



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

NOV 7 0 2012

REPLY TO THE ATTENTION OF:

Matthew Stuckey, Chief
Permits Branch
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

Dear Mr. Stuckey:

The U.S. Environmental Protection Agency has reviewed the draft prevention of significant deterioration permit for Steel Dynamics, Inc. – Structural and Rail Division (permit number 183-27145-00030), in Columbia City, Indiana. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1. Section D.8 does not specify a compliance determination method for the Particulate Matter (PM) Best Available Control Technology (BACT) limits in permit condition D.8.2 for cooling towers ID#15a - ID#15g. The permit should clarify how compliance is determined for these limits.
2. The BACT analysis (page 11 of technical support document, appendix B) says the use of baghouses to control PM emissions from the three material storage bins/silos (ID#12a - ID#12c) is cost prohibitive due to low particulate emissions from the bins/silos. However, the permit does not include a cost analysis that calculates the dollars per ton of emissions removed for this control option. The permit documentation should include this information to justify the conclusion that this BACT option is cost prohibitive.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact me or have your staff contact Sam Portanova, of my staff, at (312) 886-3189.

Sincerely,

A handwritten signature in black ink, appearing to read "Genevieve Damico".

for Genevieve Damico
Chief
Air Permits Section