



January 31, 2024

MIKE BUSH PRESIDENT  
LINWOOD MINING AND MINERALS CORP  
401 E FRONT ST  
DAVENPORT IA 52804

**Re: Linwood Mining and Minerals Corp. (401 E Front St, Davenport, IA 52804)  
Comments to Exhaust, Exhaust-Related Material, and Lime Kiln Dust (LKD) Deposition in Mine Stope  
(Doc #108390) - Revised**

Dear Mr. Bush:

The Iowa Department of Natural Resources (DNR) has conducted its review of the Action Plan for Exhaust, Exhaust-Related Material, and Lime Kiln Dust (LKD) Deposition in Mine Stope (Action Plan) submitted by Linwood Mining and Minerals Corp. (Linwood) in response to the DNR's September 8, 2023 (Doc #107740) correspondence. Our comments are as follows.

For ease of reference, our comments are provided under the option headings used in the submitted Action Plan.

*This letter was originally issued on January 24, 2024 and is hereby revised to change the document reference in the subject line from Doc #10858 to Doc #108390. Changes have been italicized and underlined. No other changes have been made to this document.*

**Option No. 1 – Install a New Bag House**

The Action Plan stated that "Carmeuse has applied for an air construction permit to install a new bag house that would eliminate the need to vent the lime kilns through the mine stope." However, in our conversations with the DNR's Air Quality Bureau staff, they provided the following based on Carmeuse's proposal, which shows that after the completion of new controls for Kiln 4, that Kiln 3 will still discharge into the mine stope.

- Kiln 4. Discharge into the mine stope will be discontinued after completion of new controls are completed by Carmeuse.
- Kilns 1 & 2. Operation of these kilns must be discontinued within 180 days of completing the new controls for Kiln 4.
- Kiln 3. Proposed to continue operating and discharging into the mine stope.

Therefore, we are requesting a schedule for the expected completion of the new controls for Kiln 4. We are not expecting a schedule to a day or even a month, but instead would like to know if it is the end of this year or next year.

Similarly, we request a schedule for discontinuing discharge for Kiln 3 into the stope. As discussed at our prior meeting(s), we expect this to occur within the next 5 years or so.

Please provide the above schedules on or before March 15, 2024.

**Option No. 2 – UIC-5 Permit**

Although the Environmental Protection Agency (EPA) concurs with your statement in the Action Plan on this matter, they noted that Linwood would have to change *“their operations to be under the purview of the UIC program... we’d be hesitant to consider such approval until the current investigations are concluded and we have a clear idea of what is occurring in the subsurface. So, while we would consider a request for a UIC operating permit we couldn’t do so with how the operations are currently run.”*

Therefore, not only is this option dependent on the groundwater assessment of the mine stope, but it is also dependent on Linwood changing operations. Consequently, we do not feel this is a viable option to include in the Action Plan at this time. The DNR would consider this option if the operational concerns of the EPA are further investigated and committed to by Linwood as well as a suitable outcome of the groundwater assessment.

If you have any questions, you may contact me at [\(515\) 537-4051](tel:5155374051) or [brian.rath@dnr.iowa.gov](mailto:brian.rath@dnr.iowa.gov).

Sincerely,

Brian L. Rath, P.E.  
Environmental Engineer Senior  
Land Quality Bureau

cc: Darin Osland, Environmental Manager  
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Iowa DNR Field Office #6, Washington