



Air Quality Construction Permit

Permit Number: 73-A-219-S9

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corp

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

(563) 324-1931 x 1140
dosland@linwoominig.com

401 E Front St
Davenport, IA 52804

Permitted Equipment

Emission Point ID: EP LP-4

Table 1 – Emission Units and Control Equipment

EU ID	Description	Maximum Rated Capacity	Initial Control Equipment	Final Control Equipment
EU K-3	Rotary Lime Kiln 3 (150 MMBtu/hour)	8.75 tons/hour	Cyclone #3 (CE C3)	Limestone Mining Tunnel (CE TL1)

Equipment Location: 401 East Front Street
Davenport, Iowa 52804

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Table 2 – Project Issuance Information

Project Number	Project Description	Stack Testing	Issuance Date
23-125	Update Equipment List; Modify Emission Limits; and Amend Exhaust Flowrate and Monitoring Requirements	Yes	10/11/2024

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

Table 3 – Emission Limits

Pollutant	lb/hr ¹	Other Limits	Reference/Basis
Particulate Matter (PM) – State	NA	0.1 gr/scf ¹	567 IAC 23.4(8)
	13.83 ²	NA	Requested
PM ₁₀	13.83 ^{3,4}	NA	NAAQS
Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
Sulfur Dioxide (SO ₂)	NA	0.6 lb/MMBtu ^{1,7}	567 IAC 23.3(3)“a”(3)
	NA	500 ppm _v ^{1,8}	567 IAC 23.3(3)“e”
	2.0 ²	NA	Requested
Nitrogen Oxides (NO _x)	12.70 ²	NA	Requested
Volatile Organic Compounds (VOC)	1.31 ²	NA	Requested
Carbon Monoxide (CO)	10.10 ²	NA	Requested
Hydrochloric Acid	0.35 ⁹	NA	NESHAP Area Source
Total HAP	1.10 ⁹	NA	NESHAP Area Source

¹ The emission limit is expressed as the average of three runs.

² Established in Project Number 23-125 to keep this project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability.

³ Established in Project Number 23-125 for attainment and maintenance of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ PM_{2.5} potential emissions are assumed to be equal to PM₁₀ potential emissions.

⁵ The emission limit is based on a six-minute average.

⁶ An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁷ Standard applies when Rotary Lime Kiln 3 fires either on only solid fuels or on a combination of fuels (solid and gaseous fuels).

⁸ Standard applies when Rotary Lime Kiln 3 fires on only gaseous fuels.

⁹ Established in Project Number 23-125 to maintain potential emissions from Plant Number 82-01-015 below “major source” thresholds for purposes of the National Emission Standards for Hazardous Air Pollutants (NESHAP) applicability as defined in 40 CFR §63.2 of Subpart A and as adopted in 567 IAC 23.1(4).

2. Compliance Demonstration(s)

If an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

Table 4 - Compliance Demonstrations

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	Stack Test ¹	Initial	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M, Method 202
		One Time		
PM ₁₀ ²	Stack Test ¹	Initial	1 hour	40 CFR 51, Appendix M, Method 201A with 202
		One Time		
PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, Method 201A with 202
Opacity	Stack Test ¹	Initial	1 hour	40 CFR 60, Appendix A, Method 9
		One Time		
		One Time		
SO ₂	None	NA	1 hour	40 CFR 60, Appendix A, Method 6C

¹ The owner or operator shall conduct stack testing one time on EP LP-4 to demonstrate compliance with the applicable emission limits in Permit Condition 1, Table 3.

² The owner or operator may conduct stack testing for total particulate matter (*40 CFR 60, Appendix M, Method 5 and 40 CFR 51, Appendix M, Method 202*) to demonstrate compliance with the PM₁₀ emission limit in Permit Condition 1, Table 3.

**Table 5 - Compliance Demonstrations
(Continued)**

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
NO _x	Stack Test ¹	Initial	1 hour	40 CFR 60, Appendix A, Method 7E
		One Time		
VOC	None	NA	1 hour	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18
CO	Stack Test ¹	Initial	1 hour	40 CFR 60, Appendix A, Method 10
		One Time		
HAP	None	NA	1 hour	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18

¹ The owner or operator shall conduct stack testing one time on EP LP-4 to demonstrate compliance with the applicable emission limits in Permit Condition 1, Table 3.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 25.1(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the stack tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed in the table below.

