



December 23, 2020

MICHAEL BURKHART
LEHIGH CEMENT COMPANY LLC
700 25TH ST NW
MASON CITY IA 50401

Subject: Compliance Plan Required
Facility #17-01-005; Complaint ID: 29028

Dear Mr. Burkhardt:

On December 14, 2020, this office responded to a complaint at Lehigh Cement Company that alleged EP 25 was in poor condition and causing air quality and water quality violations. During the investigation it was revealed there had been some maintenance issues that caused particulate laden scrubber water to be emitted from EP 25 on more than one occasion in the past few weeks.

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.

In light of the recent scrubber malfunctions, the Field Office is requiring the facility submit a Compliance Plan to this office by January 8, 2021.

The Compliance Plan must include:

- A detailed timeline describing the events that took place on December 3rd and December 11th, 2020, and the actions taken to temporarily remedy the scrubber issues.
- The steps you have taken or will take to ensure control equipment associated with EP 25 is fully repaired and functioning properly, and a timeline for these activities.
- A record of all inspection and maintenance activities for EP 25 over the last 12 months.

Paragraph **567 IAC 25.1(7)"c"** specifies the department may require the owner or the owner's authorized agent to conduct an emission test on any equipment if the director has reason to believe that the equipment does not comply with applicable requirements.

The Field Office is not requiring stack testing for this equipment at this time. However, this does not preclude either the Field Office, or the DNR Air Quality Bureau, from requiring compliance demonstrations in the future.

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If you have any questions or comments you may contact me at 641-529-6488 or
kayla.beck@dnr.iowa.gov.

Sincerely,

FIELD SERVICES AND COMPLIANCE BUREAU

A handwritten signature in black ink that reads "Kayla Beck". The signature is written in a cursive, flowing style.

Kayla Beck
Environmental Specialist

Enclosures: Subrule 567 IAC 24.2(1)
Paragraph 567 IAC 25.1(7)"c"

c: Brian Hutchins, DNR Air Quality Bureau