IOWA DEPARTMENT OF NATURAL RESOURCES
Administrative Consent Order
ISSUED TO: Lehigh Portland Cement Company

IN THE MATTER OF: LEHIGH PORTLAND CEMENT COMPANY	ADMINISTRATIVE CONSENT ORDER NO. 1999-AQ-32

TO: LEHIGH PORTLAND CEMENT COMPANY
Verne Stuessy
Acting Plant Manager
700 25th Street N.W.
Mason City, Iowa 50401

LEHIGH PORTLAND CEMENT COMPANY
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 Lehigh Portland Cement Company (Lehigh) 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 This Administrative Consent Order supersedes Administrative Order 97-AQ-18, which is hereby withdrawn.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 Lehigh Portland Cement Company:

Verne Stuessy, Acting Plant Manager
Lehigh Portland Cement Company
700 – 25th Street N.W.
Mason City, Iowa 50401
Ph: 515/421-3400
FAX: 515/421-3404

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

II. NO ADMISSION

While Lehigh 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 exceedances of this standard at a 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. Lehigh is a cement manufacturer located at 700 25th Street N.W. in Mason City, Iowa, which is northwest of the 17th and Quincy PM-10 monitoring site. Air dispersion modeling of this Lehigh facility has been conducted. This modeling has established that Lehigh is a contributor to the PM-10 levels monitored.

3. Lehigh 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 Lehigh and other contributors have cooperated in an effort to address the levels of PM-10 in Mason City. For that purpose, DNR and Lehigh 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 Lehigh 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 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 exceedance 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. According to the provisions of 567 I.A.C. 23.3(2)"c"(1), no person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved public roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance, as defined in Iowa Code section 657.1, from becoming airborne. All persons, with the above 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 LEHIGH AGREES to the following:

1. Within 120 days of the effective date of this Administrative Consent Order, a continuous fenceline with controlled access gates or a physical barrier, specifically a vertical wall and/or embankment under a railroad trestle, shall be erected to enclose the plant area as depicted in Exhibit "A", which is attached to this Administrative Consent Order and by this reference made a part hereof. The fenceline shall be of a type designed to preclude public access to the facility property. As proposed by Lehigh, the portion of 25th Street that lies within the Lehigh facility property lines shall be vacated and included within the confines of the continuous fenceline and physical barrier, such that the general public is not allowed access.

2. Within 90 days of entering into this Administrative Consent Order, Lehigh shall submit to DNR air quality construction permit applications which include the emission rates, hours of operation, throughput rates, stack parameters, and stack configurations 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 this order).

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 and annual throughput limits. For sources 7A, 56A, 57A, 73A, 74A, and 75A, if the sources operate within the maximum hourly throughput time period indicated in Exhibit "C", then the source daily log shall be used to demonstrate compliance. If these sources operate at other times during any day, then compliance will be demonstrated for that calendar day by entering the hourly throughput and total daily throughput rates for each of these sources in daily logs to demonstrate compliance with the daily and annual throughput limits. 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. Record keeping shall commence within 30 days of the effective date of this Administrative Consent Order.

4. The coal crusher (source ID 40) shall be operated only in an enclosed structure with all access doors and any other openings closed during normal operations, except for doors during ingress and egress.

5. Storage Piles:

(i). Within 60 days of the effective date of this Administrative Consent Order, Lehigh 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 5, 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. Lehigh 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, Lehigh shall not move the pile as proposed and the pile shall remain at the location designated in Exhibit "D".

(ii). Notwithstanding the requirements of paragraph 5(i), Lehigh 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 72-hr period.

(iii). Notwithstanding the requirements of paragraph 5(i) and 5(ii), Lehigh may maintain temporary piles of overflow raw materials and product (not identified on Exhibit "D") that may result from unforeseen and unplanned operating conditions or problems. Lehigh 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. No such temporary pile shall be maintained for more than one (1) month. Lehigh 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.

6. Within 30 days of the effective date of this Administrative Consent Order, Lehigh shall implement speed controls designed to ensure that the average speed of the haul trucks on the limestone and clay haul roads (source IDs 56 and 57) does not exceed 18.5 miles per hour. The speed controls shall consist of a combination of speed limit signs, stop signs, and governors on the accelerators of each haul road truck, or other methods approved in writing by DNR.

