

Lehigh Cement Company LLC
MASON CITY PLANT
700 25th Street NW
Mason City, IA 50401
Phone: (641) 421-3400
Fax: (641) 421-3444
www.lehighhanson.com

January 6, 2021

Kayla Beck
Iowa Department of Natural Resources, Field Office #2
2300 15th St SW
Mason City, IA 50401
Sent via Email

SUBJECT: RESPONSE TO REQUEST FOR COMPLIANCE PLAN, FACILITY #17-01-005

Dear Ms. Beck:

This is in response to your letter dated December 23, 2020 ("letter") requesting that the Lehigh Cement Company LLC (Lehigh) provide additional information regarding recent operational issues with the wet scrubber associated with EP-25. The letter was a follow-up to a site visit conducted December 14, 2020 by IDNR Field Office #2.

It is important to note that no air quality nor water quality violations occurred, as alleged in your letter. Lehigh acknowledges the EP-25 wet scrubber was not operating optimally during the period in question, but no excess emissions occurred and the performance of the air pollution control device certainly would not impact the quality of any water being discharged from the property. Additionally, as observed during the site visit, the stormwater basins in the vicinity were dry and contained no evidence of contamination. At the conclusion of the inspection, you requested hourly NO_x and SO₂ CEMS and PM CPMS data, which was provided to you on December 15. Lehigh trusts your review of this data demonstrates that no excess emissions occurred.

Actions Taken on 12/3 and 12/11/2020

As noted, Lehigh acknowledges the recent wet scrubber operational challenges that had occurred, and Lehigh has taken proactive measures to address those challenges. The kiln/calcliner/preheater and raw mill, all of which exhaust through EP 25, were taken down on December 3 to inspect the associated wet scrubber. It was discovered that four of the demister plates had shifted out of position, and alignment of the plates was corrected immediately. The same systems were again taken down on December 11 to allow for inspection of the bottom level of demisters. This subsequent inspection discovered that this level of demisters was compromised, and temporary replacements were fabricated and installed. The kiln system also experienced downtime on December 18 and December 30, 2020 for unrelated operational issues. The opportunity was taken on these days to, again, inspect the wet scrubber. These