

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb

Governor

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Commissioner

May 6, 2020

Bill Bougher, Environmental Engineer Steel Dynamics, Inc. – Flat Roll Group 4500 County Road 59 Butler, IN 46271 Bill.Bougher@steeldynamics.com

Re: Opacity Certification Extension

Response Letter

Steel Dynamics, Inc. - Flat Roll Group

Plant ID 033-00043 Butler, DeKalb County

Dear Mr. Bougher:

On May 5, 2020, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), received a request to temporarily allow visible emission observations to be conducted by observers whose certifications had expired from Steel Dynamics, Inc. – Flat Roll Group (FRG) located at 4500 County Road 59, Butler, Indiana.

FRG typically complies with 40 CFR 60.273a(d) and Permit T033-41900-00043 Condition D.1.18(4) by making daily observations of shop opacity by a certified visible emission observer in accordance with EPA Method 9. Method 9 certifications are only valid for 6 months. FRG's current Method 9 certifications will expire in May, 2020.

According to FRG, due to the COVID-19 situation, its consultant, AeroMet Engineering, Inc. (AeroMet), has postponed an on-site smoke school (Method 9 certification) course scheduled for May, 2020. It is unclear when AeroMet will be able to reschedule the course. In the meantime, FRG plans to continue to conduct Method 9 visible emissions observations using employees who have been previously certified.

At this time, IDEM cannot approve your request to conduct visible emissions observations utilizing observers with expired certifications. This will constitute a violation. However, if FRG conducts Method 9 visible emissions observations using employees who have been previously certified and if the visible emissions observers are recertified in or before November, 2020, no enforcement action will be taken for conducting visible emissions observations utilizing observers with expired certifications.



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

Sincerely,

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

с С Wyman Clark, Air Compliance Section 1, Office of Air Quality