		53,888	54,553	54,553	67,859	54,553	54,553	68,524	54,553	54,553	67,859	54,553	54,553	694,553
CASTER		51,840	52,480	52,480	65,280	52,480	52,480	65,920	52,480	52,480	65,280	52,480	52,480	668,160
ROD MILL		58,320	59,940	59,940	71,280	59,940	59,940	70,470	58,320	58,320	68,040	55,890	53,460	733,860
TONS PRODUCED (ACTUAL)														
ARC SHOP		54,325	53,593	55,503	67,960	52,166	52,258	62,078	47,802	49,470	60,680	54,263	53,598	663,694
CASTER		52,364	52,057	53,944	66,083	50,856	50,870	60,092	46,410	48,220	58,944	52,746	52,145	644,729
ROD MILL		52,973	56,788	60,923	72,722	59,124	50,477	55,496	41,164	49,643	69,952	53,388	39,621	662,272
TURNS PLANNED														
ARC SHOP		79.75	80.74	80.74	100 43	80.74	80 74	101.42	80.74	80.74	100 43	80.74	80.74	1027.94
CASTER		79.75	80.74	80.74	100 43	80.74	80.74	101.42	80.74	80.74	100.43	80.74	80.74	1027.94
ROD MILL		69 84	71.78	71.78	85.37	71.78	71.78	84 40	69.84	69.84	81.49	66.93	64.02	878.87
TURNS WORKED (ACTUAL)														
ARC SHOP		81.25	79.16	80.75	100.16	81.39	81.22	99 47	77.00	76.41	98 19	81.88	79.63	1016 49
CASTER		80 99	78.97	80.51	99.71	81.19	81.06	99.05	76.69	75.72	97 87	81.59	79.46	1012.81
ROD MILL		67.10	71.46	75.59	93.45	75 48	63.90	68.31	53.33	61.99	84.28	67.66	63.71	846.26
TONS/TURN	PLAN													
ARC SHOP	675.7	668.6	677.0	687 3	678.5	640.9	643.4	624.1	620 8	647.5	618.0	662.8	673.1	652.9
CASTER	650.0	646.5	659 2	670.0	662.7	626.4	627.6	606.7	605.2	636.8	602.3	646.5	656.2	636.6
ROD MILL	835.0	789 5	794.7	806.0	778 2	783.3	789.9	812.4	771 9	800.8	830.0	789.1	621 9	782 6
SPENDING $														
ARC SHOP														
SPECIAL/CAPITAL		6,418	7,497	8,888	14,330	3,892	27,872	(355)	19,488	12,565	166,040	90,719	(33,659)	323,695
SHUTDOWN		47,000	47,000	47,000	59,000	47,000	47,000	49,000	33,200	34,000	42,000	34,000	130,843	617,043
MANUFACTURING		2,034,782	2,011,681	2,150,755	2,613,544	1,999,838	2,089,331	2,690,551	1,912,236	2,039,137	2,533,586	2,053,102	2,295,068	**********
CASTER														
SPECIAL/CAPITAL		30,220	4,325	8,748	2,291	4,970	7,484	570	4,869	0	1,731	15,368	74,520	155,096
SHUTDOWN		47,000	47,000	47,000	59,000	47,000	47,000	59,000	33,200	34,000	42,000	34,000	31,392	527,592
MANUFACTURING		939,862	880,787	939,458	1,200,448	950,320	983,416	1,187,003	905,019	829,464	1,086,970	962,442	1,040,472	**********
ROD MILL														
SPECIAL/CAPITAL		5,444	3,693	7,590	1,953	3,168	3,584	(324)	(183)	19	1,479	13,124	15,449	54,996
SHUTDOWN		47,000	47,000	47,000	59,000	47,000	47,000	59,000	33,207	34,000	42,000	34,000	105,122	601,329
MANUFACTURING		1,152,366	1,232,699	1,283,849	1,539,797	1,257,861	1,214,909	1,312,567	991,767	980,984	1,508,035	1,180,084	1,221,259	**********
FIXED EXPENSE		1,301,094	1,159,438	1,153,456	1,384,765	1,148,889	1,173,459	1,381,684	1,209,758	1,191,221	1,369,781	1,108,935	1,230,305	**********
COST/TON PRODUCED														
ARC SHOP MFG. (HM) *		37.46	37.54	38.75	38 46	38.34	39 98	43.34	40.00	41 22	41.75	37.84	42.82	39.81
ARC SHOP TOTAL (HM)		38.44	38.55	39.76	39.54	39.31	41.41	44.13	41.11	42.16	45.18	40 13	44.63	41.23
CASTER MFG. (BILLET) *		17.95	16.92	17.42	16.17	18.69	19 33	19.75	19.50	17.20	18.44	18.25	19.95	18.47
CASTER TOTAL (BILLET)		19.42	17.91	18.45	19.09	19.71	20.40	20 74	20.32	17.91	19.18	19.18	21 98	19 53
ROD MILL MFG. (ROD) *		21.75	21.71	21.07	21.17	21.28	24.07	23.65	24.09	19.76	21 53	22.10	30 82	22.46
ROD MILL TOTAL (ROD)		22.74	22.60	21.97	22.01	22.12	25.07	24.71	24.90	20.45	22.15	22.99	33.87	23.45
FIXED EXPENSE (ROD)		24.56	20.42	18 93	19.04	19.40	23.25	24.90	29.39	24.00	19.58	20.77	31.05	22.36
ROD CONVERSION COST		84.22	82.24	83 49	83.74	84.46	90.66	93.40	89.97	83.65	90.00	85.51	104.45	87 65
YIELD %	PLAN													
ARC SHOP	91 50%	89.86%	88.99%	93.40%	90.75%	92.47%	88 92%	88.65%	92.69%	93.23%	91.73%	92.25%	91.27%	91.10%
CASTER	96 20%	96.39%	97.13%	97.19%	97.24%	97.49%	97 34%	96.80%	97.09%	97.47%	97.14%	97.20%	97.29%	97.14%
ROD MILL	96.30%	96.46%	96.58%	96.49%	96.80%	96.31%	95.97%	96 57%	96.29%	96.77%	96.83%	96.72%	96.15%	96.52%
SCRAP RECOVERY TONS		4,272	4,066	4,030	4,661	3,185	4,109	4,663	3,785	3,595	4,058	3,805	3,870	48,099
USAGE STATS.														
ARC SHOP														
LABOR HOURS/TON		0 0642	0.0502	0.0612	0.0628	0.0686	0.0675	0.0720	0.0756	0 0679	0.0700	0.0624	0.0646	0 0655
KWH/TON (FCS)		443.12	434.14	425.82	437 51	454.18	443.85	439.91	438 57	442.01	443.39	441.80	434 79	439.80
KWH/TON (TOTAL)		480.58	490.96	483.56	490 59	505.10	492.61	493 51	494.94	496.61	499.46	493.69	488.43	492.44
OXYGEN CU.FT/TON (FCS)		287.94	269 95	286.71	257 07	237 55	251.64	243.13	245 15	258 64	264.95	279.27	269.14	262.47
OXYGEN CU.FT/TON (TOTAL)		725.72	682.62	623 83	685.36	565.94	673.42	622 24	728 60	684.03	667.87	627.74	642.62	660.32
ELECTRODE #/TON		6 18	5.61	6 19	5.65	5.25	6.00	6.33	6.55	7.11	7 29	6 76	7.19	6.41
REFRACTORY $/TON		2.11	2.88	3.15	3.38	4.72	2.54	4.93	2 45	2.97	3.54	3.13	3.58	3.31
DUST $/TON		1.92	2.30	2.40	2.92	1.59	1 98	2 78	1 78	2.87	3.12	1.84	2.46	2.36
OTHER MAINT. $/TON *		4.44	4.89	4.81	3.63	4.10	4.79	4 97	5.08	5.75	5.33	3.95	4.34	4 65
CASTER														
LABOR HOURS/TON		0.1267	0.1206	0.1168	0.1183	0.1250	0.1256	0 1263	0 1328	0 1261	0.1279	0.1176	0.1244	0 1238
MAINT $/TON *		7.25	6 83	6.16	6.66	7 50	7.24	7 38	7 21	7.32	7 82	7.47	8.87	7.30
ROD MILL														
LABOR HOURS/TON		0.1911	0.1596	0 1512	0.1549	0.1505	0.1592	0 1597	0 1682	0.1650	0.1545	0.1576	0.2258	0 1642
KWH/TON		104 97	110.90	106.88	106 75	104.71	104 60	105.94	110 65	105.20	103.12	106.94	125.94	107 47
GAS CU FT./TON		1224.09	1198 41	1176.43	1177 83	1342.66	1047.12	1174 08	1208.56	1190 63	1175 76	1195.63	1196 75	1192 82
MAINT $/TON *		5.76	5.75	5.56	5.41	5.88	7 53	6.78	7 50	4 81	6 43	6 03	11.34	6 40
LADLES														
MAINT $/TON		2 12	3.41	2.76	2 65	2.54	3 02	2.24	3 30	2 40	2.46	2.17	2 58	2.63
SCRAP														
TONS PURCHASED (KSW)		43800	36694	37774	48505	42622	39989	54132	40208	25664	51289	30702	50085	501463
COST/TON (KSW)		136.08	135.06	131 54	129 97	132.49	134.68	134 27	135.75	136.52	133 93	131.37	129.30	133 27
TONS PURCHASED (SPI)		9984	10701	12635	13670	10859	9908	11888	12201	13673	16434	9294	11606	142662
COST/TON (SPI)		117.98	115.42	107 87	105 79	108.44	106.70	103.03	113.15	118.79	115.28	107.61	109.18	110 94
PURCHASED BILLETS														
TONS		15,287	4,041	12,256	12,267	6,529	5,928	79				1,092	3,917	61,396
COST/TON		260	272	260	253	256	263	(50)				241	238	257
INVENTORY ACCURACY														
ROD STORAGE		88.67%	88.57%	98.74%	99 07%	92.70%	99 56%	92.73%	99.20%	97 76%	94.20%	99 05%	100 00%	95.86%
BILLET YARD		99 07%	98.48%	95 31%	96 87%	92.75%	98 68%	98.32%	98 78%	97 50%	89.41%	95.24%	100.00%	97 16%
ROD YARD		91 82%	84 85%	94.95%	92.41%	87 27%	86 36%	90.80%	93.33%	94.63%	90.70%	92.98%	100 00%	91 71%

