IOWA DEPARTMENT OF NATURAL RESOURCES
Administrative Consent Order
ISSUED TO: Holnam, Inc.

IN THE MATTER OF:	ADMINISTRATIVE CONSENT ORDER
HOLNAM, INC.	NO. 1999-AQ-31

TO: HOLNAM, INC.
C/o Scott Hoard, Plant Manager
1840 North Federal Avenue
P.O. Box 1008
Mason City, Iowa 50312

HOLNAM, INC.
C/o CT Corporation System, Registered Agent
2222 Grand Avenue
Des Moines, Iowa 50312

I. SUMMARY

This Administrative Consent Order is entered into between the Iowa Department of Natural Resources (DNR) and Holnam, Inc., (Holnam) for the purpose of addressing alleged monitored violations of the National Ambient Air Quality Standards (NAAQS) for particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM-10) in Mason City, Iowa. This Administrative Consent Order supersedes Administrative Order 97-AQ-19, which is hereby withdrawn.

The parties designate the following representatives for purposes of communications regarding and notices required by this Administrative Consent Order:

FOR Iowa DNR:
Doug Campbell
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Des Moines, Iowa 50322
Ph: 515/281-8930
FAX: 515/242-5094

FOR Holnam, Inc.:
Scott Hoard, Plant Manager
Holnam, Inc.
1840 North Federal Avenue
Mason City, Iowa 50312
Ph: 515/421-3313
FAX: 515/421-3284

Either party may change its designated representative at any time by providing written notice to the other party.

II. NO ADMISSION

While Holnam agrees to comply with the requirements contained herein, it makes no admission as to the Statement of Facts and Conclusions of Law and hereby denies the same.

III. STATEMENT OF FACTS

DNR finds as follows:

1. The 24-hour average PM-10 NAAQS is 150 micrograms per cubic meter (ug/m^3). DNR monitored six exceedences of this standard at a previous DNR monitoring site located at the intersection of 17th and Quincy in Mason City, Iowa. On May 10, May 12, and December 29, 1993, this monitoring site recorded 24-hour average PM-10 concentrations of 174, 172, and 178 ug/m^3, respectively. On February 22, 1994, the same monitoring site recorded a 24-hour average PM-10 concentration of 160 ug/m^3. On December 18, 1995, and March 5, 1996, the same monitoring site recorded 24-hour average PM-10 concentrations of 239 and 286 ug/m^3, respectively.

2. Holnam is a cement manufacturer located at 1840 North Federal Avenue in Mason City, Iowa, which is north of the previous PM-10 monitoring site at 17th and Quincy. Air dispersion modeling of this Holnam facility has been conducted. This modeling predicts that Holnam is a contributor to the PM-10 levels monitored.

3. Holnam is not the sole contributor of PM-10 levels in Mason City and other contributors also are being asked to address this concern as well.

4. DNR and Holnam and other contributors have cooperated in an effort to address the levels of PM-10 in Mason City. For that purpose, DNR and Holnam have agreed to enter into this Administrative Consent Order.

IV. CONCLUSIONS OF LAW

DNR concludes as follows:

1. This Administrative Consent Order is issued pursuant to the provisions of Iowa Code sections 455B.134(9) and 455B.138(1), which authorize the Director to issue any administrative orders necessary to secure compliance with or prevent a violation of Iowa Code chapter 455B, Division II, and the rules promulgated and permits issued pursuant thereto, and to prevent, abate, and control air pollution.

2. The PM-10 emission sources located at Holnam in Mason City, Iowa, include “air contaminant sources” as defined by Iowa Code section 455B.131(2), and

"stationary sources" and "fugitive dust" sources as defined by 567 Iowa Administrative Code (I.A.C.) 20.2.

3. According to 567 I.A.C. 28.1, the ambient air quality standards for the State of Iowa shall be the National Primary and Secondary Ambient Air Quality Standards (NAAQS) located at 40 C.F.R. Part 50, as amended through July 18, 1997.

4. According to the provisions of 40 C.F.R. 50.6(a), the primary and secondary 24-hour ambient air quality standard for PM-10 is 150 ug/m^3, 24-hour average concentration. The standards are attained when the expected number of days per calendar year with a 24-hour average concentration above 150 ug/m^3, as determined in accordance with 40 C.F.R. Part 50, Appendix K, is equal to or less than one. In this case, the observed number of days per calendar year with a 24-hour average concentration above 150 ug/m^3, during the period 1993 through 1995, is greater than one, which constitutes a violation of this standard.

