



Heidelberg Materials North America
300 E. John Carpenter Fwy
Irving, TX 75062

October 24, 2023

Compliance Unit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
Wallace Bldg., 502 E. 9th St
Des Moines, IA 50319

Received

OCT 30 2023

Iowa Department of Natural Resources
Attn: David Knoll
Field Office #2
2300 15th St. SW
Mason City, IA 50401

Iowa DNR
Field Office #2

Subject: Excess Emissions Reports October 2023

Dear Compliance Unit Supervisor and Mr. Knoll,

Heidelberg Materials f/k/a Lehigh Cement Company LLC is submitting this written report of excess emissions as required by IAC 567—24.1(3). There were multiple instances of excess emissions: one occurrence on 10/12/2023 when the 30-day rolling average was exceeded, and 7 hours on 10/12/2023, one hour on 10/16/2023 and 7 hours on 10/17/2023. The Excess Emissions was confirmed 10/19/2023 by email. A 48-hour notification was submitted to DNR and EPA on October 13, 2023 indicating the 30-day rolling average was exceeded and stack testing is scheduled for November 1 and November 2, 2023.

- a) **Equipment** - EU25 Kiln/Calciner/Preheater, EP25
- b) **Quantity of Excess Emissions** – This was an exceedance of the 15% (1-hr average) opacity limit as monitored by the continuous parametric monitoring system (CPMS). The monitored values are shown below with dates and times. There is an established limit of 13.0 mA, per the Title V permit, 04-TV-001R2, Continuous Emission Monitoring, Section A. This limit is required to demonstrate compliance with the opacity standard, not the PM lb/ton values. Therefore, there is no correlation or calculation to determine the lb/ton PM values from this mA limit.

- c) **Time and Duration of Excess Emissions** – An email sent on Oct 19, 2023, at 6:18AM had different PM mA numbers, due to data not being pulled from the DAS. After a throughout review, the corrected dates and times are below.

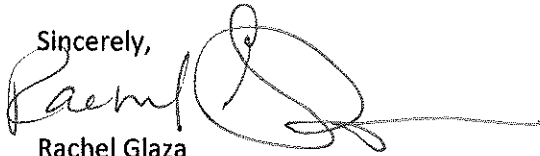
Date/Time (Time behind 1 hour due to daylight savings time)	KILN: PM_MA (MA)
10/12/2023 15:00	16.3
10/12/2023 16:00	19.4
10/12/2023 17:00	19.8
10/12/2023 18:00	20.0
10/12/2023 19:00	20.0
10/12/2023 20:00	19.9
10/12/2023 21:00	19.0
10/16/2023 22:00	13.8
10/17/2023 3:00	13.5
10/17/2023 4:00	19.8
10/17/2023 5:00	18.6
10/17/2023 6:00	20
10/17/2023 7:00	20
10/17/2023 8:00	20
10/17/2023 9:00	20

- d) DNR Field Office #2 staff observed visible emissions from the stack on 10/16/2023 at 2PM.
- DNR conducted a second observation on 10/17/2023, in which no excess emissions were observed.
- e) **Cause of Excess Emissions** – Initial inspection of the ESP operations did not show any concerns with the ESP. Therefore, it was assumed there was something wrong with the PM-mA monitor. The monitor was cleaned and recalibrated to confirm it was reading accurately. A more detailed inspection, including internals, was performed and additional work was done on the ESP. On 10/17/2023 a motor for one of the rappers on top of the second field was replaced in the ESP. On 10/18/2023 one of the rotary valves under the ESP was repaired.
- f) **Steps Taken to Remedy the Excess Emission** – Inspections and additional repairs to the ESP

- g) **Steps Taken to Limit Excess Emissions During the Interim Period** – Kiln clinker production was reduced.

Please let me know if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rachel Glaza', with a long horizontal flourish extending to the right.

Rachel Glaza
Environmental Manager

Heidelberg Materials
700 25th ST NW
Mason City, IA 50401