* COST EXCLUDES SPECIAL EXPENSE & SHUTDOWN

** ROD YARD INVENTORY ACCURACY CONSIDERS ALL DISCREPANCIES INCLUDING COUNT, LOCATION, BANDING, GRADE, ETC.

ROD MILL SPENDING AND PRODUCTIVITY VARIANCE ANALYSIS
NOV 95-11 YTD CALENDAR

	YEAR-TO-DATE STD. COST/HR	ACT. COST/HR	SPENDING $ USAGE	PRICE	TOTAL VAR. $	STD COST /TON	ACT COST /TON	VAR COST /TON	YTD ACTUAL EXPENSE
PROD. LABOR	261.42	259.91	13,848	(4,377)	9,471	2.50	2.61	-0.11	1,627,123
NON PR. LABOR	33.27	35.46	(10,110)	(3,572)	(13,681)	0.32	0.36	-0.04	221,965
PREM. PAY	30.42	27.61	17,621	0	17,621	0.29	0.28	0.01	172,921
FRINGES	150.35	154.41	(867)	(24,567)	(25,434)	1.44	1.55	-0.11	943,585
TOTAL LABOR	475.46	477.38	20,492	(32,516)	(12,024)	4.58	4.80	-0.24	2,963,594
LABOR	199.34	196.23	19,471	0	19,471	1.91	1.97	-0.06	1,226,477
MATERIAL	297.51	319.31	(136,467)	0	(136,467)	2.85	3.21	-0.36	1,998,999
GEAR OIL	7.70	9.04	(11,293)	2,891	(8,402)	0.07	0.09	-0.02	50,607
GREASE	1.51	1.65	(2,496)	1,604	(892)	0.01	0.02	-0.00	10,345
HYD FLUID	8.77	15.00	(13,063)	(25,949)	(39,012)	0.08	0.15	-0.07	93,916
V-MILL OIL	9.43	11.30	(7,816)	(3,873)	(11,689)	0.09	0.11	-0.02	70,725
GUIDES	52.31	52.39	(532)	0	(532)	0.50	0.53	-0.03	328,013
SPEC. EXP.	13.80	0.00	86,394	0	86,394	0.13	0.00	0.13	0
SHUTDOWN	82.78	79.26	22,029	0	22,029	0.79	0.80	-0.00	496,207
TOTAL MTCE/CONSUM.	673.16	684.19	(43,774)	(25,327)	(69,100)	6.45	6.88	-0.43	4,283,289
* ELECTRICITY	242.15	237.75	(11,483)	(32,368)	(43,852)	2.32	2.39	-0.07	1,480,408
* GAS	297.93	238.85	(160,752)	442,744	281,992	2.85	2.40	0.45	1,495,319
TOTAL UTILITIES	540.08	476.60	(172,236)	410,376	238,140	5.17	4.79	0.38	2,963,725
TOTAL SUPPLIES	6.35	4.47	11,776	0	11,776	0.06	0.04	0.02	27,978
TOTAL SUPPORT	3.57	4.98	(8,701)	0	(8,701)	0.03	0.05	-0.02	31,050
DIRECT COST/HR	1,698.61	1,647.60	(192,443)	352,534	160,091	16.27	16.57	-0.29	10,314,636
ALLOCATED COSTS									
BILLET YARD	18.72	22.00	(20,514)	0	(20,514)	0.18	0.22	-0.04	137,708
GENERAL WORKS	87.05	60.01	12,284	156,977	169,261	0.83	0.60	0.23	375,706
ROLL SHOP	50.08	42.63	46,623	0	46,623	0.48	0.43	0.05	266,898
* ROLL AMORTIZATION	104.38	99.46	32	0	32	1.00	1.00	0.00	622,650
ROD HANDLING	394.65	394.72	(407)	0	(407)	3.78	3.97	-0.19	2,471,074
TOTAL OTHER MFG.	654.88	618.82	38,019	156,977	194,996	6.27	6.22	0.06	3,874,037
TOTAL COST/HR.	2,353.49	2,266.42	(154,423)	509,511	355,087	22.56	22.79	-0.24	14,188,672