5. An exceedence of the NAAQS for PM-10 constitutes "air pollution" as defined by Iowa Code section 455B.131(3).

6. In accordance with the provisions of Iowa Code section 455B.134(9), the Director shall issue orders consistent with the rules to cause the abatement or control of air pollution.

7. According to the provisions of 567 I.A.C. 22.1(1) and 567 I.A.C. 22.1(3), the owner or operator of a stationary source shall obtain a permit to install or alter equipment or control equipment unless otherwise exempt. Any modifications occurring as a result of this consent order and subject to the provisions of 567 I.A.C. chapter 22 shall require a construction permit or shall meet the requirements of a construction permit exemption contained in the provisions of 567 I.A.C. 22.1(2).

8. The provisions of 567 I.A.C. 23.3(2)"c"(1), provide, in relevant part, that all persons, with certain exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. "Reasonable precautions" are defined in this rule.

V. ORDER

THEREFORE, DNR orders and HOLNAM agrees to the following:

1. A fenceline, of a type designed to preclude public access to the facility property, shall be maintained as depicted in Exhibit "A", which is attached to this Administrative Consent Order and by this reference made a part hereof. "No Trespassing" signs shall be maintained at both ends of the gap in the fence coverage along the western facility boundary, as identified in Exhibit "A". Twenty-four hour

security surveillance shall be maintained of the facility boundaries to further restrict public access. DNR acknowledges that as of the date of this Administrative Consent Order, the facility maintains a fenceline and has installed "No Trespassing" signs meeting the requirements of this paragraph.

2. Within 90 days of the effective date of this Administrative Consent Order, Holnam shall submit to DNR air quality construction permit applications which include the emission rates and hours of operation listed in Exhibit "B." By this reference, Exhibit "B" is made a part hereof. Any required modifications to the sources shall be completed within 60 days of the issuance of the permits (unless specifically stated otherwise in the permit).

3. The emission sources listed in Exhibit "C" shall be limited to the daily and calendar year throughputs listed in Exhibit "C." By this reference, Exhibit "C" is made a part hereof. The total daily throughput, and daily throughput rates for each of the sources listed in Exhibit "C" shall be entered in a daily log to demonstrate compliance with the daily throughput limits. Rolling total daily throughput rates shall be maintained to demonstrate compliance with the total calendar year throughput rates listed in Exhibit "C". The daily logs shall be retained for a period of two years following the date of such entries and shall be made available to the DNR upon request. This record keeping shall be an on-going requirement and shall not terminate. Record keeping shall commence within 30 days of the effective date of this Administrative Consent Order.

4. Storage Piles:

(i). Within 60 days of the effective date of this Administrative Consent Order, Holnam shall locate the storage pile bases as designated in Exhibit "D" and shall limit the size of the storage piles to no greater than the acreages designated in Exhibit "D." Except as otherwise provided in this paragraph 4, the storage piles designated in Exhibit "D" shall be the only storage piles located within the facility. Exhibit "D" shall by this reference become a part hereof. Holnam may relocate a pile specified in Exhibit "D" only after providing written notice to DNR and submitting the results of computer dispersion modeling showing that no exceedances of the PM-10 NAAQS would result. If an exceedance of the PM-10 NAAQS would result based on the computer dispersion modeling results, Holnam shall not move the pile as proposed and the pile shall remain at the location designated on Exhibit "D".

(ii). Notwithstanding the requirements of paragraph 4(i), Holnam may operate temporary piles of materials (not identified on Exhibit "D") that result from maintenance and other similar activities. No such temporary pile shall be maintained for more than one 24-hr period.

(iii). Notwithstanding the requirements of paragraph 4(i) and 4(ii), Holnam may maintain temporary piles of overflow raw materials (excluding fuel) and product, not identified on Exhibit "D", that may result from unforeseen and unplanned operating conditions or problems. Holnam shall take all reasonable measures to limit the size of any such pile and the fugitive emissions that result therefrom. No more than two such

temporary piles may exist at one time. Holnam shall take reasonable measures to remove any such pile as soon as practicable, but in no case shall any such temporary pile be maintained for more than three (3) months. Holnam shall maintain records that include the pile location, planned or actual pile size, pile material content, and the planned removal date, for each pile. The records shall be retained for a period of two years following the date of the above entries and shall be made available to the DNR upon request. This record keeping shall be an on-going requirement and shall not terminate. Record keeping shall commence within 30 days of the effective date of this Administrative Consent Order.

