

April 10, 2026

Iowa Department of Natural Resources
Field Office #5
6200 Park Avenue, Suite 200
Des Moines, IA 50321

RE: Response to Letter of Noncompliance; Stockpile Size and Fire Lane Requirements [567 IAC 117.6(455B&D)]
Tire Processing Facility – Permit No. 77-WTM-01-96P-PRT
Inspection Date: March 3, 2026

Dear Mr. Gross,

Liberty Tire Recycling (“Liberty”) submits the following response to the Iowa DNR Letter of Noncompliance dated March 11, 2026. The items below address the findings identified during the March 3, 2026, inspection. Liberty’s responses and corrective actions have either been completed or are actively in progress, as described.

1. Site Grading / Standing Water (IAC 567.117.6(2)a)

Recent snowmelt resulted in temporary ponding in the northwest unloading area. A pump equipped with filtration bags was already in use at the time of inspection.

Liberty’s response and corrective actions:

- Natural slope of property diverts storm water to collection areas.
- Standing water is pumped out as weather conditions allow.
- Filtration bag system continues to be used and maintained.
- Daily sweeping of catch basin area minimizes retention of solids and ponding of water.
- Photo documenting the area following corrective action is included.

Liberty will continue to monitor this area and maintain proper drainage controls to prevent future standing water.

2. Required Signage (IAC 567.117.6(2)d)

On-site perimeter signage: posted every 100’ for on-site visibility. Signage must state “Open Burning Onsite Prohibited” and “Highly flammable materials on-site. Burning in area not recommended”

Liberty’s response and corrective actions:

- All perimeter signs with required verbiage have been installed.
- Email Correspondence/Purchase Order and sign proofs are included.

Perimeter signage:

Liberty acknowledges the regulatory language requirement and will ensure signage meets requirements.

3. Processed Tire Pile Size – Shredded Tire Material ≤ 9 ” (IAC 567.117.6(4)c)

One processed tire pile located north of the building exceeded the maximum allowable pile height at the time of inspection.

Liberty’s response and corrective actions:

- Liberty is in the process of shipping material off-site.
- A purchase order is expected for removal of a significant portion of the existing DFM/TDF pile. Removal is anticipated within 50 days.
- See internal email correspondences regarding Holcim Cement’s pending order for TDF.
- The pile height is being actively reduced by spreading material and limiting additional accumulation.
- Pile will be compliant with permit parameters within 50 days or sooner.
- Follow up photos will be provided upon DFM/TDF pile being compliant.

LIBERTY TIRE RECYCLING, LLC

UMW REGION OFFICE

12498 WYOMING AVE, SAVAGE MN 55378

Direct: (952) 808-3401 | Fax: (952) 894-5061



4. Processed Tire Material 9" or less and Fire Lane Obstructions (IAC 567.117.6(4)c)

Preprocessed large equipment tires temporarily obstructed required fire lanes between processed material piles.

Liberty's response and corrective actions:

- Off-the-road (OTR) tires and lawn tractor and small equipment tires were processed or removed from site.
- Fire lanes are compliant between piles of processed material.
- Fire lanes are established and free of obstruction.
- Photos documenting clear and compliant fire lanes are included.

5. Fire Lane Widths and Maintenance (IAC 567.117.6(4)c)

25' fire lane maintained between piles of processed material, with the base of the lane kept free from waste tire- debris residuals or other debris.

Liberty's response and corrective actions:

- Pile management and fire lanes are reestablished.
- Liberty will notify the Iowa DNR proactively should future operational circumstances risk fire lane compliance.

6. Stormwater Controls and Silt Fence Repair (117.4(6) & 2017 Variance)

Stormwater controls along the stream on the south and west property boundaries were found to be damaged.

Liberty's response and corrective actions:

- Silt fence sections have been replaced.
- Additional 3-inch gravel/filtration rock installed to improve sediment control.
- Pure Green Erosion Control, a third-party contractor, was hired to install silt fence.
- See included photos.

Liberty will continue routine inspections to ensure stormwater controls remain effective and in compliance.

Closing:

Liberty Tire Recycling remains committed to compliance with IAC Chapter 117 and to maintain a safe and environmentally responsible operation. We appreciate the Iowa DNR's guidance and welcome any follow-up discussions.

During our facility permit renewal review, April 14, 2026, we will discuss permit parameters.

Should you have questions or comments, please contact me via email or phone at rbahr@libertytire.com or 612-804-5371.