ACT. HRS. WKD.	6260.40	TONS PRODUCED	622,651
PRODUCTIVITY VARIANCE	(503,935)	PLAN TONS	680,400
STD TONS/HR	104.375	VARIANCE TONS	(57,749)

USAGE ANALYSIS $

	STD.	ACT.	VAR.	USAGE $
LABOR:				
PROD LABOR (HRS.)	83,291.49	82,586.75	704.74	13,848
NON PROD (HRS.)	16,412.89	17,209.50	(796.61)	(10,110)
			(91.87)	
UTILITIES:				
* ELECTRIC (KWH)	65,661,430	66,183,400	(521,970)	(11,483)
* GAS (CU.FT.)	680,964,111	742,555,000	(61,590,889)	(160,752)
MAINT MATERIAL				
GEAR OIL	17,654	21,791	(4,137)	(11,293)
GREASE	13,487	17,040	(3,553)	(2,496)
HYD FLUID	37,058	45,873	(8,815)	(13,063)
V-MILL OIL	19,288	21,842	(2,554)	(7,816)
OTHER:				
FRINGE ($)		156,977		(867)

*TONNAGE RELATED COST, USAGE VARIANCE IS CALCULATED BASED ON STANDARD USAGE PER TON.

STATISTICAL DATA

	STD.	ACT.	VAR.
PROD LABOR/HR	13.30	13.19	0.11
NON PROD LABOR/HR	2.62	2.75	-0.13
KWH/ROD TON	105.45	106.29	-0.84

GAS - CU. FT. USAGE ANALYSIS

STD. CU FT/HR	ACTUAL USAGE CU FT/HR	VAR. CU FT/HR	VAR. CU FT	VAR. $
114,160	118,611	(4,461)	(27,929,275)	(72,895)

STD. CU FT/TON	ACTUAL USAGE CU FT/TON	VAR. CU FT/TON	VAR. CU FT USAGE
1,093.85	1,192.57	(98.92)	(61,590,889)

Gear Oil
49-48-0013 55 Gal Drums GAL
0045 Drums

V-mill Oil = Gallons

Grease
49-31-0003 400# Drum LB
-0004
-0040 120# Drum (Ø usage)