5. Within 30 days of the effective date of this Administrative Consent Order, Holnam shall implement speed controls designed to ensure that the average speed of the haul trucks on the M3 limestone haul road does not exceed 20 miles per hour. The speed controls shall consist of speed limit signs and stop signs along the route.

6. Unpaved Haul Road Trip Restrictions:

(i). The maximum number of round trips per day on the M3 limestone haul road for all of the haul trucks, combined, shall be limited to 77 trips. Each truck shall carry no more than 130 tons of rock per trip.

(ii). The number of round trips per day on the M3 limestone haul road shall be entered in a daily log to demonstrate compliance with this requirement. The daily logs shall be retained for a period of two years following the date of such entries and shall be made available to the DNR upon request. This record keeping shall be an on-going requirement and shall not terminate. Record keeping shall commence within 30 days of the effective date of this Administrative Consent Order.

(iii). Traffic on the M4 haul road shall be limited to scraper travel only. The maximum number of round trips per day and per calendar year on the M4 haul road shall be limited to 200 and 73,000 trips, respectively. The scrapper capacity shall be limited to 20 tons of material per trip. These maximum numbers of round trips and the scrapper capacity shall not be increased unless a dispersion modeling analysis, acceptable to the DNR, is submitted to demonstrate that compliance with the PM-10 NAAQS will be maintained.

7. Control of Fugitive Emissions from Unpaved Haul Roads:

(i). Fugitive emissions from the M3 limestone haul road shall be controlled by applying a chemical dust suppressant. Applications of the selected chemical dust suppressant and the record keeping requirements described below shall begin within 30 days of the effective date of this Administrative Consent Order. A control efficiency of 95 percent shall be maintained on the entire length of both segments of the limestone haul road. This shall be achieved by applying a ground inventory of 0.25 gallons of emulsion (as applied) per square yard. The M3 limestone haul road is approximately 30 feet wide and approximately 3.05 miles long, giving it a total area of approximately 53,680 square yards. Thus, approximately 13,420 gallons of the selected chemical dust suppressant shall be applied initially to achieve this ground level inventory.

Approximately 2,684 gallons of the selected chemical dust suppressant shall be applied no less frequently than once every other week to maintain the ground inventory. This equates to 0.05 gallons of chemical dust suppressant per square yard. Holnam may elect to use any chemical dust suppressant that is capable of achieving the 95 percent control efficiency. In the event that the manufacturer or distributor of a chemical dust suppressant recommends that amounts of chemical dust suppressant other than those specified above be applied, Holnam shall notify DNR of the change in application rates and the manufacturer's/distributor's recommendations.

(ii). Fugitive emissions from the M4 haul road shall be controlled by applying a chemical dust suppressant. Applications of the selected chemical dust suppressant and the record keeping requirements described below shall begin within 30 days of the effective date of this Administrative Consent Order. A control efficiency of 95 percent shall be maintained on the entire length of the M4 haul road. This shall be achieved by applying a ground inventory of 0.25 gallons of emulsion (as applied) per square yard. The M4 haul road is approximately 30 feet wide and approximately 0.32 miles long, giving it a total area of approximately 5,632 square yards. Thus, approximately 1,400 gallons of the selected chemical dust suppressant shall be applied initially to achieve this ground level inventory. Approximately 282 gallons of the selected chemical dust suppressant shall be applied no less frequently than once every other week to maintain the ground inventory. This equates to 0.05 gallons of chemical dust suppressant per square yard. Holnam may elect to use any chemical dust suppressant that is capable of achieving the 95 percent control efficiency. In the event that the manufacturer or distributor of a chemical dust suppressant recommends that amounts of chemical dust suppressant other than those specified above be applied, Holnam shall notify DNR of the change in application rates and the manufacturer's/distributor's recommendations.