Sincerely,



Rahni Bahr
UMW Environmental Manager
Liberty Tire Recycling, LLC Des Moines IA

Cc: Malia Schepers, Iowa DNR
Becky Jolly, Iowa DNR
Mel Pins, Iowa DNR
Mark Maust, UMW Regional VP
Will Sikes, Operation Manager, Des Moines
Jose Ruesga, Safety/Health/HR Manager, Des Moines
Roly Arroyo, Primary Shred & Grade Manager, Des Moines
Alex Wolfe, Maintenance Supervisor, Des Moines
Angela Fornal, LTR Director of Environmental Compliance
Edgar Gonzalez, General Manager, Auburndale, WI / UMW Regional Safety Manager

1. Site Grading / Standing Water (IAC 567.117.6(2)a)





3270 W County Road 42
Burnsville, MN 55337
(952) 892-6060

e re e

INVOICE

255-113062

www.fastsigns.com/255

Payment Terms: Payment Due

Order Due Date: 4/17/2026

Created Date: 4/8/2026

DESCRIPTION: *RUSH* 24" x 18" Aluminum - Qty 100

Bill To: Liberty Tire
12498 Wyoming Ave So.
Savage, MN 55378
US

Pickup At: FASTSIGNS
3270 W County Road 42
Burnsville, MN 55337
US

Ordered By: James Maust
Email: JMaust@libertytire.com
Work Phone: (612) 803-5571

Salesperson: Sam Weber
Entered By: Sam Weber

NO.	Product Summary	QTY	UNIT PRICE	TAXABLE	AMOUNT
1	*NEXT DAY RUSH* 24" x 18" ACM - Qty 60	60	\$51.1117	\$3,066.70	\$3,066.70
1.1	Aluminum Composite (ACM) 3mm White - Part Qty: 1 Width: 24.00" Height: 18.00" Sides: 1 Text: Copy Sign 1: OPEN BURNING ON SITE PROHIBITED Copy Sign 2: HIGHLY FLAMMABLE MATERIALS ON-SITE. BURNING IN AREA NOT RECOMMENDED Color: Cardinal Red Text, White Background Font: A Bold Font Note: Letter height must be visible from 50'.				
2	*3 DAY RUSH* 24" x 18" ACM - Qty 60	60	\$46.5017	\$2,790.10	\$2,790.10

2.1	Aluminum Composite (ACM) 3mm White - Part Qty: 1 Width: 24.00" Height: 18.00" Sides: 1 Text: Copy Sign 1: OPEN BURNING ON SITE PROHIBITED Copy Sign 2: HIGHLY FLAMMABLE MATERIALS ON-SITE. BURNING IN AREA NOT RECOMMENDED Color: Cardinal Red Text, White Background Font: A Bold Font Note: Letter height must be visible from 50'.
3	File Prep / Set Up 1 \$41.24 \$41.24 \$41.24
3.1	FASTSIGNS® Customer Artwork Requirements File Prep / Set Up - Part Qty: 1 Text: *This cost is based on receiving usable vector artwork. If vector artwork is not supplied, additional design charges may apply.

Thank you for your business! We appreciate it.

NOTICE OF INTENT TO LIEN IN CASE OF NON-PAYMENT

This notice is provided to inform you that FASTSIGNS has provided the above-described materials and/or services to property, and that payment for these services and/or materials, is due to FASTSIGNS within 90 days of completion of work as defined above in this invoice.

If payment is not made to FASTSIGNS, a Claim of Lien, commonly referred to as a Mechanics Lien, will be filed against the property.

Subtotal:	\$5,898.04
Taxable Amount:	\$5,898.04
Taxes:	\$479.22
Grand Total:	\$6,377.26
Amount Paid:	\$0.00
DEPOSIT REQUIRED:	\$6,377.26
<i>Credit Card Surcharge:</i>	<i>3.00%</i>
<i>Deposit with Surcharge:</i>	<i>\$6,568.58</i>

Payment in full on invoices under \$2000 is required before any proofing or production begins on this order, unless you have a current credit account with us. Your sales representative can answer any questions about payment.

All credit card payments will incur a 3% surcharge.

The surcharge will not apply if you pay by e-Check, cash, or check.

Thank you! We appreciate your business.

Signature: _____ **Date:** _____

Purchase Order



PO #: 0000388576

PO Date: 04/09/2026

Liberty Tire Recycling

600 River Avenue
Pittsburgh, PA 15212

Vendor: FS BVLL
FSB001
3270 W County Road 42
Burnsville, MN 55337

Bill To: Headquarters
Liberty Tire Recycling
600 River Avenue, 3rd Floor
Pittsburgh, PA 15212
USA

Ship To: Liberty Tire Recycling
1914 E. Euclid Avenue, Bldg A
Des Moines, IA 50313
USA

Phone: 9528923708

Email: invoiceautomation.ltr@wss.pnc.com

Contact: Tracey Norton

Email: tnorton@libertytire.com

Req #	Terms	Ship Method	Department
260409-1118587	15 Days		231

ATTENTION: PO Number Required on invoice.