Hyd fluid
49-48-0012 55 gal Drum GAL
0040 gal

27-Jan-97

KEYSTONE STEEL & WIRE
STEEL WORKS HIGHLIGHTS
1996

		96-01	96-02	96-03	96-04	96-05	96-06	96-07	96-08	96-09	96-10	96-11	96-12	Y-T-D
TONS PLANNED														
ARC SHOP		53,443	54,103	54,103	67,299	54,103	53,443	67,299	53,443	53,443	67,299	54,103	40,907	672,990
CASTER		51,840	52,480	52,480	65,280	52,480	51,840	65,280	51,840	51,840	65,280	52,480	39,680	652,800
ROD MILL		53,475	55,800	55,800	67,425	55,800	55,800	65,100	55,800	55,800	65,100	55,800	41,850	683,550
TONS PRODUCED (ACTUAL)														
ARC SHOP		43,461	52,295	53,153	65,091	52,378	53,150	66,697	52,892	57,808	73,776	59,805	44,290	674,595
CASTER		41,749	50,579	51,500	63,123	50,782	51,387	64,620	51,276	55,983	71,585	57,993	43,064	653,620
ROD MILL		51,850	50,815	57,879	64,878	54,452	56,940	68,519	53,856	56,701	76,297	57,655	44,223	693,864
TURNS PLANNED														
ARC SHOP		79.75	80.74	80.74	100.43	80.74	79.75	100.43	79.75	79.75	100.43	80.74	61.05	1004.31
CASTER		79.75	80.74	80.74	100.43	80.74	79.75	100.43	79.75	79.75	100.43	80.74	61.05	1004.31
ROD MILL		66.02	68.89	68.89	83.24	68.89	68.89	80.37	68.89	68.89	80.37	68.89	51.87	843.89
TURNS WORKED (ACTUAL)														
ARC SHOP		72.38	81.28	81.88	100.31	80.25	81.38	101.63	81.19	80.19	101.22	81.16	61.53	1004.38
CASTER		71.82	81.08	81.43	99.74	80.03	81.06	101.25	81.08	79.99	101.09	81.03	61.47	1001.07
ROD MILL		70.09	63.40	73.37	84.51	69.50	74.12	88.62	69.57	70.69	91.75	68.12	50.53	874.27
TONS/TURN	PLAN													
ARC SHOP	670.1	600.5	643.4	649.2	648.9	652.7	653.1	656.3	651.5	720.9	728.9	734.5	719.8	671.7
CASTER	650.0	581.3	623.8	632.4	632.9	634.3	633.9	638.2	632.4	699.9	708.1	715.7	700.6	652.9
ROD MILL	810.0	739.8	801.5	788.9	765.3	783.5	788.2	773.2	774.1	802.1	831.6	846.4	875.2	793.6
SPENDING $														
ARC SHOP														
SPECIAL/CAPITAL		40,051	31,217	24,743	2,007	263,180	24,321	91,560	10,669	5,729	51,831	48,729	101,399	695,436
SHUTDOWN		47,000	47,000	47,000	59,000	47,000	47,000	59,000	47,000	47,000	59,000	47,000	79,666	632,666
MANUFACTURING		2,035,489	2,306,910	2,257,750	2,825,392	2,181,318	2,342,047	2,649,451	2,276,204	2,330,259	2,865,264	2,340,681	2,245,397	28,656,162
CASTER														
SPECIAL/CAPITAL		115,074	187,914	(51,422)	55,946	(34,804)	14,211	36,687	7,496	1,934	10,718	10,519	16,954	371,227
SHUTDOWN		47,000	47,000	47,000	59,000	(41,777)	47,000	59,000	47,000	47,000	59,000	47,000	27,468	491,691
MANUFACTURING		1,080,931	740,125	957,195	1,247,944	1,070,049	948,926	1,171,886	987,159	951,092	1,236,568	939,180	977,350	12,308,405
ROD MILL														
SPECIAL/CAPITAL		2,492	1,478	8,207	3,279	13,227	11,654	30,086	6,148	1,585	8,789	8,897	11,757	107,597
SHUTDOWN		47,000	47,000	47,000	59,000	47,000	47,000	59,000	47,000	47,000	59,000	47,000	77,949	630,949
MANUFACTURING		1,279,799	1,190,671	1,261,706	1,625,635	1,267,381	1,311,208	1,736,418	1,277,830	1,288,864	1,691,217	1,253,421	1,113,284	16,297,434
FIXED EXPENSE		1,198,647	1,026,243	1,044,406	1,179,420	1,024,750	1,109,280	1,301,129	1,093,302	1,041,095	1,233,308	1,055,523	962,606	13,269,709
COST/TON PRODUCED														
ARC SHOP MFG. (HM) *	40.46	46.83	44.11	42.48	43.41	41.65	44.06	39.72	43.04	40.31	38.84	39.27	50.70	42.48
ARC SHOP TOTAL (HM)	41.96	48.84	45.61	43.83	44.34	47.57	45.41	41.98	44.13	41.22	40.34	40.88	54.79	44.45
CASTER MFG. (BILLET) *	18.51	25.89	14.63	18.59	19.77	21.08	18.47	18.13	19.25	16.99	17.27	16.19	22.70	18.83
CASTER TOTAL (BILLET)	19.57	29.77	19.28	18.50	21.59	19.57	19.66	19.62	20.31	17.86	18.25	17.19	23.73	20.15
ROD MILL MFG (ROD) *	22.26	24.68	23.43	21.80	25.13	23.28	23.03	25.34	23.73	22.73	22.17	21.74	25.17	23.49
ROD MILL TOTAL (ROD)	23.3	25.64	24.39	22.75	26.10	24.38	24.06	26.64	24.71	23.59	23.05	22.71	27.20	24.55
FIXED EXPENSE (ROD)	22.52	23.12	20.20	18.04	18.24	18.82	19.48	18.99	20.30	18.36	16.16	18.31	21.77	19.12
ROD CONVERSION COST	88.34	109.22	93.35	88.86	96.00	95.91	93.65	92.01	93.09	86.12	84.97	83.80	109.80	93.04
YIELD %	PLAN													
ARC SHOP	90.85%	89.13%	91.26%	91.09%	91.27%	90.62%	91.42%	90.88%	91.12%	91.37%	92.56%	91.94%	93.40%	91.37%
CASTER	97.15%	96.06%	96.72%	96.89%	96.98%	96.91%	96.68%	96.89%	96.94%	96.85%	97.03%	97.29%	97.23%	96.89%
ROD MILL	96.50%	96.45%	96.34%	96.41%	96.30%	95.99%	95.74%	96.30%	96.28%	96.63%	96.61%	96.91%	96.94%	96.40%
SCRAP RECOVERY TONS		4,624	5,636	2,999	4,820	4,127	4,889	5,254	4,277	4,661	5,271	4,135	3,402	54,112
USAGE STATS.														
ARC SHOP														
LABOR HOURS/TON		0.0830	0.0678	0.0665	0.0664	0.0665	0.0679	0.0686	0.0688	0.0641	0.0616	0.0614	0.0642	0.0668
KWH/TON (FCS)		469.52	441.75	428.27	429.88	440.21	438.80	433.59	434.88	415.50	414.93	423.66	428.06	431.95
KWH/TON (TOTAL)		536.78	497.23	481.96	499.72	491.43	499.06	489.43	491.94	468.10	467.02	475.20	483.83	488.70
OXYGEN CU.FT/TON (FCS)		221.92	293.85	285.56	354.68	461.53	443.74	546.58	446.63	553.40	579.21	567.46	543.63	450.25
OXYGEN CU.FT/TON (TOTAL)		637.91	708.37	696.03	679.41	738.04	746.45	810.74	758.51	733.64	743.29	747.33	780.00	733.40
ELECTRODE #/TON		7.20	7.98	6.91	5.96	6.61	6.67	6.23	6.76	6.23	5.54	5.84	6.37	6.46
REFRACTORY $/TON		3.55	1.44	2.89	2.62	4.61	3.61	3.20	4.21	2.10	3.24	3.18	7.88	3.44
DUST $/TON		3.05	0.06	4.21	2.72	1.27	3.17	2.06	1.80	3.68	1.94	2.09	3.10	2.41
OTHER MAINT. $/TON *		5.80	10.02	4.89	6.39	5.01	6.84	4.86	6.60	5.40	5.30	4.64	7.33	6.01
CASTER														
LABOR HOURS/TON		0.1576	0.1245	0.1227	0.1241	0.1252	0.1190	0.1184	0.1197	0.1105	0.1080	0.1060	0.1162	0.1199
MAINT. $/TON *		11.83	3.33	8.33	7.25	7.98	6.95	7.05	7.10	6.47	6.86	6.00	10.17	7.30
ROD MILL														
LABOR HOURS/TON		0.1943	0.1589	0.1552	0.1688	0.1611	0.1591	0.1655	0.1636	0.1540	0.1524	0.1483	0.1682	0.1620
KWH/TON		119.20	111.46	109.87	109.84	105.91	105.09	107.68	107.82	105.86	103.13	109.60	114.27	108.78
GAS CU.FT./TON		1194.46	1170.79	1149.42	1174.10	1176.50	1166.02	1143.50	1127.94	1144.56	1137.66	1137.65	1143.29	1154.83
MAINT $/TON *		5.91	6.50	6.27	6.88	6.51	6.25	8.25	7.07	6.67	5.60	5.72	7.30	6.57
LADLES														
MAINT $/TON		3.08	2.19	2.50	2.78	3.31	3.33	2.78	3.50	2.54	2.61	2.23	3.19	2.81
SCRAP														
TONS PURCHASED (KSW)		49033	42664	31626	43900	41192	29223	44715	50747	45261	51944	44891	36996	512219
COST/TON (KSW)		133.93	136.07	131.39	134.13	133.86	134.24	131.44	133.07	132.08	126.32	119.80	114.31	130.09
TONS PURCHASED (SPI)		11125	10502	13063	14364	11259	10981	12799	12416	14011	15877	10300	5350	142046
COST/TON (SPI)		116.25	117.11	110.68	108.60	112.39	108.34	103.95	108.08	111.11	108.97	96.92	90.65	108.60
PURCHASED BILLETS														
TONS			3,686	162	7,020	5,200	5,071	5,946	4,049	5,193	4,253		5,898	46,478
COST/TON			234	265	237	222	222	214	229	224	236		228	227
INVENTORY ACCURACY														
ROD STORAGE		99.21%	97.80%	98.61%	98.22%	98.86%	97.86%	98.31%	97.41%	98.01%	98.70%	97.90%	100.00%	98.41%
BILLET YARD		98.02%	91.53%	95.68%	96.14%	99.25%	98.35%	97.58%	95.96%	92.86%	97.13%	94.81%	98.57%	96.59%
ROD YARD		89.77%	92.78%	88.06%	90.59%	96.02%	88.01%	90.68%	97.13%	97.62%	87.50%	95.69%	99.44%	92.70%

* COST EXCLUDES SPECIAL EXPENSE & SHUTDOWN

** ROD YARD INVENTORY ACCURACY CONSIDERS ALL DISCREPANCIES INCLUDING COUNT, LOCATION, BANDING, GRADE, ETC

KEYSTONE STEEL & WIRE COMPANY - Peoria, Illinois
Historical NSPS Reconstruction Applicability Analysis
ELECTRIC ARC FURNACE