(iii). If the selected chemical dust suppressant can not be applied because the ambient air temperature (as measured at the facility during daylight operating hours) will be less than 35^0 F (1.7^0 C) or conditions due to weather, in combination with the application of the chemical dust suppressant**,** could create hazardous driving conditions, then the chemical dust suppressant application shall be postponed and applied as soon after the scheduled application date as the conditions preventing the application have abated. Records of the applications shall be maintained and shall include the dates of each application, the chemical dust suppressant used, the application intensity (gals. / sq.yd.), dilution ratio, the operator's initials, and documentation of road and weather conditions, if necessary. If the selected chemical dust suppressant is not applied as planned, then the records should so indicate and provide an explanation. The records shall be retained for a period of two years following the date of the above entries and shall be made available to the DNR upon request. This record keeping shall be an on-going requirement and shall not terminate.

(iv). In the event Holnam does not use (or plan to use) haul roads M3 and M4 for fourteen (14) days or more, Holnam shall not be required to apply the chemical dust suppressant as provided in paragraph 7(i) and 7(ii), respectively. Prior to using such haul road again, however, an application (at the bi-weekly rate) shall be made subject to the conditions of paragraph 7(iii).

8. The maximum number of round trips per day and per calendar year on the M1, M2, and M5 paved haul roads, for all haul trucks, combined, shall be limited to the values listed below.

Haul Road	Maximum Number of Round Trips per Day	Maximum Number of Round Trips per Year
M1	200	64,240
M2	205	40,880
M5	35	5,110

The number of round trips per day on the M1, M2, and M5 haul roads shall be entered into a daily log to demonstrate compliance with the maximum number of round trips per day limitation. A daily rolling count of the total number of round trips per day on M1, M2, and M5 shall be maintained to demonstrate compliance with the maximum number of round trips per year limitation. The daily logs shall be retained for a period of two years following the date of such entries and shall be made available to the DNR upon request. This record keeping shall be an on-going requirement and shall not terminate. Record keeping shall commence within 30 days of the effective date of this Administrative Consent Order.

9. Control of Fugitive Emissions from Paved Haul Roads:

(i). Fugitive emissions of the paved haul roads M1, M2, and M5 shall be controlled to an effective control efficiency of 80 percent by water flushing followed by sweeping. Water flushing followed by sweeping and the record keeping requirements described below shall begin within 30 days of the effective date of this Administrative Consent Order. The control efficiency of 80 percent shall be achieved by water flushing followed by sweeping haul roads M1, M2, and M5 once per day. The following table contains the approximate size of each haul road in square yards and the approximate amount of water to be applied to each road in each application. The water quantities are based on a spray rate of approximately 0.23 gallons per square yard.

Paved Haul Road	Road Area (sq. yards)	Approximate Water Application Rate (gals. of water)
M1	6,688	1,538
M2	4,928	1,133
M5	2,054	472

(ii). If water flushing followed by sweeping can not be accomplished because the ambient air temperature (as measured at the facility during daylight operating hours) will be less than 35^0 F (1.7^0 C) or conditions due to weather, in combination with the application of the water, could create hazardous driving conditions, then the water flushing and sweeping shall be postponed and accomplished as soon after the scheduled

date as the conditions preventing the application have abated. Additionally, water flushing and sweeping need not occur when a rain gage located at the site indicates that at least 0.2 inches of precipitation (water equivalent) has occurred within the preceding 24-hr time period or the paved road(s) will not be used on a given day.

(iii). Records of the applications shall be maintained and shall include the dates of each application, the amount of water applied, the areas treated, and the operator's initials. If water is not applied when scheduled due to the conditions specified in Paragraph **9**(ii) above, the conditions which prevented such application, or made such application unnecessary, shall be documented. The records shall be retained for a period of two years following the date of the above entries and shall be made available to the DNR upon request. This record keeping shall be an on-going requirement and shall not terminate.

10. Holnam shall maintain records of the number coal cars unloaded daily at the Coal Dump Shed. These records shall include the unloading dates and the load capacity (tons) of each coal car unloaded. The records shall be retained for a period of two years following the date of the above entries and shall be made available to the DNR upon request. This record keeping shall be an on-going requirement and shall not terminate.

