IOWA DEPARTMENT OF NATURAL RESOURCES
FIELD SERVICES AND COMPLIANCE BUREAU
FIELD OFFICE #2 - MASON CITY IOWA

DATE: **September 23, 2024**

TO: **The Record**

FROM: **David Knoll**

SUBJECT: **Five Star Coop - Klemme Fugitive Dust Complaint (#34060)**
205 1st Street, Klemme, IA

On September 12, 2024, this office received a complaint from Wendell Ulrich (111 Railroad Street, Klemme) stating that whenever a truck, tractor, or semi drives through the parking lot it causes a huge cloud of dust that goes all over town. Wendell requested someone stop at his house to talk. It is noted the complaint was in conjunction with a separate dust complaint (#34061) Wendell lodged against NEW Coop at the same time.

I was assigned the complaint on September 17th and investigated the complaint on September 20th, 2024. There had been little to no measurable precipitation for several days prior to my investigation. Upon arriving at the Five Star facility, I observed that there was minimal truck traffic occurring. One semi-truck was observed pulling into the loadout/receiving bay, which caused minimal dust to occur. No fugitive dust was observed leaving the property and no dust violations were observed at the facility (Photo 1).

I stopped in the office and no one was present. I left a copy of the fugitive dust rule along with my card and a note requesting a return call. Upon leaving the office, I met an employee (Zach) who explained the location manager was not currently there. I explained the reason for my visit and Zach asked if it would be OK for the manager to give me a call later that afternoon or Monday, and I stated Monday was fine.

Following my visit to the Coop, I proceeded to Wendell's residence. In walking to his door, I did not observe visible evidence of dust accumulation on outside surfaces of his property. The lawn also did not appear to be abnormally dusty while walking through it. I spoke with Wendell about his complaint and he reiterated the truck traffic, especially from the corner SW of the bin, created a big cloud of dust that went all over town.

Wendell then showed me a glass patio table in his yard that had minor dust accumulation (Photo 2). I agreed there was some dust present on the table surface but noted other surfaces, such as the nearby trampoline, appeared to not have any dust (Photo 3). Wendell stated the trampoline had been kept covered with a blanket until very recently. I advised that the fugitive dust rule requires a party to take "reasonable precautions" to control dust from leaving the site and accumulating to nuisance conditions. It is therefore a somewhat subjective call that is made on a case-by-case basis. I explained I did not observe a violation at this time. I provided my card and Wendell stated he was surprised someone had actually came to look at it and seemed appreciative of that.

On Monday, September 23, 2024, I spoke with location manager Kevin Lang. I explained the complaint and asked if the facility had historically used any dust control. Kevin stated they had not. He commented that controlling dust at a facility such as theirs would not be practical,

especially with increased traffic from harvest. I explained the expectation is that precautions be taken to limit dust, not eliminate it. I also advised that I had not currently documented a violation of the rule, however, recommended they consider taking a proactive approach such as applying a dust suppressant. Kevin stated he would get a quote for having a dust control application made. No further action required at this time.

DK



Photo 1: Five Star Coop facility grounds shown in background, taken from the Ulrich property. No fugitive dust at time of inspection. Looking NE (9/20/24).



Photo 2: Glass patio table in front yard of Mr. Ulrich's property, minimal dust visible on surface. (9/20/2024)



Photo 3: Trampoline in front yard of Mr. Ulrich's property, no dust visible on surface. Looking E (9/20/2024)