



July 5, 2023

SIVYER STEEL CASTING, LLC  
ATTN: TIM MURRAY  
225 SOUTH 33<sup>RD</sup> STREET  
BETTENDORF, IA 52722

**Notice of Violation:** Maintenance, 567 IAC 24.2(1)

RE: Complaint Investigation #32295 and follow up

Dear Mr. Murray:

On May 24, 2023, I conducted an air quality complaint investigation visit to discuss the nature of the complaint and the source of fugitive dust emissions. I met with you and you provided me a tour of the facility with a focus upon the baghouses. While we were discussing the operation and cleaning of the air quality control equipment, I observed visible emissions coming from the north baghouse. The contractors on site were repairing the baghouses. The production managers were not available to verify the maintenance and cleaning efforts.

On June 12, 2023, I returned to the facility to follow up on the maintenance efforts. I met with Stacy Braden - Director of Operations and Brenden Goellnitz. Mr. Goellnitz provided the daily records of visible emission checks and a variety of other documentation. You and I walked the outside of the facility where I observed that EP 4 - No Bake and No Shake Out was running and the magnehelic gauge was off the scale indicating over 8 and EP 3 - No Bake Screen was not running and was holding at 4. Both of these gauges need to be investigated and verify the necessary repairs are conducted and documented within the Odyssey work order system. You also indicated that you would relay back to maintenance that necessary repairs must be made immediately.

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.  
**VIOLATION:** By failing to "maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions", Sivyver Steel violated 567 IAC 24.

Finally, please be advised, incidents causing excess emissions, need be reported the regional field office. 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". Please 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.*

As a reminder, 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 (See attached rules).

**REQUIREMENTS:**

Please submit the following documents to DNR Field Office 6 by **August 1, 2023:**

1. manufacturer's specifications or operating manuals for the baghouse,
2. a statement of Sivyer Steel's intention to comply with the baghouse inspection, ongoing maintenance and documentation, which shall include a maintenance plan meeting the specifications of 567 IAC 24.2(2), and consisting of but not limited to the following:
  - a. A complete preventive maintenance schedule, including identification of the persons responsible for inspecting, maintaining and repairing control equipment, a description of the items or conditions that will be inspected, the frequency of these inspections or repairs, and an identification of the replacement parts which will be maintained in inventory for quick replacement;
  - b. An identification of the equipment and air pollution control equipment operating variables that will be monitored in order to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring and surveillance procedures; and
  - c. A contingency plan for minimizing the amount and duration of any excess emissions to the maximum extent possible during periods of such emissions.

Please notify this office as soon as the baghouse and filters have been repaired and that no further visible emissions are being emitted, but no later than **August 1, 2023.** A follow-up visit will be conducted to verify compliance.

If you have any questions or would like further explanation of any part of this letter, please contact me at 319-653-2135.

Sincerely,

FIELD SERVICES & COMPLIANCE BUREAU



Ryan Stouder, Environmental Specialist Senior

N:RDS\Air\Sivyer Steel AQ NOV 061223

Encl: Fugitive dust regulations

xc: IDNR AQ Bureau, Wallace Bldg, Des Moines  
AQ FOCD Compl# 32295- Sivyer Steel - Scott County