DATE OF UPGRADE	DESCRIPTION OF UPGRADE	REASON(S) UPGRADE IS NOT INCLUDED IN THE RECONSTRUCTION DETERMINATION	CAP. COST OF UPGRADE	CUMULATIVE COSTS	REFS.
Jun. 1970	Ladle add bin	Original Equipment			
Jun. 1970	Simn & femn weigh hopper	Original Equipment			
Jun. 1970	Calsiloy & fe si weight ho...	Original Equipment			
Jun. 1970	Ferro manganese discharge	Original Equipment			
Jun. 1970	Silico manganese discharge	Original Equipment			
Jun. 1970	Ferro silicon disc chute	Original Equipment			
Jun. 1970	Calsiloy comp discharge c...	Original Equipment			
Jun. 1970	Calsiloy comp disc chute	Original Equipment			
Jun. 1970	Add swing chute	Original Equipment			
Jun. 1970	450 HP-7500 GPM cooling w...	Original Equipment			
Jun. 1970	Ladle cooling fan	Original Equipment			
Jun. 1970	Additive feeder	Original Equipment			
Jun. 1970	Funace ladle bale	Original Equipment			
Jun. 1970	Load cell sys emery	Original Equipment			
Jun. 1970	Electric furnace	Original Equipment	$ 1,651,484		
Jun. 1970	Temp-instrumentation	Original Equipment			
Jun. 1970	Pressure instrumentation	Original Equipment			
Jun. 1970	Flow instrumentation	Original Equipment			
Oct. 1971	1 set hydraulic filters	Not part of a "regulated facility"			
Oct. 1972	Dolomite bin	Not part of a "regulated facility"			

KEYSTONE STEEL & WIRE COMPANY - Peoria, Illinois
Historical NSPS Reconstruction Applicability Analysis
ELECTRIC ARC FURNACE

DATE OF UPGRADE	DESCRIPTION OF UPGRADE	REASON(S) UPGRADE IS NOT INCLUDED IN THE RECONSTRUCTION DETERMINATION	CAP. COST OF UPGRADE	CUMULATIVE COSTS	REFS.
Oct. 1972	Flourspar bin	Not part of a "regulated facility"			
Jan. 1977	Hydraulic test circuit ff	Not part of a "regulated facility"			1
Jan. 1978	Norman manifold T11004 with ...	Not part of a "regulated facility"			1
Jan. 1987	Arc shop elect. bldg. & scrap	Not part of a "regulated facility"			1
Feb. 1988	Concrete slab with security	Not part of a "regulated facility"			1
Feb. 1988	Oxy-fuel burner system	Not replacement of a component of a "regulated facility"			1
Feb. 1988	Oxy-fuel burner system	Not replacement of a component of a "regulated facility"			1
Feb. 1988	Water-cooled bus	Not part of a "regulated facility"			1
Feb. 1988	Water-cooled bus	Not part of a "regulated facility"			1
Feb. 1988	Electrode regulation equipment	Not part of a "regulated facility"			1
Feb. 1988	Electrode regulation equipment	Not part of a "regulated facility"			1
Aug. 1988	Add cost to an oxy-fuel b...	Not replacement of a component of a "regulated facility"			1
Aug. 1988	Add cost to an oxy-fuel b...	Not replacement of a component of a "regulated facility"			1
Aug. 1988	Add cost to the electrode	Not part of a "regulated facility"			1
Aug. 1988	Add cost to the electrode	Not part of a "regulated facility"			1
Dec. 1988	Add cost to an oxy-fuel b...	Not part of a "regulated facility"			1
Dec. 1988	Add cost to an oxy-fuel b...	Not part of a "regulated facility"			1
Jan. 1990	Baghouse fan HP increased	Baghouse not a "regulated facility,"			1

KEYSTONE STEEL & WIRE COMPANY - Peoria, Illinois
Historical NSPS Reconstruction Applicability Analysis
ELECTRIC ARC FURNACE

DATE OF UPGRADE	DESCRIPTION OF UPGRADE	REASON(S) UPGRADE IS NOT INCLUDED IN THE RECONSTRUCTION DETERMINATION	CAP. COST OF UPGRADE	CUMULATIVE COSTS	REFS.
Jan. 1990	Rebuild stepdown trans-ar...	Not part of a "regulated facility"			1
Jul. 1990	Static var compensator	Not part of a "regulated facility"			1
Aug. 1990	Ucar spray-cooled roof	A regulated part of the EAF	$ 39,559	$ 39,559	
Aug. 1990	Ucar spray-cooled roof	A regulated part of the EAF	$ 170,792	$ 210,351	
Aug. 1990	Brick refactory emplacement	Routine maintenance			
Mar. 1991	Additional costs to static...	Not part of a "regulated facility"			1
Apr. 1991	Storage bins BTW furnace	Not part of a "regulated facility"			1
Sep. 1991	20 x 20 pad of concrete	Not part of a "regulated facility"			1
Oct. 1991	50 x 100 x 12 building	Not part of a "regulated facility"			1
Dec. 1991	DEC modified	DEC not an "regulated facility"			1
Dec. 1991	Rebuild 75000KVA transfor...	A regulated part of the EAF	$ 418,519	$ 628,870	
Jan. 1992	Additional cost to asset	Not replacement of a component of a "regulated facility"			1
Jan. 1992	Ucar spray-cooled roof with...	A regulated part of the EAF	$ 531,631	$ 1,160,501	
Jan. 1992	Split shell arc shop furn...	A regulated part of the EAF	$ 792,352	$ 1,952,853	
Jan. 1992	260 ton lifting rig assem...	Not part of a "regulated facility"			1
Mar. 1992	CO_2 fire suppression system	Not part of a "regulated facility"			1
Mar. 1992	Water filter system for u...	Not part of a "regulated facility"			1
May 1992	Baghouse ductwork expansion joints upgraded	Not part of a "regulated facility"			1
Sep. 1992	Water spray cool electrod...	Not part of a "regulated facility"			1
1993	Closed major part of roof monitor	Not part of a "regulated facility"			1

KEYSTONE STEEL & WIRE COMPANY - Peoria, Illinois
Historical NSPS Reconstruction Applicability Analysis
ELECTRIC ARC FURNACE

DATE OF UPGRADE	DESCRIPTION OF UPGRADE	REASON(S) UPGRADE IS NOT INCLUDED IN THE RECONSTRUCTION DETERMINATION	CAP. COST OF UPGRADE	CUMULATIVE COSTS	REFS.
1993	Modified ladle hoods	Not part of a "regulated facility"			1
Jan. 1993	Addition to existing asse...	Not replacement of a component of a "regulated facility"			
Jan. 1993	Addition to existing asse...	Not replacement of a component of a "regulated facility"			
Jan. 1993	Addition to existing asse...	Not replacement of a component of a "regulated facility"			
Jan. 1993	Addition to existing asse...	Not replacement of a component of a "regulated facility"			
Jan. 1993	Addition to existing asse...	Not replacement of a component of a "regulated facility"			
Jan. 1994	2 digital bath temperatur...	Not part of a "regulated facility"			1
Jan. 1994	Plc 5/30 processor for au...	Not part of a "regulated facility"			1
Oct. 1994	Arc shop modular lunchroom	Not part of a "regulated facility"			1
Dec. 1994	Reactor environ top hats	Not part of a "regulated facility"			1
Dec. 1994	Ground fault analyzer	Not part of a "regulated facility"			1
Mar. 1995	Watteredge cable conditio...	Not part of a "regulated facility"			1
Mar. 1995	Grant-o-matic 3608 track	Not part of a "regulated facility"			1
May 1995	Addition to arch shop lunchroom	Not part of a "regulated facility"			1
May 1995	Arc shop restroom improve	Not part of a "regulated facility"			1
Sep. 1995	Production increased to 750,000 TPY	No capital expenditure on "regulated facility"			1
Sep. 1995	Capitalized interest - 94				
Dec. 1995	Enlarge DEC ducting	Not part of a "regulated facility"			1