7. The maximum number of round trips per day and per calendar year on the limestone haul road (source ID 56) for all of the haul trucks, combined, shall be limited to 70 and 17,640 trips, respectively. The number of round trips per day on the limestone haul road shall be entered in a daily log to demonstrate compliance with this requirement. 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. Record keeping shall commence within 30 days of the effective date of this Administrative Consent Order.

8. Fugitive emissions from the limestone haul road (source ID 56) 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 90 percent shall be maintained on the first 1.41 miles of the limestone haul road from the quarry. This will require a ground inventory of 0.25 gallons of chemical dust suppressant per square yard. This section of the limestone haul road is 30 feet wide and 1.41 miles long, giving it a total area of 24,816 square yards. At least 6,204 gallons of the selected chemical dust suppressant shall be applied initially to achieve this ground level inventory. At least 1,241 gallons of the selected chemical dust suppressant shall be applied every calendar month with no more than 35 days between applications, to maintain the ground inventory. This equates to 0.05 gallons of chemical dust suppressant per square yard. In the event that the manufacturer or distributor of a chemical dust suppressant recommends that amounts other than those specified above be applied, Lehigh shall notify DNR in writing of the change in application rates and the manufacturer's/distributor's recommendations.

A control efficiency of 95 percent shall be maintained on the remaining length of the limestone haul road from 1.41 miles from the quarry to the primary limestone crusher (source ID 2). This will require a ground inventory of 0.25 gallons of chemical dust suppressant per square yard. The remaining limestone haul road is 30 feet wide and 2.89 miles long, giving it a total area of 50,864 square yards. At least 12,716 gallons of the selected chemical dust suppressant shall be applied initially to achieve this ground level inventory. At least 2,543 gallons of the selected chemical dust suppressant shall be applied not less than at least once every other week to maintain the ground inventory. This equates to 0.05 gallons of chemical dust suppressant per square yard.

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 used, the application intensity (gals. / sq.yd.), dilution ratio, the areas treated, 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.

9. The maximum number of round trips per day and per calendar year on the clay haul road (source ID 57) for all of the haul trucks, combined, shall be limited to 130 and 1,667 trips, respectively. The number of round trips per day on the clay haul road shall be entered in a daily log to demonstrate compliance with this requirement. 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. Record keeping shall commence within 30 days of the effective date of this Administrative Consent Order.

10. Fugitive emissions from the clay haul road (source ID 57) shall be controlled to an effective control efficiency of 95 percent 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 will require a ground inventory of 0.25 gallons of the selected chemical dust suppressant per square yard. The clay haul road is 30 feet wide and 0.9 miles long, giving it a total area of 15,840 square yards. At least 3,960 gallons of the selected chemical dust suppressant shall be applied initially to achieve this ground level inventory. At least 792 gallons of the selected chemical dust suppressant shall be applied not less than once every other week to maintain the ground inventory. This equates to 0.05 gallons of the selected emulsion per square yard. In the event that the manufacturer or distributor of a chemical dust suppressant recommends that amounts other than those specified above be applied, Lehigh shall notify DNR in writing of the change in application rates and the manufacturer's/distributor's recommendations.

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 used, the application intensity (gals. / sq.yd.), dilution ratio, the areas treated, 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.

It is not uncommon for this clay haul road to go unused for periods greater than one-half month. In the event Lehigh does not use the clay haul road for a period greater than one-half month, Lehigh shall not be required to apply the chemical dust suppressant as provided in the above paragraph, on the condition that such event is noted and explained in the records required herein and that, prior to use, an application will be made, weather permitting and requiring.

11. The maximum number of round trips per day and per calendar year on the paved haul road from the product loadout silos to US Highway 65 (source IDs 801-812) for all haul trucks, combined, shall be limited to the values listed below.

