



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

DEC 22 2005

REPLY TO THE ATTENTION OF

(AE-17J)

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Ron Dickerson  
Vice President and General Manager  
Nucor Steel  
4537 South Nucor Road  
Crawfordsville, Indiana 47933

Re: Finding of Violation  
Nucor Steel  
Crawfordsville, Indiana

Dear Mr. Dickerson:

The United States Environmental Protection Agency (U.S. EPA) is issuing the enclosed Finding of Violation (FOV) to Nucor Steel (you) under Section 112 of the Clean Air Act, 42 U.S.C. § 7412. We find that you are violating the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Steel Pickling - HCl Process Facilities and Hydrochloric Acid Regeneration Plants found in 40 C.F.R. Part 63, Subpart CCC at your facility located at Rural Route 2, Box 311, Crawfordsville, Indiana.

We have several enforcement options under Section 113(a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(3). These options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial, civil, or criminal action. The options we select may depend on, among other things, the length of time you take to achieve and demonstrate continuous compliance with the rules cited in the FOV.

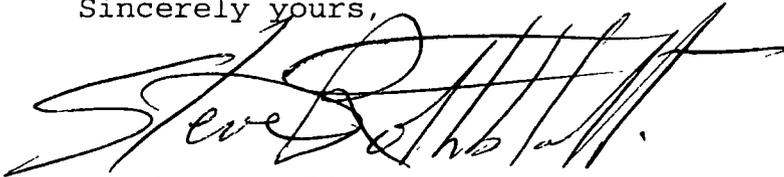
We are offering you an opportunity to confer with us about the violations alleged in the FOV. The conference will give you an opportunity to present information on the specific findings of

violation, any efforts you have taken to comply, and the steps you will take to prevent future violations.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The U.S. EPA contact in this matter is Monica Onyszko. You may call her at (312) 353-5139 to request a conference. You should make the request as soon as possible, but no later than 10 calendar days after you receive this letter. We should hold any conference within 30 calendar days of your receipt of this letter.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Steve Rothblatt". The signature is stylized and somewhat cursive, with a long horizontal stroke extending to the right.

Stephen Rothblatt, Director  
Air and Radiation Division

Enclosure

cc: David McIver, Chief  
Office of Air Quality  
Indiana Department of Environmental Management

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 5**

**IN THE MATTER OF:** )  
 )  
Nucor Steel ) **FINDING OF VIOLATION**  
Crawfordsville, Indiana )  
 ) **EPA-5-06-06-IN**  
 )  
Proceedings Pursuant to )  
Section 112 of )  
the Clean Air Act, )  
42 U.S.C. §§ 7401 et seq. )  
\_\_\_\_\_ )

**FINDING OF VIOLATION**

The Administrator of the United States Environmental Protection Agency (U.S. EPA) finds that Nucor Steel (Nucor) is violating Section 112 of the Clean Air Act, 42 U.S.C. § 7412. A Finding of Violation (FOV) is being issued to Nucor specifically for violating the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Steel Pickling - HCl Process Facilities and Hydrochloric Acid Regeneration Plants at 40 C.F.R. Part 63, Subpart CCC as follows:

**Statutory and Regulatory Background**

1. The NESHAP for Steel Pickling - HCl Process Facilities and Hydrochloric Acid Regeneration Plants at 40 C.F.R. Part 63, Subpart CCC states at 40 C.F.R. § 63.1155(a)(1) that the provisions of this subpart apply to all new and existing steel pickling facilities that pickle carbon steel using hydrochloric acid (HCl) solution that contains 6 percent or more by weight HCl and is at a temperature of 100 degrees Fahrenheit or higher and that are major sources for hazardous air pollutants (HAP).
2. Section 112(a)(1) of the Clean Air Act (CAA), 40 C.F.R. § 63.2, defines a major source as any stationary source that emits or has the potential to emit considering controls 10 tons per year or more of any HAP or 25 tons per year or more of any combination of HAP.
3. Pursuant to Section 112(b) of the CAA, 42 U.S.C. 7412, hydrochloric acid is listed as a HAP.

4. The NESHAP, at 40 C.F.R. § 63.1157(a)(1) and (2), prohibits the owner and operator of an existing affected continuous or batch pickling line at a steel pickling facility to cause or allow to be discharged into the atmosphere from the affected pickling line any gases that contain HCl in a concentration greater than 18 parts per million by volume (ppmv) or HCl at a mass emission rate that corresponds to a collection efficiency of less than 97 percent.
5. 40 C.F.R. § 63.1162 (a)(1) states that the owner or operator of a new, reconstructed, or existing steel pickling facility or acid regeneration plant subject to Subpart CCC shall conduct performance tests to measure the HCl mass flows at the control device inlet and outlet or the concentration of HCl exiting the control device according to the procedures described in § 63.1161 of Subpart CCC. Performance tests shall be conducted either annually or according to an alternative schedule that is approved by the applicable permitting authority, but no less frequently than every 2 1/2 years or twice per Title V permit term. If any performance test shows that the HCl emission limitation is being exceeded, then the owner or operator is in violation of the emission limit.