Table 6 – Emission Point Parameters

Parameter	Value
Stack Height (feet from the ground)	110
Discharge Style	Vertical, unobstructed
Stack Outlet Dimensions (inches)	96
Exhaust Temperature (°F)	108
Exhaust Flowrate (scfm)	41,829

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

- (1) The Rotary Lime Kiln 3 (EU K-3) is located at a lime manufacturing plant that is affected by Title 40 of the Code of Federal Regulations (CFR), Part 60, Subpart HH (*Standards of Performance for Lime Manufacturing Plants*). However, this emission unit is not subject to Subpart HH, because it was constructed prior to May 3, 1977, and it has not been modified (as defined in §60.2 of Subpart A) since its construction.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (1) This facility (Plant No. 82-01-015) is of the source category affected by 40 CFR Part 63, Subpart AAAAA (*National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants*). However, Plant No. 82-01-015 is not subject to this subpart, because it has been determined under 40 CFR §63.7142 of Subpart AAAAA that this facility is a NESHAP area source.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by this permit shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The owner or operator shall use the following fuels as the only fuels combusted in the Rotary Lime Kiln 3 (EU K-3). Solid Fuels: coal and petroleum coke. Gaseous fuels: natural gas and landfill gas.
 - (1) The owner or operator shall maintain a record of the type of fuels burned in the Rotary Lime Kiln 3 (EU K-3).
 - (2) Prior to burning any other fuels in the Rotary Lime Kiln 3 (EU K-3), the owner or operator shall apply for and obtain an amended construction permit from the Department.
- B. The owner or operator shall operate, inspect, and maintain the control equipment covered by this permit according to the manufacturer's specifications and instructions.
 - (1) The owner or operator shall keep a log of all maintenance and inspection activities performed on the control equipment covered by this permit. At a minimum, this log shall include the date that any inspection and/or maintenance was performed; any issues identified during inspection and maintenance activities; and the date each issue was resolved.
- C. Whenever the Rotary Lime Kiln 3 (EU K-3) is in operation, the owner or operator shall take reasonable precautions to prevent the discharge of dust emissions beyond the lot line of the property.
- D. To ensure the requested changes evaluated under Project Number 23-125 will cause a NO_x emissions increase that is below the PSD significance thresholds, the owner or operator shall restrict the stone feed throughput for the Rotary Lime Kiln 3 (EU K-3) to no more than 73,500 tons per 12-month rolling period.
 - (1) The owner or operator shall maintain the following monthly records:
 - a. The amount, in tons, of the total stone feed throughput for the Rotary Lime Kiln 3 (EU K-3).
 - b. The rolling 12-month amount, in tons, of the total stone feed throughput for the Rotary Lime Kiln 3 (EU K-3).
 - (2) The owner or operator shall install, calibrate, maintain, and operate a device for measuring the mass rate of lime products from the Rotary Lime Kiln 3 (EU K-3).

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in this permit, any control equipment covered by this permit shall operate at all times when the emission unit(s) covered by this permit are in operation.

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
- (2) This current amendment becomes void.

11. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

- A. The owner or operator shall furnish the Department the following written notifications:
- (1) In accordance with 567 IAC 22.3(3)“b”, dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)“b” shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)“b”.
 - (2) In accordance with 567 IAC 22.3(3)“f”, when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
 - (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
 - (4) Unless specified, in accordance with a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.
- If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.
- B. The owner or operator shall furnish the Department with the following reports:
- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.
 - (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.
 - (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).

- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Table 7 – Permit History

Project No.	Permit No.	Description	Stack Testing	Date
-	73-A-219	Issue Original Permit	No	12/20/1973
95-432	73-A-219-S1	Add Rotary Lime Kiln 4	Yes	09/16/1996
01-220	73-A-219-S2	Amend Emission Limits and Flowrate	Yes	12/09/2003
04-041	73-A-219-S3	Amend Operating Condition Language	Yes	02/03/2004
04-082	73-A-219-S4	Amend Typo in Permit	Yes	02/11/2004
10-258	73-A-219-S5	Replace Multi-clones on Kilns 1 - 3	No	08/04/2010
14-174	73-A-219-S6	Install a new Fan on EP LP-4 for Kilns 1, 2, 3, and 4	Yes	08/29/2014
17-118	73-A-219-S7	Amend Equipment List to add Unpermitted Units; Modify Stack Diameter; and Update Control Equipment Description	No	03/13/2018
19-406	73-A-219-S8	Replace Damaged Stack; Modify Stack Height and Diameter	Yes	02/26/2020

END OF PERMIT



Air Quality Construction Permit

Permit Number: 23-A-169-S1

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corp

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

(563) 324-1931 x 1140
dosland@linwoominig.com

401 E Front St
Davenport, IA 52804

Permitted Equipment

Emission Point ID: EP LP-40

Table 1 – Emission Unit(s) and Control Equipment

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
Rotary Lime Kiln 4 System (See Permit Condition 3, Table 7 for Equipment Description)			

Equipment Location: 401 East Front Street
Davenport, Iowa 52804

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Table 2 – Project Issuance Information

Project Number	Project Description	Stack Testing	Issuance Date
25-405	Amend Stack Characteristics	Yes	03/05/2026

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

**Table 3 – Federal Emission Limits
(New Source Performance Standards)**

Pollutant	Limits	Reference/Basis
Particulate Matter (PM) – Federal	0.60 lb/ton stone feed ¹	40 CFR §60.342(a)(1) [567 IAC 23.1(2)“y”] ²
Opacity	15% ³	40 CFR §60.342(a)(2) [567 IAC 23.1(2)“y”] ²

¹ The emission limit is expressed as the average of three runs.

² Department’s reference to 40 CFR Part 60, Subpart HH – *Standards of Performance for Lime Manufacturing Plants* [40 CFR §60.340 – 40 CFR §60.344].

³ The emission limit is based on a six-minute average.

Table 4 – State Emission Limits

Pollutant	lb/hr ¹	Other Limits	Reference/Basis
Particulate Matter (PM) – State	NA	0.1 gr/scf ¹	567 IAC 23.4(8)
	11.16 ²	NA	Requested
PM ₁₀	11.16 ^{3,4}	NA	NAAQS
Sulfur Dioxide (SO ₂)	NA	0.6 lb/MMBtu ^{1,5}	567 IAC 23.3(3)“a”(3)
	NA	500 ppm _v ^{1,6}	567 IAC 23.3(3)“e”
	5.10 ²	NA	Requested

¹ The emission limit is expressed as the average of three runs.

² Established in Project Number 23-125 to keep this project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability.

³ Re-established in Project Number 25-405 for attainment and maintenance of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ PM_{2.5} potential emissions are assumed to be equal to PM₁₀ potential emissions.

⁵ Standard applies when Rotary Lime Kiln 4 fires either on only solid fuels or on a combination of fuels (solid and gaseous fuels).

⁶ Standard applies when Rotary Lime Kiln 4 fires on only gaseous fuels.

**Table 4 – State Emission Limits
(Continued)**

Pollutant	lb/hr¹	Other Limits	Reference/Basis
Nitrogen Oxides (NO _x)	31.70 ²	NA	Requested
Volatile Organic Compounds (VOC)	3.28 ²	NA	Requested
Carbon Monoxide (CO)	25.20 ²	NA	Requested
Hydrochloric Acid	1.80 ³	NA	NESHAP Area Source
Total HAP	3.34 ³	NA	NESHAP Area Source

¹ The emission limit is expressed as the average of three runs.

² Established in Project Number 23-125 to keep this project minor for purposes of the PSD applicability.

³ Established in Project Number 23-125 to maintain potential emissions from Plant Number 82-01-015 below “*major source*” thresholds for purposes of the National Emission Standards for Hazardous Air Pollutants (NESHAP) applicability as defined in 40 CFR §63.2 of Subpart A and as adopted in 567 IAC 23.1(4).