11. Holnam shall submit to the Mason City DNR Field Office #2 written quarterly reports detailing progress toward the completion of the requirements of Section V.2 of this Administrative Consent Order. The quarterly reports shall be due no later than 30 days following the close of each quarter. The first report shall be due 30 days following the end of the quarter in which the Administrative Consent Order is effective. Quarterly reporting may be terminated following submittal of a final report and written request to the DNR, and a written response from the DNR stating that all such described requirements of this Administrative Consent Order have been satisfactorily completed. **Record keeping required by this Administrative Consent Order shall be an on-going requirement and shall not terminate**.

VI. WAIVER OF APPEAL RIGHTS

This Administrative Consent Order is entered into knowingly and with the consent of Holnam. For that reason, Holnam waives its right to appeal this Administrative Consent Order or any part thereof.

VII. NONCOMPLIANCE

Failure to comply with this Administrative Consent Order may result in the imposition of administrative penalties or referral to the Attorney General's office to obtain injunctive relief and civil penalties pursuant to the provisions of Iowa Code section 455B.146.

VIII. TERMINATION OF THIS ADMINISTRATIVE CONSENT ORDER

This Administrative Consent Order shall terminate upon a showing by Holnam, acceptable to DNR and responded to in writing by the DNR, that it has complied with the obligations contained herein or as may otherwise be agreed upon by the parties.

Procedural questions regarding this order should be directed to:

Anne Preziosi
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322
515-281-6243

/s/ Larry Wilson
PAUL W. JOHNSON, DIRECTOR
IOWA DEPARTMENT OF NATURAL RESOURCES

Dated this 2 day of September, 1999.

/s/ Scott R. Hoard
for HOLNAM, INC.

Dated this 17 day of August,1999.

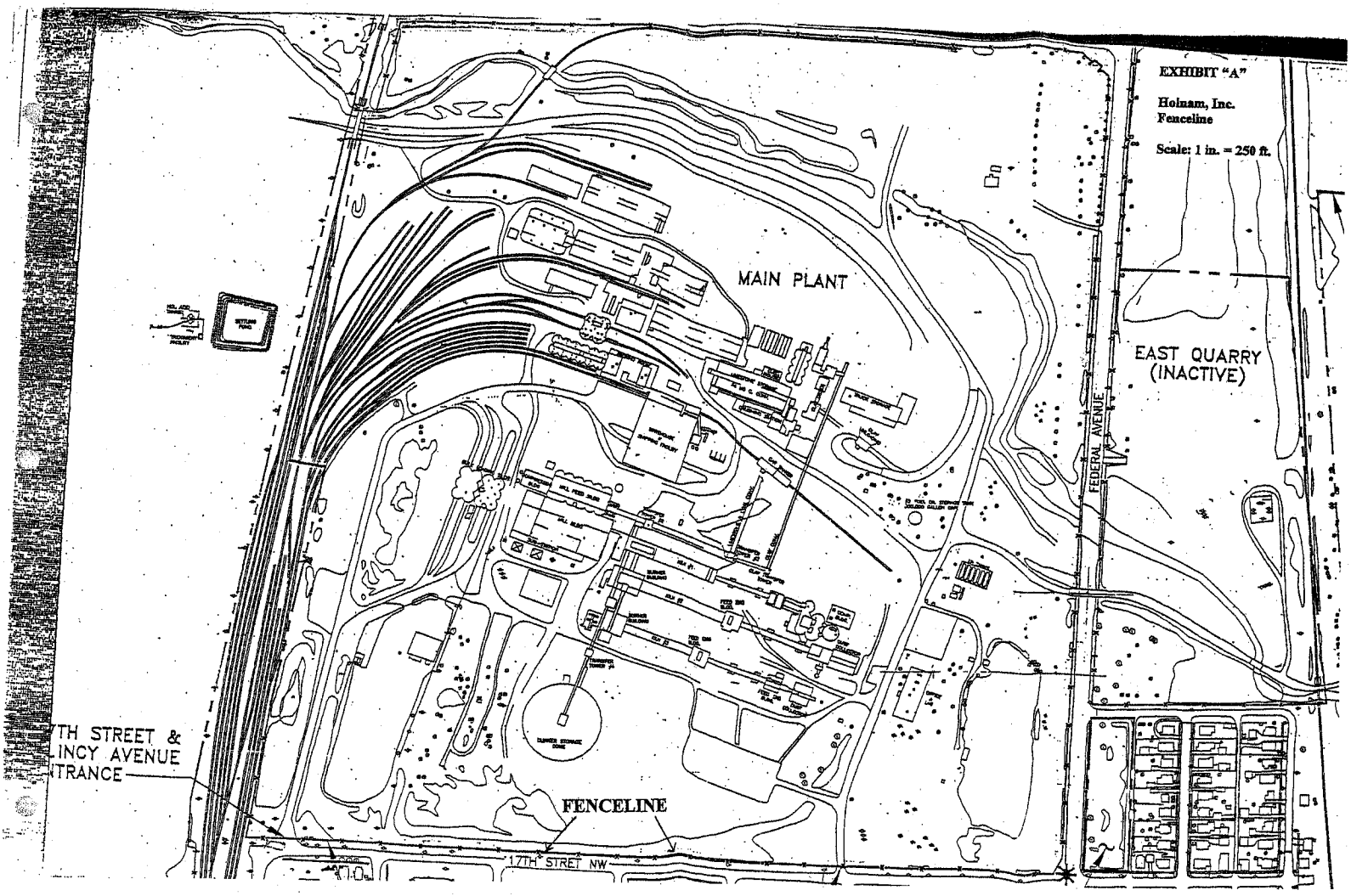
EXHIBIT "A"
Holnam, Inc.
Fenceline
Scale: 1 in. = 250 ft.
MAIN PLANT
EAST QUARRY
(INACTIVE)
FEDERAL AVENUE
TH STREET &
INCY AVENUE
TRANCE
FENCELINE
17TH STRET NW

