

Via Email (dcline@idem.in.gov) & (dzier@idem.in.gov)

Mr. Dave Cline and Mr. David Zier
Indiana Department of Environmental Management
Air Compliance, Office of Air Quality
100 North Senate Avenue
MC 61-50, IGCN 1003
Indianapolis, IN 46204-2251

May 14, 2020

Evonik Corporation
Tippecanoe Laboratories
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Clive.Whiteside@evonik.com

RE: Evonik Corporation Tippecanoe Laboratories, Source ID 157-00006,
Pandemic-based request to postpone the T149 Comprehensive
Performance test (CPT).

Dear Sirs,

Pursuant to IDEM's May 4, 2020 COVID-19 statement and the test extension provisions in NESHAP Subparts A and EEE, Evonik Corporation Tippecanoe Laboratories (Evonik) located in Lafayette, IN, is requesting a ten (10) month extension for the commencement date of the Comprehensive Performance Test (CPT) for the solid-liquid kiln incinerator known as T149. This extension request is warranted due to the following conditions:

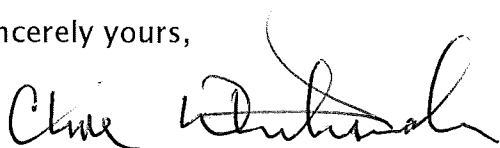
- 1) COVID-19 is an ongoing pandemic with an outcome, impact, and end date that is unfortunately not known. A patchwork of federal, state, and local orders currently and for the foreseeable future will restrict movement of personnel and goods essential to Evonik's operations. There are strong indications that the COVID-19 pandemic will not be under control until 2021 at the earliest.
- 2) Evonik is taking every reasonable step it can to protect its employees and their families. Evonik has implemented strict requirements for social distancing and limited the number of employees and contractors on-site to minimize interface points to prevent the spread of COVID-19. The CPT plan for the solid-liquid kiln incinerator requires at least nine highly skilled Evonik operators from multiple shifts and support staff working in close proximity with outside testing personnel in order to execute properly. Given the continuing spread of the virus locally and beyond, we cannot be assured that these individuals will be available for the testing.
- 3) We have been informed by both of our caustic suppliers that our site is on a limited allocation for an undetermined amount of time. Pharmaceutical grade caustic is critical for the entire site's operations. The CPT will consume up to 14,000 gals/day during testing. Normal use is in the range of 100 gal/day. According to our suppliers, they will not be able to cover this additional level of demand.

- 4) We estimate this testing will require at least five contractors in addition to the Evonik employees. These additional outside personnel would be required to be on site the duration of the testing, which is estimated to be four days. The site produces lifesaving pharmaceuticals for the population and cannot risk being shut down because of the virus. To ensure patients receive those Evonik-manufactured medications, the site has instituted extremely strict access protocols. Bringing in the testing personnel and outside equipment unnecessarily puts the site and our employees at risk.
- 5) During the time of the extension, the unit (which only operates 15–20 days per quarter anyway) will continue to be operated in compliance with all permit conditions, including emissions control and recordkeeping. Evonik is not requesting the suspension or delay of any compliance, monitoring, recordkeeping or other requirements beyond this 10-month extension for performing the CPT testing.

In accordance with permit condition D.13.13(c), the T149 CPT must commence by November 21, 2020. Based on the above conditions, Evonik is requesting a new test date no later than September 21, 2021. The current plan is to perform the pre-testing in April of 2021 and the CPT in July of 2021. The additional time is to allow for potential delay. This request is being made under IDEM's May 4, 2020 COVID-19 statement and under the force majeure and test extension provisions found at 40 CFR 63.2, 63.7(a), and 63.1207(i) (allows extension up to one year).

If you have any questions, please contact Dillon Dishon at 765-477-4759. Please stay safe and healthy and help Evonik do the same for its employees and their families. We look forward to hearing from you.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Clive Whiteside". The signature is fluid and cursive, with a large initial "C" and "W".

Clive Whiteside
Vice President and Plant Manager
Evonik Corporation Tippecanoe Laboratories