



September 27, 2022

FAIRCAST INC
ATTN TIM NEUMANN PRESIDENT
905 WEST DEPOT
FAIRFIELD IA 52556

Notice of Violation: Maintenance, 567 IAC 24.2(1)
Excess Emission Oral Reporting, 567 IAC 24.1(2)
Excess Emission Written Reporting, 567 IAC 24.1(3)

RE: Air Quality Complaint Investigation - Complaint No. 31193
Air Quality Facility No. 51-01-005
Title V Operating Permit #99-TV-058R3

Dear Mr. Neumann:

On August 29, 2022, this office received complaints indicating that Faircast, Inc was not operating or maintaining air quality control equipment as originally permitted and the emissions were impacting nearby properties. On September 1, 2022, Carrie Davis contacted Dean Jensen regarding the complaint and investigated the situation further. Mr. Jensen provided Carrie Davis a tour of the cupola baghouse (EP #201), which was the source of the excess emissions and they discussed the intended repairs of the cupola baghouse. We have discovered that these excess emissions from the cupola baghouse go back to early August and possibly into July, 2022 and we were not properly notified of the excess emissions nor the baghouse malfunction.

Note that 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. I would strongly encourage you to have extra filter bags for dust collectors, or other means to repair equipment readily when issues arise to immediately address, or consider shutting down the equipment until issues are completely repaired. All of these repairs need to be recorded and tracked to demonstrate compliance. In addition, if these equipment issues meet the reporting criteria of an excess emission, please provide those verbal excess emission notifications and written excess emission reports as needed.

Finally, please be advised, incidents causing excess emissions, must be reported to the regional field office, which in this case, was not timely. The following two rule citations explain the requirements for reporting excess 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"

Based upon these complaint investigations, Faircast must:

1. Comply with excess emission reporting requirements, both verbal and written.
2. Make the necessary repairs to the cupola baghouse as soon as possible.
3. Submit an excess emission written report to DNR Field Office 6 including the efforts that you have taken to address and repair in the interim of the cupola baghouse by **October 5, 2022**.

I appreciate your willingness and expedited efforts to address these issues. If you have any questions or would like further explanation of any part of this letter, please contact me at 319-653-2135 or email ryan.stouder@dnr.iowa.gov.

FIELD SERVICES & COMPLIANCE BUREAU



Ryan Stouder
Environmental Specialist Senior

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xc: - IDNR AQ Bureau, Wallace Bldg, Des Moines (via email)
- AQ TV File – Faircast Inc.