EXHIBIT "B", Page 1 of 2
Point Source PM-10 Emission Rates, Holnam, Inc.

Source ID	Source Location	Source Description	Emission Rate (lb/hr)*
P1	Clay Dry Building	Clay Kiln	7.286
P3	Clay Transfer Tower	Belt to Belt Drop	0.218
P4	Transfer Tower 3	Belt to Belt Drop (clinker)	0.291
P5	Transfer Tower 3	Belt to Belt Drop	0.291
P6	Transfer Tower 3	Belt to Belt Drop (limestone)	0.291
P7	Mill Silo 1, 4, 7, 10/Top of Mill Silos	Belt to Belt Drop, Belt to Silo Drop	0.583
P8	Mill Silo 16, 17, 18/ Top of Mill Silos/ Mill Bin K	Belt to Belt Drop, Belt to Silo Drop, Belt to Mill Bin Drop	0.010
P9	Mill Silo 11, 12/ Top of Mill Silos, Mill Bin F, G, H	Belt to Belt Drop, Belt to Silo Drop, Belt to Mill Bin Drop	0.583
P10	Mill Silo 13, 14, 15	Belt to Silo Drop	1.079
P11	Mill Building	RM #2 and Separator	0.006
P13	Mill Building	RM #2 and Separator	2.548
P14	Mill Building	RM #2 and Separator	2.548
P15	Mill Building	RM #3 and Separator	2.183
P16	Mill Building	RM #3 West Separator	2.183
P17	Mill Building	RM #3	1.095
P18	Homogen Silo 3	Airslide to Silo Drop	1.095
P19	Homogen Silo 1,2/ Feed Silo 1,2/ Dust Silo	Airslide/bucket Elevator to Silo Drop	0.873
P20	Kiln 2 Feed Path	Feed Silo 2 to Belt Drop	0.437
P21	Kiln 2 Feed Building	Belt to Bucket Elevator Drop	0.437
P22	Kiln 2 Feed Building	Kiln 2	107.94
P23	Kiln 2 Feed Building	Lvl Box, W Feeder, Kiln 3 Feed Pump	0.218
P25	Kiln 3 Feed Building	Kiln 3	60.0
P26	Kiln 2 Burner Building	Clinker Cooler 2, Spill Drag to Belt Drop	7.508
P27	Kiln 3 Burner Building	Clinker Cooler 3	9.444
P28	Transfer Tower 1	Belt to Belt Drop, Belt to Bucket Elevator Drop, Bucket Elevator to Belt Drop	0.011
P29	Transfer Tower 4	Belt to Belt Drop, Belt to Bucket elevator Drop, Bucket Elevator to Belt Drop	0.0049
P30	Lime Storage Bin	Airslide to Silo Drop	0.187
P31	Mill Building	FM #1 and Separator	1.056
P32	Mill Building	FM #1 and Separator	1.056
P33	Mill Building	FM #2 and Separator	3.413
P34	Mill Building	FM #3 and Separator	3.413
P35	Mill Building	FM #4 Feed Belt Drop Bucket Elevator	0.547
P36	Mill Building	FM #4 Separator	2.183
P37	Mill Building	FM #4 Separator	2.183
P38	Mill Building	FM #4	1.460
P39	Packhouse Silos 25-35	Airslide to Silo Drop	0.149
P40	Packhouse	SE Packer #1	0.00671
P41	Packhouse	NE Packer #2	0.00671
P42	Packhouse	SW Packer #3	0.00671
P43	Packhouse	NW Packer #4	0.00671
P44	North Rail Silos 1-4	Airslide to Rail Silos Drop	0.149
P45	East Truck Silos 37-42	Airslide to Silo Drop	0.332
P46	West Truck Silos 59-64	Airslide to Silo Drop	0.332
P47	Transfer Tower 2	Belt to Belt Drop (clinker)	0.002
P48	East Truck Silos FK Pump	Pneumatic Cement Transfer	0.160
P49	West Truck Silos FK Pump	Pneumatic Cement Transfer	0.160
P55	Clinker Storage Dome Pent.	Belt to Feed Ladder Drop	0.190
P56	Crushing Station	Secondary Crushing Impactor	1.024
P57	Limestone Crushing Building	Belt to Belt Drop	2.333
P58	Outside	Belt to Bucket Elev. Drop, Bucket Elev. to Feed Belt Drop	0.437
P59	Kiln 3 Feed Building	Kiln 3 Alleviator, Waste Dump Equipment and Feeder	0.527
P60	Kiln 3 Burner Building	Cooler Drag Conveyor to Belt Drop	0.00045
***Hourly limits are based on the average results of three valid test runs using EPA Reference Methods**			