#### Nucor Facility

6. Nucor owns and operates an existing steel pickling facility (facility) at Rural Route 22, Box 311, Crawfordsville, Indiana (the facility).
7. Nucor Steel operates a stationary steel mini-mill that produces all grades of carbon, stainless steel, alloy steel, ultra low and low carbon steel, flat rolled, hot rolled, cold rolled, galvanized, pickled and oiled steel products.
8. Nucor Steel is subject to a Title V: Significant Source Modification (Title V) permit, Number 107-16823-00038, under the provisions of prevention of significant deterioration, issued November 21, 2003 by the Indiana Department of Environmental Management (IDEM).
9. The facility is defined as a major source under Section 112(a)(1) of the CAA, 40 C.F.R. § 63.2, which defines a major source as any stationary source that emits or has the potential to emit considering controls 10 tons per year or

more of any HAP or 25 tons per year or more of any combination of HAP.

10. The Purdue Pickle Line #2 (PL2) at the facility has a maximum capacity of 250 tons/hour, uses HCl pickling solution and rinse water and is equipped with a process tank.
11. PL2 emissions are controlled by a counter flow tray scrubber and mist eliminators. The PL2 scrubber has a flow rate of 9,000 actual cubic feet/min (acf/min) and loading of 0.01 grains/dry standard cubic foot (gr/dscf). The PL2 scrubber shall be in operation and control emissions at all times that PL2 is in operation.
12. Performance testing must be conducted on the PL2 scrubber inlet and outlet once every 2.5 years pursuant to 40 C.F.R. § 63.1162(a)(1) and as stated in the Title V permit, Section D.4.8(d).
13. Nucor contracted with Air Test Professionals, Inc. (ATP) of Indianapolis, Indiana to perform air emission sampling at the facility on the PL2 scrubber inlet and outlet.
14. PL2 outlet emissions are subject to the standards and limits in 40 C.F.R. § 63.1157.
15. On September 8, 2005, ATP performed air emission sampling on PL2 to fulfill the requirement of 40 C.F.R. § 63.1162(a)(1).
16. Method 26A, "Determination of Hydrogen Halide Emissions from Stationary Sources," was used to determine compliance with Subpart CCC for HCl emissions.

#### **Violations**

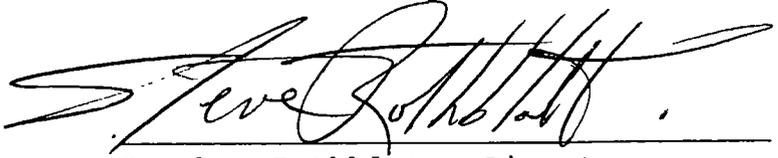
17. The facility emitted from the PL2 outlet duct HCl at a three-run average level of 101.8 ppmv and a three-run average collection efficiency of 95.86 percent. Nucor violated 40 C.F.R. § 63.1157(a)(1) and (2) by discharging into the atmosphere gases that contain HCl in a concentration greater than 18 ppmv and at a mass emission rate corresponding to a collection efficiency of less than 97 percent.

#### **Finding of Violation**

The Administrator of the U.S. EPA, by authority duly delegated to the undersigned, notifies Nucor Steel that the facility

described above is in violation of the applicable portions of the Clean Air Act, as set forth in this Finding of Violation.

12/22/2005  
Date

A handwritten signature in black ink, appearing to read "Steve Rothblatt", written over a horizontal line.

Stephen Rothblatt, Director  
Air and Radiation Division

CERTIFICATE OF MAILING

I, Betty Williams, certify that I sent a Finding of Violation, No. EPA-5-06-06-IN, by Certified Mail, Return Receipt Requested, to:

Ron Dickerson  
Vice President and General Manager  
Nucor Steel  
4537 South Nucor Road  
Crawfordsville, Indiana 47933

I also certify that I sent a copy of the Finding of Violation, No. EPA-5-06-06-IN, by First Class Mail to:

David McIver, Chief  
Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate, Room 1001  
Indianapolis, Indiana 46206-6015

on the 22<sup>nd</sup> day of December 2005.

  
\_\_\_\_\_  
Betty Williams, Secretary  
AECAS (IL/IN)

CERTIFIED MAIL RECEIPT NUMBER: 70010320 0005 8909 7599