

**From:** [Noveer, Aasim](#)  
**To:** [Gurinder \(Gary\) Saini](#)  
**Cc:** [amber.carter@nucor.com](mailto:amber.carter@nucor.com); [Mark Washer - Nucor Steel](#); [Williams, Brian](#)  
**Subject:** RE: Applicant Review for SSM No. 107-47617-00038 and SPM No. 107-47704-00038 for Nucor Steel  
**Date:** Tuesday, June 25, 2024 10:50:00 AM  
**Attachments:** [47617\\_atsd.docx](#)

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Dear Amber Carter and Gurinder (Gary) Saini:

Here is the ATSD due to the received Public Notice comments. No changes have been made in the permit, however, this ATSD is being provided to you as a courtesy as we prepare the source modification documents for issuance.

Sincerely,  
Aasim

**From:** Gurinder (Gary) Saini <saini@rtpenv.com>  
**Sent:** Thursday, June 6, 2024 3:28 PM  
**To:** Noveer, Aasim <ANoveer@idem.IN.gov>  
**Cc:** [amber.carter@nucor.com](mailto:amber.carter@nucor.com); [Mark Washer - Nucor Steel](#) <Mark.Washer@nucor.com>; [Williams, Brian](#) <BWilliam@idem.IN.gov>  
**Subject:** RE: Applicant Review for SSM No. 107-47617-00038 and SPM No. 107-47704-00038 for Nucor Steel

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Thank you for your review of the application and issuing the draft permit for public comment. On behalf of Nucor Steel, I am submitting the following comments on the draft modification documents SSM No. 107-47617-00038 and SPM No. 107-47704-00038.

- a. The draft permit condition D.5.5(a) requires permittee to conduct visible emissions notations (VEN) of the four lime/dolo silos (SEAFN1, SEAFN2, NEAFN1, NEAFN2) once per day during normal daylight operations. Further, for discontinuous operations, readings are required to be taken during "... part of the operation that would normally be expected to cause the greatest emissions."

The proposed lime silos will be equipped with inherent bin vent filters. Trucks with lime will be pneumatically unloaded into the silos and the inherent bin vent filters allow for displacement air to be released while ensuring transport / recovery of dolo/lime in the silos. Thus, particulate matter emissions only occur during the truck unloading activity (discontinuous operation). Per IDEM guidance (January 2011 Compliance Monitoring Guidance), for operations that involve coal, limestone, gypsum handling units including 'unloading points,' once per week visible emissions notations should be considered for compliance monitoring. Lime is similar to the limestone material in terms of its characteristics. Further, it is likely that when in operation, each silo will be filled couple of times a week. Therefore, requirement for daily VEN of the four silos bin

vent filters is redundant and unnecessary, especially when no emissions causing activity will be occurring. We request IDEM change the VEN frequency to weekly for the four silos under condition D.5.5(a).

- b. The draft Permit documents carry over some of the conditions that Nucor had previously appealed before the Indiana Office of Environmental Adjudication in Cause No. 23-A-J-5246. In light of that appeal, we are providing the following general comment on incorporation of Coating Complex Permit provisions.

The draft Part 70 Operating Permit modification 107-47382-00038 and associated source modification (107-46841) incorporate conditions from SSM 107-45480-00038 and SPM 107-45562-00038. Nucor filed comments on the draft SSM and SPM requesting changes to certain aspects of the BACT requirements and associated monitoring, recordkeeping and reporting requirements for the project affected units. IDEM, OAQ issued the final permit without fully resolving Nucor's concerns and Nucor filed appeals of both SSM 107-45480-00038 and SPM 107-45562-00038. Nucor hereby incorporates both its prior filed comments (to the extent relevant) and the objections to the BACT and associated monitoring, recordkeeping and reporting requirements in its appeals in its comments on this Part 70 Operating Permit modification and associated source modification. Nucor requests that IDEM, OAQ specifically acknowledge that if Nucor is successful in its appeal of SSM 107-45480-00038 and any conditions of that permit are revised as a result of the appeal, that the Title V permit will be reopened and revised to reflect the resolution of that pending appeal. This may obviate the need for an appeal of this permit solely based on the proposed incorporation of conditions under appeal in another contested case.

Please let us know if you have any questions or need anything else in this regard.

Regards

GS

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