IOWA DEPARTMENT OF NATURAL RESOURCES
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EXHIBIT "B"

Point Source Calendar Year Limitations
Holnam, Inc.

Source ID	Source Description	Maximum Calendar Year Hours of Operation (hours/year)
P1	Clay Kiln	3504
P13	Raw Mill 2 and Separator	7008
P17	Raw Mill 3	7446
P30	Lime Bin air slide to bin drop	4380
P31	Finish Mill 1 and Separator	8322
P33	Finish Mill 2 and Separator	7884
P34	Finish Mill 3 and Separator	7534
P38	Finish Mill 4	7534
P39	Packing silos air slide to silo drop	7534
P40 through P43	Packhouses 1, 2, 3, 4	5256 (combined max)
P44	N Rail Silos 1-4 drop	7446
P45	E Truck Silos 37-42 drop	7008
P46	W Truck Silos 59-64 drop	7008
P48 and P49	Truck silos pneumatic transfers	1752 (combined max)
P56	Secondary Crushing Impactor	2628

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EXHIBIT "C"

Maximum Throughput Rates for Non Point Sources
Holnam, Inc.

Point ID	Source Description	Maximum Daily Throughput- (tons/day)	Total Calendar Year Throughput- (tons/year)
F-28	Cement Silos 13-24 Air slide to silo drop	2,400	753,360
F-29	N. Rail Load Dock pour spout to rail drop	4,800	175,200
F-30	S. Rail Load Dock pour spot to rail drop	4,800	175,200
F-31	E. Truck Load Dock pour spout to truck drop	6,000	328,500
F-32	E. Truck Load Dock pour spout to truck drop	6,000	328,500
F-33	W. Truck Load Dock pour spout to truck drp	6,000	328,500
F-34	W. Truck Load Dock pour spout to truck drp	6,000	328,500
F-47	Flat Storage Bld cement transfer in/out	1,680	122,640

IOWA DEPARTMENT OF NATURAL RESOURCES
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EXHIBIT "D"

Holnam, Inc. Storage Pile Data

Storage Pile ID/(Material)	Maximum Pile Size (acres)
F-8 (clay)	1.3
F-9 (sand)	0.2
F-12 (gypsum)	0.2
F-17 (fluid coke)	0.4
F-18 (coal)	1.0
F-19 (pet coke)	0.6
F-51 (gypsum)	0.1
F-52 (slag)	0.4
F-53 (iron)	0.1

Exhibit "D", Page 2 of 2. Storage Pile Sizes and Locations
Holnam, Inc., Mason City, Iowa