Month	**Maximum Number of Trips per Day**
January	80
February	69
March	200
April	250
May	250
June	250
July	203
August	250
September	250
October	250
November	250
December	250
Calendar Year	**Maximum Number of Trips per Year**
January through December	37,302

The number of round trips per day on this haul road shall be entered into a monthly log to demonstrate compliance with this requirement. Monthly 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. Record keeping shall commence within 30 days of the effective date of this Administrative Consent Order.

12. Fugitive emissions of the paved haul road from the product loadout silos to US Highway 65 (source IDs 801-812) shall be controlled to an effective control efficiency of 80 percent by water flushing followed by sweeping. Water flushing followed by sweeping applications and the record keeping requirements described below shall begin within 30 days of the effective date of this Administrative Consent Order. Using an application rate of 0.48 gallons per square yard, this haul road shall require a water flushing followed by sweeping application after every 362 vehicle passes to maintain an 80 percent control efficiency. Based on a worse-case round trip estimate of 222 trips per day, the water flushing followed by sweeping will have to be accomplished every two days. The haul road is 24 feet wide and 2072 feet long, giving it a total area of 5,525 square yards. Based on an application rate of 0.48 gallons of water per square yard, 2,652 gallons of water will be required for each application.

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 gauge located at the site indicates that at least 0.2 inches of precipitation (water equivalent) has occurred within the preceding 24-hr time period. Records of the applications shall be maintained and shall include the dates and times of each application, the calculated application intensity, the areas treated, the operator's initials, and documentation road and weather conditions, if necessary. If the water flushing is not accomplished because ambient air temperatures are less than 35^0 F during the entire day, or precipitation exceeding 0.2 inches has occurred in the proceeding 24 hours, then the records should indicate this. 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.

13. Lehigh shall submit to the DNR Field Office #2 written quarterly reports detailing progress toward the completion of the requirements of Sections V.1., V.2., V.5., and V.6. 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 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 Lehigh. For that reason, Lehigh 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. By agreeing to this Administrative Order, Lehigh is not agreeing to such action or penalties.

VIII. TERMINATION OF THIS ADMINISTRATIVE CONSENT ORDER

This Administrative Consent Order shall terminate upon a showing by Lehigh, 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.

IX. EFFECTIVE DATE

The effective date of this Administrative Consent Order is defined as the date on which the Director of the DNR signs this Administrative Consent Order. Lehigh will be notified of this date following the signature of this Administrative Consent Order by the Director, and will be provided with a signed copy.