KEYSTONE STEEL & WIRE COMPANY - Peoria, Illinois
Historical NSPS Reconstruction Applicability Analysis
ELECTRIC ARC FURNACE

DATE OF UPGRADE	DESCRIPTION OF UPGRADE	REASON(S) UPGRADE IS NOT INCLUDED IN THE RECONSTRUCTION DETERMINATION	CAP. COST OF UPGRADE	CUMULATIVE COSTS	REFS.
Dec. 1995	Combustion chamber/dropout box in DEC added	Not part of a "regulated facility"			1
Dec. 1995	2 arc shop crane baghouse	Not part of a "regulated facility"			1
Jan. 1996	Air/oxy/fuel burners added	Not replacement of a component of a "regulated facility"			1
Jan. 1996	Ladle cranes	Not part of a "regulated facility"			1
Mar. 1996	Ucar spray-cooled roof	A regulated part of the EAF	$ 165,168	$ 2,118,021	
Apr. 1996	Furnace #2 IAF regulator	Not part of a "regulated facility"			1
Aug. 1996	Capitalized interest - AR				
Nov. 1996	Ladle additive station &...	Not part of a "regulated facility"			1
Nov. 1996	Arc shop pulpit & furnace controls	Not part of a "regulated facility"			1
Dec. 1996	Duct entries to BH hoppers enlarged	Not replacement of a component of a "regulated facility"			1
Dec. 1996	Duct and peak shaver installed in DEC	Not replacement of a component of a "regulated facility"			1
Dec. 1996	Canopy enlarged/modified	Not replacement of a component of a "regulated facility"			1
Jan. 1997	Production increased to 850,000 TPY	No capital expenditure on the "regulated facility"			1
		Total	$ 2,118,021		

Based on estimated replacement cost of $7,270,000 in 1992 - 50% is equal to $3,635,000.
"Regulated Facility" is defined as the EAF furnace shell, roof, and transformer, and dust handling equipment.
Dust handling equipment includes the baghouse hoppers, screw conveyors, rotary locks, and related storage equipment.

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Issues:

1) Did Phase I or Phase II production increases utilize a capital expenditure on the affected facilities? If so, NSPS possibly applies.
*[Modification: an **increase in production rate** if the increase **cannot be accomplished without a capital expenditure**]*

2) Will increasing production levels to Phase III levels require a capital expenditure and/or an operational change (e.g., single- to double-furnace operation)? If so, NSPS could apply, since HLA shows an emissions increase subsequent to the Phase III production increase. (ref. 4, Table 3)
*[Modification: an **increase in production rate** if the increase **cannot be accomplished without a capital expenditure**]*
*[Modification: any physical or **operational change** which **results in an increase in the emission rate to the atmosphere**...]*

KEYSTONE STEEL & WIRE COMPANY - Peoria, Illinois
Historical NSPS Modification Applicability Analysis
DUST HANDLING SYSTEMS

DATE OF UPGRADE	DESCRIPTION OF UPGRADE	REASON(S) UPGRADE IS NOT A MODIFICATION	CAP. COST OF UPGRADE	REFS.
Jan. 1990	SS double drawbar w/conic...	no particulate matter emissions increase		1
Jun. 1990	Scavenger duct with dampe...	Not part of a "regulated facility"		2
Jun. 1990	Scavenger duct with dampe...	Not part of a "regulated facility"		2
Aug. 1990	Reverse air fan 62" x 10...	Not part of a "regulated facility"		2
Aug. 1990	Polyester seamless filter	Not part of a "regulated facility"		2
Jan. 1991	Shielded cable and condui...	Not part of a "regulated facility"		2
Jan. 1991	Booster compressor system	Not part of a "regulated facility"		2
Apr. 1991	Pneumatic controls for da...	Not part of a "regulated facility"		2
Jul. 1991	Pneumatically controlled...	Not part of a "regulated facility"		2
Feb. 1994	Arc shop ladle hoods	Not part of a "regulated facility"		2
Dec. 1994	Caster baghouse dust coll...	Not part of "Arc shop "		2
Dec. 1995	Addition to dust collecti...	no particulate matter emissions increase		1
Jan. 1996	Beck actuators (3) for de...	no particulate matter emissions increase		1
Aug. 1996	Dust collection system	Not part of a "regulated facility"		2
Aug. 1996	Capitalized interest - du...	Not part of a "regulated facility"		2
		TOTAL		

1. Improvements to the dust handling system were installed to improve dust handling efficiency and to reduce fugitive emissions from the system.
2. "Regulated Facility" is defined as the EAF furnace shell,roof, and dust handling equipment for subpart AA and shell,roof, transformer, and dust handling equipment for subpart AAa. Dates for applicablity are for subpart AA, October 21,1974 to August 17, 1983 and subpart AAa August 7,1983 to present. Dust handling equipment includes the baghouse hoppers, screw conveyors, rotary locks, and related storage equipment.
3. Engineering estimate of the percentage of the total cost of the dust collector system that was spent on the dust handling portion.

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KEYSTONE STEEL & WIRE COMPANY - Peoria, Illinois
Historical NSPS Reconstruction Applicability Analysis
DUST HANDLING SYSTEMS

DATE OF UPGRADE	DESCRIPTION OF UPGRADE	REASON(S) UPGRADE IS NOT INCLUDED IN THE RECONSTRUCTION DETERMINATION	ADJ. CAP. COST OF UPGRADE	CUMULATIVE COSTS	REFS.
Jan. 1970	**Fume dust collector after...**	**Original Equipment**	$ 557,138		
Jan. 1970	**Fume dust collector dust handling system (20% of total dust collector cost)**	**Original Equipment**	$ 111,428		3
Jun. 1970	**Cooling tower**	**Original Equipment**			
Jun. 1970	**120 GPM waste water pump**	**Original Equipment**			
Jun. 1970	**Water treat system**	**Original Equipment**			
Jun. 1970	**Temp instrumentation**	**Original Equipment**			
Jun. 1970	**Pressure instrumentation**	**Original Equipment**			
Jun. 1971	7½ cu yd dumpster cont...		$ 1,541		1
Jun. 1971	7½ cu yd dumpster cont...		$ 1,541		1
Jun. 1971	Dempster dumpster mod LFW		$ 7,280		1
Jun. 1971	Dust disposal equipment		$ 19,475		1
		TOTAL		$ 29,838	
Apr. 1973	Arc shop fan housing in d...	Not part of a "regulated facility"			2
Jun. 1974	G E Auto Transformer #332...	Not part of a "regulated facility"			2
Jun. 1975	D43210070 1224 Vibration M...	Not part of a "regulated facility"			2
Jun. 1975	1000HP GE 01-1396-75 K102	Not part of a "regulated facility"			2
Jun. 1975	K1058 Controller 05-1594-...	Not part of a "regulated facility"			2
Jan. 1978	Conveyor for dust collect...		$ 5,000		1
Jan. 1978	Conveyor for dust collect...		$ 5,000		1

