



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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July 7, 2005

David Sulc
Nucor Steel
R.R.2, Box 311
Crawfordsville, Indiana 47933

Re: Response to Review Request No. 107-21337
Permit status evaluation
Plant ID: 107-00038

Dear Mr. Sulc:

On November 21, 2003, Nucor Steel was issued a Prevention of Significant Deterioration (PSD) – Part 70 Significant Source Modification Permit (PSD/SSM 107-16823-00038) for the modification of the existing Electric Arc Furnaces (EAFs), Argon-Oxygen Decarburization (AOD) operations and other processes within the steel mill. Nucor Steel submitted a letter on May 27, 2005. The request was submitted to determine if Nucor Steel can continue to operate under existing PSD SSM 107-16823-00038 when SO₂ emissions of regulated pollutants from the Melt Shop EAF and LMF baghouses may differ from permit conditions based on the calculation method for desulfurization of the ladle. Nucor Steel requested in the letter for IDEM OAQ to discuss the approach for combining the two emission limits into a single emission limitation for the Melt Shop EAF and LMF baghouses.

IDEM OAQ believes this type of permit modification requires a complete PSD BACT review. IDEM OAQ requires Nucor Steel to submit a complete PSD BACT application. This application should include an explanation / justification of why the emissions should be combined for the Melt Shop EAF and LMF baghouses. The application should include the proper permit forms, air quality analysis and other appropriate materials. An evaluation of the RBLC would be required in order to compare those sources demonstrating BACT with a combined limit versus those sources demonstrating BACT with separate limits for the EAF and LMF operations.

Questions should be directed to Lawrence Stapf, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, or call (800) 451-6027, or extension 2-8427, or dial (317) 232-8427 and ask for Lawrence Stapf.

Sincerely,

Nisha Sizemore, Section Chief
Permits Branch
Office of Air Quality

Attachments

LS

cc: File – Montgomery County
Montgomery County Health Department
Air Compliance Section Inspector – Richard Sekula
Compliance Data Section
Technical Support and Modeling