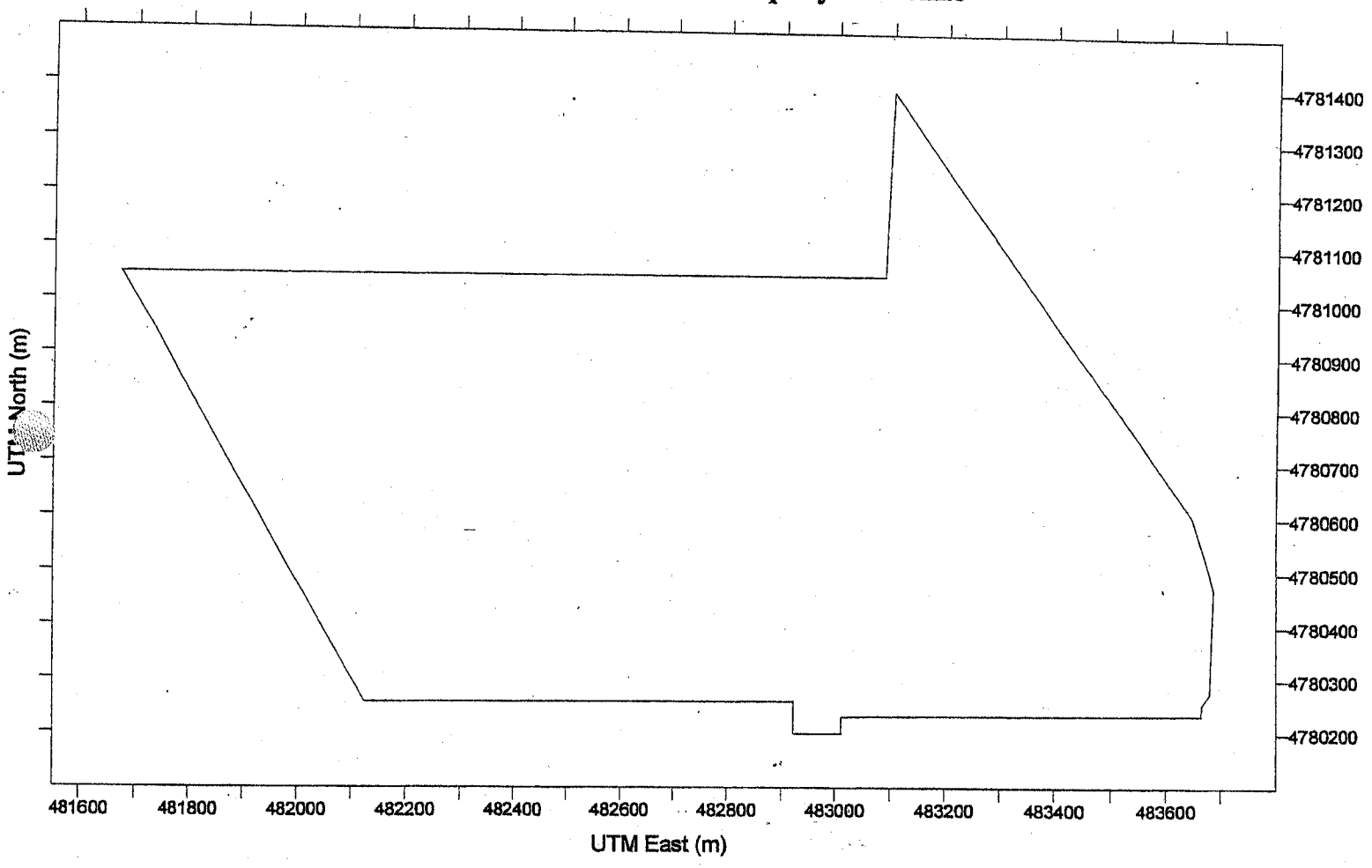
/s/ Larry Wilson
PAUL W. JOHNSON, DIRECTOR
IOWA DEPARTMENT OF NATURAL RESOURCES

Dated this 2 day of September, 1999.

/s/ Verne Stuessy
for LEHIGH PORTLAND CEMENT COMPANY

Dated this 23 day of August, 1999.

Exhibit "A"
Lehigh Portland Cement Company Fenceline



IOWA DEPARTMENT OF NATURAL RESOURCES
Administrative Consent Order
ISSUED TO: Lehigh Portland Cement Company
EXHIBIT "B"
Point Source Emission Rates and Stack Parameters
Lehigh Portland Cement Company

