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June 11, 2020

Via Email and U.S. Mail

Patrick Burton & Dave Cline Office of Air Quality, Indiana Department of Environmental Mgmt 100 North Senate Ave. MC 61-53 IGCN 1003 Indianapolis, IN 46204-2251

New Haven, Indiana 46774

RE: Superior Aluminum Alloys, LLC Permit No. T003-40531-00286 Request for Stack Test Enforcement Discretion

Dear Mr. Burton and Mr. Cline:

Superior Aluminum Alloys, LLC (SAA) is required to perform PM/P10/PM2.5, NOx testing under Permit Number T003-40531-00286 as well as Dioxin/Furan and HCL testing under NESHAPs Subpart RRR for Furnace 5 which was permitted to construct in 2018. IDEM was notified that the installation and initial startup of Furnace 5 occurred on December 17, 2019. SAA was still in the process of commissioning and ramping up to normal operating conditions through February, including working out matters typically associated with operational startups, when the COVID-19 Pandemic lockdown extremely curtailed production at the facility. Due to lack of aluminum production, Furnace 5 had not been operating for many weeks prior to the scheduled performance test, meaning the facility could not complete its full ramp-up to normal operation.

On June 9, 2020, an attempt was made to perform these tests under maximum production rates, however SAA experienced aluminum production and process related issues and could not perform the testing. The deadline to complete the test within one hundred eighty (180) days will expire on June 17, 2020 therefore SAA requests that IDEM exercise its enforcement discretion until August 31, 2020 to allow SAA to complete the testing. SAA is hopeful that aluminum production will come back to normal levels in the next few months which will allow the facility to get Furnace 5 up to normal levels of production.

Sincerely,

Dave Centeno Environmental Manager Superior Aluminum Alloys, LLC (574) 534-3435 ext. 6