



October 3, 2022

ATTN ANDY MURDOCK
PB LEINER USA
PO BOX 2807
DAVENPORT IA 52809

Notice of Violation: Fugitive Dust - Paragraph 567 IAC 23.3(2)"c"
Failure to Maintain Control Equipment 567 IAC 24.2(1

RE: Air Compliance Evaluation / Complaint Investigation
Facility No. 82-01-064
Title V Permit No. N/A
Complaint ID: 31314

Dear Mr. Murdock:

On September 23, 2022 this office received another complaint via the United States Environmental Protection Agency regarding the PB Leiner USA facility located at 7001 N. Brady Street in Davenport, Iowa. The complaint alleged that the plant sprayed all over vehicles on September 20, 2022. The complaint indicated that it was not an isolated event and that the material was hard to remove.

I met with you at the facility on Tuesday, September 27, 2022 to investigate the complaint. During that time, I also followed up on the status of the requirements from the August 24, 2022 Notice of Violation (NOV). While at the facility I was able to observe noticeable particulates on the vehicles even though there had been at least two rain events since September 20, 2022. I also inquired about any upsets or maintenance issues with the control equipment. Review of magnahelic records indicated that there was no checklist of magnahelic records for the date of the incident mentioned in the complaint (September 20, 2022). Furthermore, records from September 21 and 22 indicated that the Dust Collector No. 1, which corresponds to EP-3, indicated that the magnahelic readings were 0.75 inches of water which was below the lower boundary of the operating range of 1 to 4 inches of water for the unit. I had requested information on any work orders for the control equipment that were done based on the equipment being out of the operating range and you were not able to provide any information on inspection and/or repairs of the equipment.

As far as the recent emissions, you indicated that you believed they may be caused by the Mix Lot Suckup Dust Collector (EP-15) since the last time the cartridges were replaced in this unit was in 2019. You also indicated in your September 30, 2022 letter that PB Leiner has ordered replacement cartridges (19 Pleated Filter Element Cartridges - BA650 Model Loading Spunbond Pleated Filter with a Polyurethane Top and Bottom and Galvanized Metal Core, 45 Pleats) and you anticipate these cartridges being received and installed in the next 2 to 3

weeks. You also indicated in the letter that if the new cartridges do not fully address the issue then you discussed with the distributor of using MERV 16 rated cartridges but that the distributor indicated that an engineer would need to review the specs before using them and that you will explore that possibility if it becomes necessary.

Paragraph 567 IAC 23.3(2)"c" states, in part, that no person shall allow, cause, or permit material to be handled, transported or stored... with the exception of farming operations or dust generated by ordinary travel on unpaved roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance.

Subrule 567 IAC 24.2(1) specifies that equipment and control equipment must be maintained and operated in a manner consistent with good practice for minimizing emissions and that any cause of excess emissions must be remedied expeditiously.

Finally, please be advised, incidents causing excess emissions, must be reported the regional field office. The following two rule citations explain the requirements for reporting excess emissions. While I was unable to determine if there was an excess emission based on opacity, if there are reports of particulates getting onto the cars that would be an indicator that excess opacity is occurring in the case of Emission points EP-3, EP-4 and EP-5, which have an indicator opacity of 0% (no visible emissions).

Subrule 567 IAC 24.1(2) requires the oral reporting of incidents of excess emission to the appropriate regional office of the DNR within 8 hours of the incident or at the start of the first working day following the onset of the incident.

Subrule 567 IAC 24.1(3) requires a written report of each incident of excess emission to be submitted to the appropriate regional office of the DNR within 7 days of the incident. The specific information to be included in the written report is contained in paragraphs 567 IAC 24.1(3)"a" through 567 IAC 24.1(3)"g". Notify this office in writing by as soon as the bag house repairs occur and how you intend to comply with the aforementioned requirements of general equipment maintenance and reporting of excess emissions.

The prior Notice of Violation (NOV) dated August 24, 2022 required that the facility develop an operations and maintenance (O&M) plan for all control units to prevent similar occurrences from happening in the future. You indicated at the time of my visit that you would not be able to meet the September 30, 2022 deadline due to the time needed to evaluate permits, reviewing current O&M plans, and developing and/or alternating current plans. However, you have met the other requirements of the prior NOV. Furthermore, the facility has been taking steps to try to remedy the gelatin dust issues. Because you have met the other requirements of the prior NOV, and the facility has been working to address the complaints with respect to the gelatin dust, this office will extend the deadline for the completion of the Operations & Maintenance Plan for the facility to November 15, 2022.

Please notify this office as soon as possible, but no later than November 15, when the following items have been addressed:

1. The facility has developed a comprehensive operations and maintenance plan for all of the control units.
2. The facility has received and installed the new cartridges for the Mix Lot Suckup Dust Collector (EP-15).

I plan to do a follow up visit to the facility, preferably after the new cartridges have been installed and the O&M plan has been finalized.

Please note that continued violations may result in requiring the facility to have stack testing done and permits modified accordingly and/or referral to DNR's Legal Services Bureau in Des Moines for additional enforcement action and monetary penalties.

Your cooperation and assistance in investigating the complaint was appreciated. If you have any questions or would like further explanation of any part of this letter, please contact me at 319-653-2135 or Jon.Ryk@dnr.iowa.gov.

Sincerely,

FIELD SERVICES & COMPLIANCE BUREAU



Jon Ryk
Environmental Specialist

JPR: N:\Environmental Services\Field Services\ESD06-Wash-Fo6\JRYK\AQ\2022\PB Leiner Complt received 9-23-22\10-03-22 PB Leiner NOV - Complaint 31314.docx

Encl. 1) Site Photographs 2) Aerial Photo of Facility

Pictures: PB Leiner - Davenport 7-27-22 (1)-(4)

xc: AQB - DNR, Des Moines (w/ all encl)
FO6 AQ File - PB LEINER USA, DAVENPORT, IA (w/all encl)

Site Photographs



View of dust on vehicle to the north of the PB Leiner Offices.



View of dust on vehicle to the north of the PB Leiner Offices.



View of dust on vehicle to the north of the PB Leiner Offices.



View of dust on vehicle to the north of the PB Leiner Offices.

Aerial Photo of Facility