Source ID	Source Description	Emission Rate (g/s)	Stack Height (m)	Exit Temp (K)	Exit Velocity (m/s)	Stack Diameter (m)	Rain Cap or Angled Vent?
2	Limestone Primary Crushing	0.30240	18.29	293.0	0.00	1.11	Yes
3	Primary Screening System	0.12960	16.76	293.0	0.00	0.77	Yes
5	Limestone Secondary Crushing	0.10260	16.76	293.0	0.00	0.46	Yes
6	Limestone Transfer Points	0.06480	16.76	293.0	0.00	0.49	Yes
8	Limestone Transfer Points	0.04536	12.19	293.0	0.00	0.31	Yes
9	Limestone Transfer Points	0.06787	24.38	293.0	0.00	0.43	Yes
10	Limestone Transfer Points	0.06804	24.38	293.0	0.00	0.41	Yes
11	Limestone Transfer Points	0.10891	24.38	293.0	0.00	0.72	Yes
12	Limestone Transfer Points	0.04536	24.38	293.0	0.00	0.41	Yes
13	Limestone Transfer Points	0.04536	12.19	293.0	0.00	0.34	Yes
15	Clay Crushing System	0.09991	14.30	293.0	0.00	0.76	Yes
18	Clay Transfer Point	0.17775	33.53	366.5	0.00	0.61	Yes
19	Raw Mix Transfer Point	0.17280	57.91	322.1	0.00	0.60	Yes
20	Raw Mix Transfer Point	0.03657	33.53	366.5	0.00	0.62	Yes
21	Raw Mix Transfer Point	0.03657	30.48	366.5	0.00	0.41	Yes
22	Raw Mix Transfer Point	0.11588	33.53	366.5	0.00	0.41	Yes
23	Raw Mix Transfer Point	0.11115	33.53	366.5	0.00	0.41	Yes
24	Raw Mix Transfer Vent	0.16846	57.91	366.5	0.00	0.61	Yes
26	Clinker Cooler	2.85	25.91	442.6	13.99	2.44	No
27	Kiln Bypass Stack	3.74	48.77	505.4	12.62	2.13	No
28	Kiln Dust Disposal Tank	0.12604	21.94	293.0	16.09	0.46	No
33	Clinker Outhaul Transfer	0.06480	30.48	293.0	0.00	0.20	Yes
34	Clinker Bin to Truck Loadout	0.02160	30.48	293.0	0.00	0.34	Yes
35	Clinker Outhaul Transfer	0.17280	54.86	293.0	0.00	0.60	Yes
36	Clinker Withdrawal Transfer	0.08640	9.14	293.0	0.00	0.42	Yes
37	Clinker Transfer Point	0.02160	9.14	293.0	0.00	0.17	Yes
38	Clinker Transfer	0.02251	16.76	293.0	0.00	0.20	Yes
39	Clinker Transfer Elevator	0.13608	24.38	293.0	29.34	1.00	No
41	No. 3 Finishing Mill West Vt.	0.14580	24.38	293.0	0.00	0.46	Yes
42	No. 3 Finishing Mill West Vt.	0.14580	24.38	293.0	0.00	0.46	Yes
43	No. 5 Finishing Mill	0.18360	24.38	366.5	0.00	0.52	Yes
44	No. 6 Finishing Mill	0.18360	24.38	366.5	0.00	0.46	Yes
45	No. 4 Finishing Mill	0.64800	28.95	366.5	24.38	1.22	No
46	No. 4 Finishing Mill Conveyor	0.09720	25.91	310.9	0.00	0.71	Yes
47	Storage Silo Vent System	0.16200	45.72	293.0	0.00	0.66	Yes
48	Finished Cement Transfer Elv	0.06480	45.72	293.0	0.00	0.31	Yes
50	Cement Bulk Loadout	0.02160	45.72	293.0	0.00	0.20	Yes
51	Finished Cement Loadout	0.02160	45.72	293.0	0.00	0.20	Yes
52	Rail/Truck Loading System	0.13608	45.72	293.0	0.00	0.53	Yes
53	Finished Cement Loadout Spout	0.13608	45.72	293.0	0.00	0.20	Yes
62	Front Coal Mill D.C.	0.02808	15.24	338.7	17.92	0.66	No

IOWA DEPARTMENT OF NATURAL RESOURCES
Administrative Consent Order
ISSUED TO: Lehigh Portland Cement Company

EXHIBIT "B"
Point Source Calendar Year Limitations
Lehigh Portland Cement Company

Source ID	Source Description	Maximum Calendar Year Hours of Operation (hours/year)
2	Limestone Primary Crushing	4380
3	Primary Screening System	4380
5	Limestone Secondary Crushing	4380
6	Limestone Transfer Points	4380
8	Limestone Transfer Points	7884
9	Limestone Transfer Points	7884
10	Limestone Transfer Points	7884
11	Limestone Transfer Points	7884
12	Limestone Transfer Points	876
13	Limestone Transfer Points	876
15	Clay Crushing System	876
18	Clay Transfer Point	7884
19	Raw Mix Transfer Point	7884
20	Raw Mix Transfer Point	7884
21	Raw Mix Transfer Point	7884
22	Raw Mix Transfer Point	7884
23	Raw Mix Transfer Point	7884
41	No. 3 Finishing Mill West Vt.	7534
42	No. 3 Finishing Mill West Vt.	7534
43	No. 5 Finishing Mill	7534
44	No. 6 Finishing Mill	7534
45	No. 4 Finishing Mill	7534
46	No. 4 Finishing Mill Conveyor	7534