#	Item Description	GL Account	Qty	UOM	Unit Price	Total
	qty 60 compliance safety signs; "Open Burning On Site Prohibited, Highly Flammable Materials	5805-231-699	1.00	EA	6,377.260	6,377.26

All Prices are in USD

SUB TOTAL:	6,377.26
TAX:	0.00
ORDER TOTAL:	6,377.26

INVOICE #
255-113062a

Liberty Tire
James Maust

FASTSIGNS | Burnsville
Make Your Statement®
952-892-6060 • 255@fastsigns.com

Date: 4-8-26
Proof Version: 1 2 3 4+

24"

24"

18"

**OPEN BURNING
ON SITE
PROHIBITED**

**HIGHLY FLAMMABLE
MATERIALS ON SITE
BURNING IN AREA
NOT RECOMMENDED**

Qty 60

Qty 60

Quantity: 120 total (60 ea)	Color Match: NA	Cut to Shape as indicated
Substrate: ACM 3mm	Laminate: NA	NOTES: RUSH delivery by EOD on 4/10/26
Substrate Color: White	Single Sided	
Print Type: UV	Corners: 1/2" radius	
Vinyl Type: NA	Holes: in corners as shown	

At FASTSIGNS®, we take pride in precision, but the final examination for accuracy is your responsibility. Prior to approval, examine all proofs for accuracy of information, spelling, punctuation, numbers, graphics, colors, and general layout. If we have miscommunicated on your original design, we will provide a second proof free of charge. Additional proofs will be billed at \$10 each. If further revisions are required after approval has been received, additional charges will be incurred.

Salesperson: SW Entered By: SW Designer: HM

3. Processed Tire Pile Size – Shredded Tire Material ≤ 9” (IAC 567.117.6(4)c)

Internal Email Correspondence

Regarding: Holcim Cement

From: Tom Carter <tcarter@libertytire.com>

Sent: Tuesday, April 7, 2026 3:09 PM

To: Tony Bannon <tbannon@libertytire.com>; Mark Maust <MMaust@libertytire.com>

Cc: Robert Sikes <RSikes@libertytire.com>; Will Sikes <wsikes@libertytire.com>; Roly Arroyo <RArroyo@libertytire.com>

Subject: Re: Holcim El Salvador

What I have done in the past is just say, “The chips will represent the sample that was approved by the buyer.”

TC

From: Tony Bannon <tbannon@libertytire.com>

Date: Tuesday, April 7, 2026 at 2:50 PM

To: Mark Maust <MMaust@libertytire.com>

Cc: Tom Carter <tcarter@libertytire.com>, Robert Sikes <RSikes@libertytire.com>, Will Sikes <wsikes@libertytire.com>, Roly Arroyo <RArroyo@libertytire.com>

Subject: Holcim El Salvador

The samples were approved but there are some sticking points in the agreement. Like the specs for example. Can you suggest a modification to the spec sheet that you are comfortable with?

Get [Outlook for Android](#)

Tammara Pexa

From: Mark Maust
Sent: Friday, April 10, 2026 11:52 AM
To: Tammara Pexa; Rahni Bahr
Subject: Fw: Holcim El Salvador project

FYI

Mark T. Maust
Regional Vice President
Liberty Tire Recycling, LLC
12498 Wyoming Ave S
Savage MN 55378

Direct: (952)808-3414
Fax: (952)808-3416
Cell: (612)804-5370
Email: mmaust@libertytire.com

From: Tony Bannon <tbannon@libertytire.com>
Sent: Friday, April 10, 2026 11:40:59 AM
To: Mark Maust <MMAust@libertytire.com>
Cc: Tom Carter <tcarter@libertytire.com>
Subject: Holcim El Salvador project

Mark,

I am sending you this email to update you on all the information that I have regarding the potential agreement with Holcim – El Salvador for the Des Moines material. Last week, we did receive an acknowledgement that Holcim – El Salvador had received the sample of the material we sent them for evaluation. I was recently told that the sample has been approved. However, there are still a few hurdles that we must get through before we get this to the finish line. We are currently negotiating terms in the contract. This should not take too long since we already agreed to a price and the contract is a template of a prior agreement that both parties had already agreed to. That said, I did add a clause that they have to accept responsibility for our costs in moving the material if they back out of the agreement prior to taking title. The final step that must happen before we begin the process of shipping the material out of Des Moines is for the Holcim – El Salvador group to see the sites that will be involved, including Des Moines, Rock Island, and CORE. The earliest that they can put this trip together is between April 30 and May 4th. The volume is anticipated to be between 8,000 and 10,000 tons. We did inform them that we will require a 2 month notice from the time we have a signed agreement before we could have all the material at CORE.

Tony Bannon
Director of Alternative Fuels
(765) 720-7045

4. Processed Tire Material > 9” and Fire Lane Obstructions (IAC 567.117.6(4)c)

AND

5. Fire Lane Widths and Maintenance (IAC 567.117.6(4)c)

Reestablished fire lanes between processed material.







6. Stormwater Controls and Silt Fence Repair (117.4(6) & 2017 Variance)

New Silt Fence Installation
South Property Line facing East



New Silt Fence Installation
South Property Line facing West



New Silt Fence Installation
South Property Line facing West



New Silt Fence Installation
West Property line facing North



New Silt Fence Installation
West property line behind wall facing North



New Silt Fence Installation
West property at top of hill facing South

