



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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Eric J. Holcomb  
Governor

Bruno L. Pigott  
Commissioner

Date: March 27, 2020

Thomas Reed  
Pyrolyx USA Indiana, LLC  
4150 East Steelton Ave  
Terre Haute, IN 47805

Re: Stack Test Extension Response Letter  
Pyrolyx USA Indiana, LLC  
Plant ID 167-00160  
Terre Haute, Vigo County

Dear Mr. Reed:

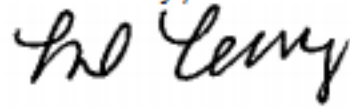
On March 26, 2020, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), received a request for an extension of compliance testing from Pyrolyx USA Indiana, LLC located at 4150 East Steelton Ave in Terre Haute, Indiana. The compliance testing is required to be conducted by 180 days after start up, which would be March 29, 2020 for Plant 1 Pyrolysis Ovens 1 through 20 (Thermal Oxidizer TO-1) and for Plant 1 Pyrolysis Ovens 1 through 20 (Desulfurization Removal System DS-1) pursuant to F167-42619-0160, Condition D.1.7(a) and (b), respectively.

According to Pyrolyx USA Indiana, LLC, the compliance testing cannot be conducted by the designated deadline because Indiana Governor's Executive Order 20-08 requiring the temporary closure of non-essential businesses. Starting March 25, 2020, Pyrolyx is closing the Terre Haute facility and will therefore be unable to perform the required testing ahead of the March 29, 2020 deadline.

At this time, IDEM cannot approve your request to extend the permitted compliance testing deadline. Testing after the date specified in the permit constitutes a violation. However, if compliance testing is adequately performed by September 25, 2020 (180-days after due date), no enforcement action will be taken for failing to test before the original deadline stated in your permit.

Please direct any questions to Tammy Haug, Compliance Inspector, at 812.380.1847 or by email at [thaug@idem.in.gov](mailto:thaug@idem.in.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Phil Perry".

Phil Perry, Chief  
Compliance and Enforcement Branch  
Office of Air Quality

PRP/tsh

cc: Tammy Haug, Compliance and Enforcement Branch, Office of Air Quality  
Mr. Dave Cline, Compliance and Enforcement Branch, Office of Air Quality



Received SWRO  
3/26/2020 via email

PyrolyxUSA Indiana, LLC  
4150 East Steelton Ave  
Terre Haute, Indiana 47805

March 24, 2020

Ms. Tammy Haug, Senior Environmental Manager  
Indiana Department of Environmental Management  
Office of Air Quality  
Southwest Regional Office  
PO Box 128  
Petersburgh, IN 47567

**Re: Request for Stack Test Extension**  
Pyrolyx USA, Indiana, LLC  
4150 Steelton Avenue  
Terre Haute, Indiana

Dear Ms. Haug:

Pyrolyx USA Indiana LLC (Pyrolyx) is submitting this request to the Indiana Department of Environmental Management (IDEM) for an extension to complete the required stack testing at our facility in Terre Haute, Indiana. As originally scheduled, Pyrolyx completed the particulate component of the testing the week of March 15<sup>th</sup> with the stack testing originally scheduled for this week.

Conditions D.1.7(a) and D.1.7(b) of our Federally Enforceable State Operating Permit (FESOP) No. F167-38034-00160 require testing to be completed on the below identified equipment in Plant 1 not later than 180 days after the startup of pyrolysis operations. The table below outlines the processes/controls and their required test dates:

Permit Condition	Process (Control)	Pollutant	Start of Operations*	Initial Test Due Date
D.1.7(a)	Plant 1 Pyrolysis Ovens 1 through 20 (Thermal Oxidizer TO-1)	VOC (DRE), VOC, CO, HAPs	10/1/2019	3/29/2020
D.1.7(b)	Plant 1 Pyrolysis Ovens 1 through 20 (Desulfurization Removal System DS-1)	SO <sub>2</sub>	10/1/2019	3/29/2020
* Start of operations for the Pyrolysis ovens is the first date that the ovens charged rubbed shred.				



Pyrolyx submitted stack test protocols on February 11, 2020 to perform testing of the ovens and their associated control devices for the week of March 23, 2020. Due to the Indiana Governor's Executive Order 20-08 requiring the temporary closure of non-essential businesses starting March 25, 2020, Pyrolyx is closing the Terre Haute facility and will therefore be unable to perform the required testing ahead of the March 29, 2020 deadline.

Given the current situation with the COVID-19 pandemic, we request an extension to complete the stack testing on the Plant 1 Pyrolysis Ovens 1 through 20. Due to the uncertainty of when operations will be able to fully resume, we are requesting that the deadline to complete the stack testing be postponed for 180-days until September 25, 2020. We propose to resubmit the previously accepted testing protocols 35-days prior to the intended test date once those dates have been confirmed with our stack testing consultant.

We appreciate IDEM's consideration of this request at a trying time for both the people of the State and our company. If you have any questions, please contact me at (302) 295-1370 or [tomr@pyrolyxusa.com](mailto:tomr@pyrolyxusa.com), or Jason R. Krawczyk of ERM at (317) 942-7185 or [jason.krawczyk@erm.com](mailto:jason.krawczyk@erm.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas N. Redd".

Thomas Redd  
Manager

Cc: Al Ogden, Pyrolyx  
Jerod Kizer, Pyrolyx  
Jason Krawczyk, ERM  
JD Haines, EarthCon