



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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**Eric J. Holcomb**  
*Governor*

**Bruno L. Pigott**  
*Commissioner*

April 17, 2020

Anoop Balakrishnan, Environmental Engineer  
Harrison Steel Castings Co.  
900 Mound Street  
Attica, IN 47918  
[balakrishnana@hscast.com](mailto:balakrishnana@hscast.com)

Re: Stack Test Extension Response Letter  
Harrison Steel Castings Co.  
Plant ID 045-00002  
Attica, Fountain County

Dear Mr. Balakrishnan:

On April 14, 2020, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), received a request for an extension of compliance testing from Harrison Steel Castings Co. (Harrison) located at 900 Mound Street in Attica, Indiana. The (PM or Total Metal HAPs) and opacity compliance testing is required to be conducted by June 10, 2020 for the melting process controlled by rooftop monitor baghouse DC42 pursuant to 40 CFR 63.7690 and Permit T045-38609-00002, Condition E.4.2(5).

According to Harrison, the compliance testing may not be conducted by the designated deadline due to uncertainties in staffing and demand associated with the COVID-19 situation.

Thank you for your notification. In the instance that noncompliance is unavoidable directly due to impacts from COVID-19, IDEM will exercise enforcement discretion as appropriate. See IDEM's Enforcement Discretion, Extension of Submission Deadlines, and Waiver of Specific Regulations [https://www.in.gov/idem/files/coronavirus\\_enforcement\\_discretion.pdf](https://www.in.gov/idem/files/coronavirus_enforcement_discretion.pdf), IDEM's Written Correspondence and Electronic Signature Guidance <https://www.in.gov/idem/files/written%20correspondence%20and%20signature%20guidance.pdf>, and EPA's temporary policy regarding enforcement of environmental legal obligations titled COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program guidance <https://www.epa.gov/sites/production/files/2020-03/documents/oecamemooncovid19implications.pdf>.

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 Harrison performs the required compliance testing by November 7, 2020, no enforcement action will be taken for failing to test before the original deadline stated in your permit.

Please direct any questions to Wyman Clark, Compliance Inspector, at 317-232-8441 or by email at [wclark@idem.in.gov](mailto:wclark@idem.in.gov).

Sincerely,



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

cc: Wyman Clark, Air Compliance Section 1, Office of Air Quality  
Mr. Dave Cline, Compliance and Enforcement Branch, Office of Air Quality

**From:** Anoop Balakrishnan [mailto:balakrishnana@hscast.com]

**Sent:** Tuesday, April 14, 2020 11:45 AM

**To:** Clark, Wyman <WClark@idem.IN.gov>

**Subject:** FW: Extension request

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Hello Mr. Clark,

The Harrison Steel Casting Company submitted protocol to conduct stack testing for DC 42 on May 6<sup>th</sup> and 7<sup>th</sup>. We are not sure if we can perform the test on those days with the Covid situation uncertainty. We have issues with staffing and also believe we might start to see lower production. Considering the unprecedented situation we request an extension for six (6) months and will perform the testing at the first available opportunity. Please let me know if any additional paper work needs to be completed to consider this request.

Thanks

Anoop