KEYSTONE STEEL & WIRE COMPANY - Peoria, Illinois
Historical NSPS Reconstruction Applicability Analysis
DUST HANDLING SYSTEMS

DATE OF UPGRADE	DESCRIPTION OF UPGRADE	REASON(S) UPGRADE IS NOT INCLUDED IN THE RECONSTRUCTION DETERMINATION	ADJ. CAP. COST OF UPGRADE	CUMULATIVE COSTS	REFS.
Jan. 1978	Hopper for dust collection		$ 47,449		1
Jan. 1978	Hopper for dust collection		$ 47,449		1
Jan. 1978	Hopper for dust collection		$ 47,449		1
Jan. 1978	Hopper for dust collection		$ 47,449		1
Jan. 1978	Hopper for dust collection		$ 47,449		1
Jan. 1978	Hopper for dust collection		$ 47,449		1
Jan. 1978	Hopper for dust collection		$ 47,449		1
Jan. 1978	Hopper for dust collection		$ 47,449		1
Jan. 1978	Hopper for dust collection		$ 47,449		1
Jan. 1978	Hopper for dust collection		$ 47,449		1
Jan. 1978	Rotary lock for dust coll...		$ 2,500		1
Jan. 1978	Rotary lock for dust coll...		$ 2,500		1
Jan. 1978	Rotary lock for dust coll...		$ 2,500		1
Jan. 1978	Rotary lock for dust coll...		$ 2,500		1
Jan. 1978	Rotary lock for dust coll...		$ 2,500		1
Jan. 1978	Rotary lock for dust coll...		$ 2,500		1
Jan. 1978	Rotary lock for dust coll...		$ 2,500		1
Jan. 1978	Rotary lock for dust coll...		$ 2,500		1
Jan. 1978	Rotary lock for dust coll...		2,500$		1

KEYSTONE STEEL & WIRE COMPANY - Peoria, Illinois
Historical NSPS Reconstruction Applicability Analysis
DUST HANDLING SYSTEMS

DATE OF UPGRADE	DESCRIPTION OF UPGRADE	REASON(S) UPGRADE IS NOT INCLUDED IN THE RECONSTRUCTION DETERMINATION	ADJ. CAP. COST OF UPGRADE	CUMULATIVE COSTS	REFS.
		TOTAL		$ 539,328	
Jan. 1978	Manifold System in dust c...	Not part of a "regulated facility"			2
Jan. 1978	AAF dust collect system b...	Not part of a "regulated facility"			2
Jan. 1978	Foundation arc shop baghouse	Not part of a "regulated facility"			2
Jan. 1978	ID fan motor 1250HP for...	Not part of a "regulated facility"			2
Jan. 1978	Main system fan for dust	Not part of a "regulated facility"			2
Jan. 1978	ID fan motor 1250HP for...	Not part of a "regulated facility"			2
Jan. 1978	Main system fan for dust	Not part of a "regulated facility"			2
Jan. 1978	Main section fans and mot...	Not part of a "regulated facility"			2
Jan. 1978	Foundation for fans and m...	Not part of a "regulated facility"			2
Jan. 1978	ID fan motor 1250HP for...	Not part of a "regulated facility"			2
Jan. 1978	Fans and motors old baghouse	Not part of a "regulated facility"			2
Jan. 1978	Omain system for dust		$ 60,000		1
		TOTAL		$ 599,328	
Jan. 1978	Foundation for fans & mot...	Not part of a "regulated facility"			2
Jan. 1978	Shielding for ductwork du...	Not part of a "regulated facility"			2
Jan. 1978	Shielding for ductwork du...	Not part of a "regulated facility"			2
Jan. 1978	Walkway ductwork in dust	Not part of a "regulated facility"			2
Jan. 1978	Walkway ductwork in dust	Not part of a "regulated facility"			2
Jan. 1978	Ductwork support tower du...	Not part of a "regulated facility"			2

KEYSTONE STEEL & WIRE COMPANY - Peoria, Illinois
Historical NSPS Reconstruction Applicability Analysis
DUST HANDLING SYSTEMS

DATE OF UPGRADE	DESCRIPTION OF UPGRADE	REASON(S) UPGRADE IS NOT INCLUDED IN THE RECONSTRUCTION DETERMINATION	ADJ. CAP. COST OF UPGRADE	CUMULATIVE COSTS	REFS.
Jan. 1978	System ductwork for dust	Not part of a "regulated facility"			2
Jan. 1978	Support structure ductwork	Not part of a "regulated facility"			2
Jan. 1978	Support structure ductwork	Not part of a "regulated facility"			2
Jan. 1978	Engr. study dust collection	Not part of a "regulated facility"			2
Jan. 1978	Reinforce baghouse for du...	Not part of a "regulated facility"			2
Jan. 1978	Canopy hood system for du...	Not part of a "regulated facility"			2
Jan. 1978	Foundation ladle hood in...	Not part of a "regulated facility"			2
Jan. 1978	Jib crane for ladle hood	Not part of a "regulated facility"			2
Jan. 1978	Jib crane for ladle hood	Not part of a "regulated facility"			2
Jan. 1978	Guillotine damper for lad...	Not part of a "regulated facility"			2
Jan. 1978	Guillotine damper for lad...	Not part of a "regulated facility"			2
Jan. 1978	Ductwork ladle hood dust	Not part of a "regulated facility"			2
Jan. 1978	Boom ladle hood jib crane	Not part of a "regulated facility"			2
Jan. 1978	Boom ladle hood jib crane	Not part of a "regulated facility"			2
Jan. 1978	Ladle hood dust collection	Not part of a "regulated facility"			2
Jan. 1978	Heating & vent for butler	Not part of a "regulated facility"			2
Jan. 1978	Butler 18x30x12 SBF building	Not part of a "regulated facility"			2
Jan. 1978	5000KVA Askeral transform	Not part of a "regulated facility"			2
Jan. 1978	Support tower for 13.8KV	Not part of a "regulated facility"			2
Jan. 1978	Dust collector panel prog...	Not part of a "regulated facility"			2

KEYSTONE STEEL & WIRE COMPANY - Peoria, Illinois
Historical NSPS Reconstruction Applicability Analysis
DUST HANDLING SYSTEMS