2. Compliance Demonstration(s)

If an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

Table 5 - Compliance Demonstrations

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – Federal	Stack Testing ¹	Initial	1 hour	40 CFR 60, Appendix A, Method 5
		One Time		
PM – State	Stack Testing ²	Initial	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M, Method 202
		One Time		
PM ₁₀ ³	Stack Testing ²	Initial	1 hour	40 CFR 51, Appendix M, Method 201A with 202
		One Time		
PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, Method 201A with 202
Opacity ⁴	Opacity Monitor	Continuous	1 hour	40 CFR 60, Appendix A, Method 9
SO ₂	None	NA	1 hour	40 CFR 60, Appendix A, Method 6C
NO _x	Stack Testing ²	Initial	1 hour	40 CFR 60, Appendix A, Method 7E
		One Time		
VOC	None	NA	1 hour	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18
CO	Stack Testing ²	Initial	1 hour	40 CFR 60, Appendix A, Method 10
		One Time		
HAP	None	NA	1 hour	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18

¹ The owner or operator shall conduct stack testing one time on EP LP-40 to demonstrate compliance with the emission limit in Permit Condition 1, Table 3.

² The owner or operator shall conduct stack testing one time on EP LP-40 to demonstrate compliance with the applicable emission limits in Permit Condition 1, Table 4.

³ The owner or operator may conduct stack testing for total particulate matter (*40 CFR 60, Appendix M, Method 5 and 40 CFR 51, Appendix M, Method 202*) to demonstrate compliance with the PM₁₀ emission limit in Permit Condition 1, Table 3.

⁴ Compliance with the opacity emission limit in Permit Condition 1, Table 3 shall be demonstrated through the use of a Continuous Opacity Monitoring System (COMS). See Permit Condition 6 for more details.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 21.10(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department for review no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed in the table below.

Table 6 – Emission Point Parameters

Parameter	Value
Stack Height (feet from the ground)	140
Discharge Style	Vertical, unobstructed
Stack Outlet Dimensions (inches)	84
Exhaust Temperature (°F)	(250 - 450) *
Exhaust Flowrate (scfm)	(74,355 - 121,200) *

*The temperature range and the airflow range depend on the product processed by Rotary Lime Kiln 4 (EU K-4). If it is determined that the kiln operates in such a manner as to cause an exhaust temperature and/or airflow outside of this range, then the owner or operator shall submit a permit application requesting to amend the permit.

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

The equipment listed below is associated with EP LP-40.

Table 7 – Emission Units and Control Equipment

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
EU K-4	Rotary Lime Kiln 4 (225 MMBtu/hour)	21.875 tons/hour	Baghouse (CE LP-40A)
			Selective Noncatalytic Reduction System (CE LP-40B)
			Lime Injection System (CE LP-40C)
EU LP-41	Elevator 431	50 tons/hour	Baghouse (CE LP-40A)
EU LP-42	Conveyor 446	50 tons/hour	
EU LP-50	West Kiln Run Tank	900 tons/hour	
EU LP-51	East Kiln Run Tank	900 tons/hour	

4. Federal Standards

A. New Source Performance Standards (NSPS):

(1) The following subparts apply to the emission unit listed below:

Table 8 – Applicable NSPS Standards

EU ID	Subpart	Title	Type	State Reference (567 IAC)	Federal Reference (40 CFR)
EU K-4	A	General Provisions	NA	23.1(2)	§60.1 – §60.19
	HH	Standard of Performance for Lime Manufacturing Plants	Rotary Lime Kiln	23.1(2)“y”	§60.340 – §60.344

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

(1) This facility (Plant No. 82-01-015) is of the source category affected by 40 CFR Part 63, Subpart AAAAAA (*National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants*). However, Plant No. 82-01-015 is not subject to this subpart, because it has been determined under 40 CFR §63.7142 of Subpart AAAAAA that this facility is a NESHAP area source.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by this permit shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The owner or operator shall decommission Rotary Lime Kiln 1 (EU K-1) and Rotary Lime Kiln 2 (EU K-2) within 180 days from the issuance of Permit No. 23-A-169-S1.

- (1) The owner or operator shall record the date Rotary Lime Kiln 1 (EU K-1) and Rotary Lime Kiln 2 (EU K-2) are decommissioned.

General Requirements

- B. The owner or operator shall use the following fuels as the only fuels combusted in the Rotary Lime Kiln 4 (EU K-4). Solid Fuels: coal and petroleum coke. Gaseous fuels: natural gas and landfill gas.