Source ID	Source Description	Maximum Calendar Year Throughput (tons/year)
26	Clinker Cooler	1,850,000
27	Kiln Bypass Stack	1,850,000

IOWA DEPARTMENT OF NATURAL RESOURCES
Administrative Consent Order
ISSUED TO: Lehigh Portland Cement Company
EXHIBIT "C"
Maximum Throughput Rates for Uncontrolled Sources
Lehigh Portland Cement Company

Source ID	Source Description	Number of Transfers	Maximum Daily Throughput-Each Transfer (tons/day)	Maximum Calendar Year Throughput-Each Transfer (tons/year)
1	Railcar Unloading	3	7,200	200,000
7A	Limestone Transfer <> Storage Pile	1	19,200[a]	2,500,000
14A	Raw Material Transfer/Clay Storage Pile	2	12,000	200,000
14B	Raw Material Transfer/Clay Storage Pile	1	12,000	200,000
15A, 15B	Clay Crushing Fugitives	4	12,000	200,000
39-2 (239)	Gypsum/Anhydrite Bucket Transfer	2	3,600	100,000
39-3 (339)	Clinker Bucket Transfer	2	3,600	500,000
40	Coal Crusher	1	1,320	200,000
49	Rail Leg Loadout	1	300	5,000
56A	Limestone Transfer <> quarry to truck	2	16,000[b]	1,675,800
57A	Clay Transfer <> quarry to truck	2	12,000[c]	141,667
58A	Coal Transfer	1	7,200	200,000
59A	Sand Transfer <> delivery	2	12,000	2,190,000
59B	Sand Transfer <> to process	1	12,000	2,190,000
60A	Clay Transfer <> delivery	2	12,000	2,190,000
60B	Clay Transfer <> process	1	12,000	2,190,000
61A	Clay Transfer <> delivery	2	12,000	2,190,000
61B	Clay Transfer <> process	1	12,000	2,190,000
62-1 (162)	Coal Transfer System	4	1,320	481,800
63A	Kiln Dust Transfer	1	300	70,080
73A	Limestone Transfer <>process pile at crusher	1	19,200[a]	500,000
74A	Limestone Transfer <> at clay crusher	1	2,000[d]	70,000
75A	Clinker Transfer <> Craneway	1	1,200[e]	15,000
76A	Clinker, Gypsum, Slag Transfer <> east of finish mill building	1	3,600	50,000

[a]Maximum hourly throughput will be 1,200 ton/hour for the period 7:00 a.m. through 11:00 p.m. and 750 ton/hour at other times. Maximum daily throughput will not be exceeded on any one day.
[b]Maximum hourly throughput will be 1,000 ton/hour for the period 7:00 a.m. through 11:00 p.m. and 666 ton/hour at other times. Maximum daily throughput will not be exceeded on any one day.
[c]Maximum hourly throughput will be 1,000 ton/hour for the period 8:00 a.m. through 8:00 p.m. and 460 ton/hour at other times. Maximum daily throughput will not be exceeded on any one day.
[d] Maximum hourly throughput will be 250 ton/hour for the period 8:00 a.m. through 4:00 p.m. and 83.3 ton/hour at other times. Maximum daily throughput will not be exceeded on any one day.
[e] Maximum hourly throughput will be 100 ton/hour for the period 7:00 a.m. through 7:00 p.m. and 50 ton/hour at other times. Maximum daily throughput will not be exceeded on any one day.

IOWA DEPARTMENT OF NATURAL RESOURCES
Administrative Consent Order
ISSUED TO: Lehigh Portland Cement Company

EXHIBIT "D"

Lehigh Storage Pile Data

Storage Pile ID/(Material)	Maximum Pile Size (acres)
14 (clay 1)	1
58 (coal)	3
59 (sand)	4
60 (clay 2)	3
61 (clay 3)	3
63 (kiln dust)	2
73 (quarry run limestone)	1
74 (quarry run limestone)	0.5
75 (clinker)	0.5
76 (clinker, gypsum, granulated blast furnace slag)	0.75

Exhibit "D", Page 2 of 2. Storage Pile Sizes and Locations (apprx)
Lehigh Portland Cement Company, Mason City, IA