DATE OF UPGRADE	DESCRIPTION OF UPGRADE	REASON(S) UPGRADE IS NOT INCLUDED IN THE RECONSTRUCTION DETERMINATION	ADJ. CAP. COST OF UPGRADE	CUMULATIVE COSTS	REFS.
Jan. 1978	Dust collector motor cont...	Not part of a "regulated facility"			2
Jan. 1978	Melter office panel for d...	Not part of a "regulated facility"			2
Jan. 1978	500 KVA dry transformer to...	Not part of a "regulated facility"			2
Jan. 1978	Magnetic starter for fan	Not part of a "regulated facility"			2
Jan. 1978	Magnetic starter for fan	Not part of a "regulated facility"			2
Jan. 1978	Magnetic starter for fan	Not part of a "regulated facility"			2
Jan. 1978	Circuit breaker main on 2	Not part of a "regulated facility"			2
Jan. 1978	Circuit breaker 1200AMP 1...	Not part of a "regulated facility"			2
Jan. 1978	Main power feed switch ge...	Not part of a "regulated facility"			2
Jan. 1978	Limit signal switch dust	Not part of a "regulated facility"			2
Jan. 1978	Manifold with damper dust co...	Not part of a "regulated facility"			2
Jan. 1978	Misc. spare parts for dust	Not part of a "regulated facility"			2
Jan. 1978	Switch L300SW-2M-3 spare	Not part of a "regulated facility"			2
Jan. 1978	Switch L300WTR-2M-12 spare	Not part of a "regulated facility"			2
Jan. 1978	W1054-0428 740 filter bag	Not part of a "regulated facility"			2
Jan. 1978	LM2001-434B Duff-Nort line	Not part of a "regulated facility"			2
Jan. 1978	LM2001-434B Duff-Nort line	Not part of a "regulated facility"			2
Jan. 1978	LM2001433B Duff-Nort line	Not part of a "regulated facility"			2
Jan. 1978	LM2001433B Duff-Nort line	Not part of a "regulated facility"			2
Jun. 1980	Arc shop dust & fume cont...	Not part of a "regulated facility"			2

KEYSTONE STEEL & WIRE COMPANY - Peoria, Illinois
Historical NSPS Reconstruction Applicability Analysis
DUST HANDLING SYSTEMS

DATE OF UPGRADE	DESCRIPTION OF UPGRADE	REASON(S) UPGRADE IS NOT INCLUDED IN THE RECONSTRUCTION DETERMINATION	ADJ. CAP. COST OF UPGRADE	CUMULATIVE COSTS	REFS.
Jun. 1980	Baghouse fan & liners wo...	Not part of a "regulated facility"			2
Jun. 1980	Dec tunnel water infiltra...	Not part of a "regulated facility"			2
Jun. 1980	Dec system "Y" section wo...	Not part of a "regulated facility"			2
Dec. 1980	Arc shop dust box, convey		$ 10,750		1
Jul. 1987	36' x 75' concrete floor	Not part of a "regulated facility"			2
Jul. 1987	36' x 75' x 24' metal building	Not part of a "regulated facility"			2
Jul. 1987	Direct drive panel fan	Not part of a "regulated facility"			2
Jul. 1987	Conveyor belt 12" diameter		$ 13,704		1
Jul. 1987	Conveyor belt 12" diameter		$ 14,175		1
Jul. 1987	Conveyor belt 12" diameter		$ 15,520		1
Jul. 1987	Conveyor belt 12" diameter		$ 15,520		1
Jul. 1987	Conveyor belt 12" diameter		$ 8,537		1
Jul. 1987	50 ton storage hopper 12' diameter		$ 39,626		1
Jul. 1987	#2212 Pug Mixer		$ 22,330		1
Jul. 1987	Conveyor belt reversing 2...		$ 15,302		1
Jul. 1987	Metal support platform		$ 10,194		1
Jul. 1987	Set of controls		$ 9,841		1
Jul. 1987	2 loose discharge spouts		$ 7,182		1
Jul. 1987	3HP electra crane hoist t...		$ 8,933		1
				$ 790,942	

KEYSTONE STEEL & WIRE COMPANY - Peoria, Illinois
Historical NSPS Reconstruction Applicability Analysis
DUST HANDLING SYSTEMS

DATE OF UPGRADE	DESCRIPTION OF UPGRADE	REASON(S) UPGRADE IS NOT INCLUDED IN THE RECONSTRUCTION DETERMINATION	ADJ. CAP. COST OF UPGRADE	CUMULATIVE COSTS	REFS.
Jul. 1987	Chromolox industrial spac...	Not part of a "regulated facility"			2
Jul. 1987	(5) 400 W sodium bay lights	Not part of a "regulated facility"			2
Jul. 1987	3 fluorescent lights	Not part of a "regulated facility"			2
Jul. 1987	2 Lumark micro-flood lights	Not part of a "regulated facility"			2
Jul. 1987	2 rack & pinion discharge		$ 7,358		1
Jul. 1987	Transformer box	Not part of a "regulated facility"			2
Jul. 1987	Circuit breaker box w/rel...	Not part of a "regulated facility"			2
Jul. 1987	Circuit breaker box w/rel...	Not part of a "regulated facility"			2
May 1989	24" x 30" belt conveyor		$ 18,032		1
Jan. 1990	SS double drawbar w/conic...		$ 35,118		1
		TOTAL		$ 851,449	
Jun. 1990	Scavenger duct with dampe...	Not part of a "regulated facility"			2
Jun. 1990	Scavenger duct with dampe...	Not part of a "regulated facility"			2
Aug. 1990	Reverse air fan 62" x 10...	Not part of a "regulated facility"			2
Aug. 1990	Polyester seamless filter	Not part of a "regulated facility"			2
Jan. 1991	Shielded cable and condui...	Not part of a "regulated facility"			2
Jan. 1991	Booster compressor system	Not part of a "regulated facility"			2
Apr. 1991	Pneumatic controls for da...	Not part of a "regulated facility"			2
Jul. 1991	Pneumatically controlled...	Not part of a "regulated facility"			2
Feb. 1994	Arc shop ladle hoods	Not part of a "regulated facility"			2

KEYSTONE STEEL & WIRE COMPANY - Peoria, Illinois
Historical NSPS Reconstruction Applicability Analysis
DUST HANDLING SYSTEMS

DATE OF UPGRADE	DESCRIPTION OF UPGRADE	REASON(S) UPGRADE IS NOT INCLUDED IN THE RECONSTRUCTION DETERMINATION	ADJ. CAP. COST OF UPGRADE	CUMULATIVE COSTS	REFS.
Dec. 1994	Caster baghouse dust coll...	Not part of "Arc shop "			2
Dec. 1995	Addition to dust collecti...		$ 28,095		1
Jan. 1996	Beck actuators (3) for de...		$ 33,359		1
Aug. 1996	Dust collection system	Not part of a "regulated facility"			2
Aug. 1996	Capitalized interest - du...	Not part of a "regulated facility"			2
		TOTAL		$ 912,903	

1. Improvements to the dust handling system were installed to improve dust handling efficiency and to reduce fugitive emissions from the system.
2. "Regulated Facility" is defined as the EAF furnace shell,roof, and dust handling equipment for subpart AA and shell,roof, transformer, and dust handling equipment for subpart AAa. Dates for applicablity are for subpart AA, October 21,1974 to August 17, 1983 and subpart AAa August 18,1983 to present. Dust handling equipment includes the baghouse hoppers, screw conveyors, rotary locks, and related storage equipment.
3. Engineering estimate of the percentage of the total cost of the dust collector system that was spent on the dust handling portion.

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