



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

AUG 26 2016

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

REPLY TO THE ATTENTION OF

Dear Mr. Stuckey:

The U.S. Environmental Protection Agency has reviewed the draft prevention of significant deterioration and part 70 significant permit modification for Nucor Steel, permit numbers 107-36834-00038 and 107-37019-00038, respectively. 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 comment.

Section D.11 of the permit does not include monitoring, recordkeeping, or reporting requirements that can be used to demonstrate compliance with the best available control technology (BACT) limits in Condition D.11.2. 40 C.F.R. § 70.6(a)(3) and 326 IAC 2-7-5(3) both require part 70 permits to include monitoring and related recordkeeping and reporting requirements so that compliance with the BACT limits can be evaluated. Page 7 of the technical support document (TSD) states that operation of the drift eliminator will ensure compliance with the BACT limits. However, TSD Appendix A page 2 relies on both the BACT maximum drift rate and the average total dissolved solids (TDS) content to calculate the BACT emission limits. Since the TDS content is presented as an average value, it is not clear whether operation of the drift eliminator alone will assure compliance with the BACT limits if the TDS content is above the average value used in the calculation. Given this uncertainty, we request either additional justification for not including monitoring requirements or the addition of monitoring, recordkeeping, and reporting requirements to demonstrate compliance with Condition D.11.2.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,

A handwritten signature in black ink, appearing to read "Genevieve Damico", with the word "for" written in smaller letters to the right of the signature.

Genevieve Damico  
Chief  
Air Permits Section