

From: [Noveer, Aasim](#)
To: [Gurinder \(Gary\) Saini](#)
Cc: 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](#)

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; [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

****** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ******

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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BILLING WORKSHEET

TV Permits

For Applications Received On and After October 1, 2019

Permit #: 107-47704-00038
 Permit Reviewer: Aasim Noveer
 Application Received Date: 3/7/2024

Instructions: Permit Reviewers will fill out yellow-highlighted cells (as necessary) and check the appropriate box or fill in the number of reviews. The total fee will be calculated at the bottom and transferred to the billing amount on the first page. Permit Reviewers will change the bottom worksheet tab color to yellow to indicate the permit billing worksheet that was filled out. PASS staff will fill out the green-highlighted cells (as necessary).

TV Fees			
<input type="checkbox"/>		\$793	TV MSM (45)
<input type="checkbox"/>		\$5,556	TV NSC (Minor PSD/EO) (120)
<input type="checkbox"/>		\$9,525	TV NSC (Major PSD/EO) (270)
<input type="checkbox"/>		\$5,556	TV SSM (Minor PSD/EO) (120)
<input type="checkbox"/>		\$9,525	TV SSM (Major PSD/EO) (270)
<i>Note: See "Transition scenarios - permits and fees" document located in SharePoint for more information on handling transition permits and associated fees.</i>			

NSPS / NESHAP / 326 IAC 8-1-6 BACT / 326 IAC 2-4.1 MACT Review			
Number of Reviews	Total Fee	Fee	See "NSPS-NESHAP-BACT Billing Info" document for instructions
<input type="checkbox"/>		\$793	for each review for an applicable NSPS
<input type="checkbox"/>		\$793	for each review for an applicable NESHAP
<input type="checkbox"/>		\$952	times each 326 IAC 8-1-6 BACT and each 326 IAC 2-4.1 MACT
<i>For each best available control technology (BACT) analysis for VOC under 326 IAC 8-1-6 and for each maximum achievable control technology (MACT) under 326 IAC 2-4.1. [326 IAC 2-1.1-7(m)(5)]</i>			

Other Fees			
<input type="checkbox"/>		\$793	Interim – Any type
<input type="checkbox"/>		\$793	Public Hearing

PSD BACT or LAER Review			
<input type="checkbox"/>		\$4,762	2 to 5 Review Analyses
<input type="checkbox"/>		\$9,525	6 to 10 Review Analyses
<input type="checkbox"/>		\$15,875	11 or more Review Analyses
<i>Fees for BACT under 326 IAC 2-2-3 or LAER under 326 IAC 2-3-3 are per pollutant and per emissions unit or group of identical emissions units for which a control technology analysis is required. [326 IAC 2-1.1-7(m)(2)]</i>			

Air Quality Impact Study Review			
Number of Pollutants	Total Fee	Fee	
<input type="checkbox"/>		\$9,525	per pollutant if OAQ does the analysis
<input type="checkbox"/>		\$5,556	if applicant does the analysis (not dependent on number of pollutants)

Plantwide Applicability Limitation (PAL)		
PAL Pollutants (tons/year)	Total Fee	<i>Instructions: enter total allowable tons under all PALs in the permit - fee, including max fee, will calculate automatically.</i>
		PAL: separate fee per PAL pollutant. \$63 per ton of allowable emissions Maximum Combined fee for all PAL pollutants not to exceed \$63,500

 \$0 **Total Applicable Fee**

OAQ Permits Branch Invoice Worksheet

Instructions: Permit Reviewers will fill out yellow-highlighted cells (as necessary). Permit Reviewers will change the bottom worksheet tab color to yellow to indicate the permit billing worksheet that was filled out. PASS staff will fill out the green-highlighted cells (as necessary).

Source Name: Nucor Steel

TEMPO AI: 12021

Permit #: 107-47704-00038

CST #:

Credit for permit fees: \$

Credit Received Date:

Note: IDEM's accounting office requires that fee bills or refunds, be sent to the accounts Department at the billing address listed on application. If a courtesy copy is needed, please indicate at the bottom of this page.

Permit Reviewer please indicate applicable fees on page #2. Total will carry over to this page.

Total Due: \$ \$0

Total Credit: \$ \$0

Total Permitting Fees Applicable: \$ \$0

Total Refund Due: \$

Reason for Refund:

Adjustments to Applicable Fees: \$

Explanation of adjustments:

A courtesy copy of the billing has been requested by the applicant, please send to:

Name/Title:

Address:

Permit Reviewer: Aasim Noveer

Date: 5/15/2024