- (1) The owner or operator shall maintain a record of the type of fuels burned in the Rotary Lime Kiln 4 (EU K-4).

- (2) Prior to burning any other fuels in the Rotary Lime Kiln 4 (EU K-4), the owner or operator shall apply for and obtain an amended construction permit from the Department.

- C. To ensure the requested changes evaluated under previous Project Number 23-125 will cause a NO_x emissions increase that is below the PSD significance thresholds, the owner or operator shall restrict the stone feed throughput for the Rotary Lime Kiln 4 (EU K-4) to no more than 183,750 tons per 12-month rolling period.

- (1) The owner or operator shall maintain the following monthly records:

- a. The amount, in tons, of the total stone feed throughput for the Rotary Lime Kiln 4 (EU K-4).
- b. The rolling 12-month amount, in tons, of the total stone feed throughput for the Rotary Lime Kiln 4 (EU K-4).

- (2) As indicated in 40 CFR §60.343(d) of Subpart HH, the owner or operator of a lime manufacturing plant subject to this subpart shall install, calibrate, maintain, and operate a device for measuring the mass rate of stone feed to the Rotary Lime Kiln 4 (EU K-4). The measuring device used shall be accurate to within ± 5 percent of the mass rate over its operating range.

- D. The owner or operator shall operate, inspect, and maintain the control equipment covered by this permit according to the manufacturer's specifications and instructions.

- (1) The owner or operator shall keep a log of all maintenance and inspection activities performed on the control equipment covered by this permit. At a minimum, this log shall include the date that any inspection and/or maintenance was performed; any issues identified during inspection and maintenance activities; and the date each issue was resolved.

Control Equipment Monitoring Requirements

Baghouse (CE LP-40A)

E. The owner or operator shall either:

- a. Install, calibrate, maintain, and operate a continuous monitoring system to monitor and record the opacity of a representative portion of the gases discharged to the atmosphere from the Rotary Lime Kiln 4 (EU K-4).

Or

- b. Conduct opacity monitoring for those periods when the Rotary Lime Kiln 4 (EU K-4) is in operation per an EPA approved alternative opacity monitoring program.

Selective Noncatalytic Reduction System (CE LP-40B)

F. The owner or operator shall operate the Selective Noncatalytic Reduction (SNCR) System (CE LP-40B) as necessary to meet the NO_x emission limit in Permit Condition 1, Table 4.

- (1) The owner or operator shall record the amount of ammonia injected into the Rotary Lime Kiln 4 (EU K-4) on a continuous basis whenever the SNCR System (CE LP-40B) is operated.

Lime Injection System (CE LP-40C)

A. The owner or operator shall operate the Lime Injection System (CE LP-40C) as necessary to meet the SO₂ emission limit in Permit Condition 1, Table 4.

- (1) The owner or operator shall record the amount of lime injected into the Rotary Lime Kiln 4 (EU K-4) on a continuous basis whenever the Lime Injection System (CE LP-40C) is operated.

6. Continuous Monitoring Systems (CMS)

The facility (Plant Number 82-01-015) shall either:

- (1) Install, calibrate, maintain, and operate a continuous emission monitoring system (CEMS) for measuring the opacity of the emissions discharged to the atmosphere and record the output of the system for all periods when the Rotary Lime Kiln 4 is in operation in accordance with the New Source Performance Standards (NSPS) Subpart HH (*Standards of Performance for Lime Manufacturing Plants*). The system shall be designed to meet the 40 CFR 60, Appendix B, Performance Specification 1 (PS1).

Or

- (2) Conduct opacity monitoring for those periods when the Rotary Lime Kiln 4 (EU K-4) is in operation per an EPA approved alternative opacity monitoring program.
-

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in this permit, any control equipment covered by this permit shall operate at all times when the emission unit(s) covered by this permit are in operation.

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
- (2) This current amendment becomes void.

11. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

- A. The owner or operator shall furnish the Department the following written notifications:
- (1) In accordance with 567 IAC 22.3(3)“b”, dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)“b” shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)“b”.
 - (2) In accordance with 567 IAC 22.3(3)“f”, when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
 - (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
 - (4) Unless specified, in accordance with a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.
- If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.
- B. The owner or operator shall furnish the Department with the following reports:
- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.
 - (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.
 - (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).

- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Table 9 – Permit History

Project No.	Permit No.	Description	Stack Testing	Issuance Date
23-125	23-A-169	Issue a Separate Construction Permit to Rotary Lime Kiln 4 and Associated Equipment. The kiln and associated equipment were last included in Permit No. 73-A-219-S8 (EP LP-4)	Yes	10/11/2024

END OF PERMIT



Air Quality Construction Permit

Permit Number: 25-A-229

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:

Darin Osland
Environmental Manager

Responsible Party:

Same

(563) 324-1391, Ext. 1140
dosland@linwoodmining.com

401 E Front St
Davenport, IA 52804

Permitted Equipment

Emission Point ID: EP HR-Bluff

Table 1 – Emission Unit(s) and Control Equipment

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
Bluff Haul Roads See Emission Unit Description in Tables 6.A and 6.B			

Equipment Location: 401 E Front Street
Davenport, Iowa 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Table 2 – Project Issuance Information

Project Number	Project Description	Stack Testing	Issuance Date
25-225	Replace Permit Nos. 18-A-108-S1 and 18-A-109-S1; Increase Unpaved Road Silt Limit; Remove Road Segments 54 and 82; Add Segments 80 and 81; and Amend Emission Limits	No	12/10/2025

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

Table 3 – Emission Limits

Pollutant	lb/day	Other Limits	Reference/Basis
Particulate Matter (PM) – State	2,373.36 ¹	NA	NA
PM ₁₀	637.92 ^{1,2}	NA	NAAQS
PM _{2.5}	72.24 ¹	NA	NA
Opacity	NA	See Footnote 3	567 IAC 23.3(2)“c”

¹ Established in Project Number 25-225 to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability. The emission limit is based on a maximum silt content of 7.1 percent for the Bluff unpaved haul roads and a maximum silt loading of 8.2 g/m² for the Bluff paved haul roads.

² Established in Project Number 25-225 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

³ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property.

2. Compliance Demonstration(s)

If an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

**Table 4.A - Compliance Demonstrations
(Bluff Unpaved Roads)**

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	Silt Testing	Quarterly	NA	AP-42, Appendix C.1 and Appendix C.2 ¹
	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M Method 202
PM ₁₀	Silt Testing	Quarterly	NA	AP-42, Appendix C.1 and Appendix C.2 ¹
	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
PM _{2.5}	Silt Testing	Quarterly	NA	AP-42, Appendix C.1 and Appendix C.2 ¹
	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

¹ Silt load testing shall be conducted according to the procedures outlined in AP-42, Appendix C.1 (*Procedures for Sampling Surface/Bulk Dust Loading*) and C.2 (*Procedures for Laboratory Analysis of Surface/Bulk Dust Loading Samples*).

**Table 5.B - Compliance Demonstrations
(Bluff Paved Roads)**

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	Silt Testing	Quarterly	NA	AP-42, Appendix C.1 and Appendix C.2 ¹
	Recordkeeping	See Footnote 2	NA	NA
	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M Method 202
PM ₁₀	Silt Testing	NA	NA	AP-42, Appendix C.1 and Appendix C.2 ¹
	Recordkeeping	See Footnote 2	NA	NA
	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
PM _{2.5}	Silt Testing	NA	NA	AP-42, Appendix C.1 and Appendix C.2 ¹
	Recordkeeping	See Footnote 2	NA	NA
	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

¹ Silt load testing shall be conducted according to the procedures outlined in AP-42, Appendix C.1 (*Procedures for Sampling Surface/Bulk Dust Loading*) and C.2 (*Procedures for Laboratory Analysis of Surface/Bulk Dust Loading Samples*).

² See Permit Condition 5 for the required recordkeeping requirements.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 21.10(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department for review no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed in the table below.

Table 6 – Emission Point Parameters

Parameter	Value
Stack Height (feet from the ground)	*
Discharge Style	*
Stack Outlet Dimensions (inches)	*
Exhaust Temperature (°F)	*
Exhaust Flowrate (scfm)	*

* There is no physical stack associated with Bluff Haul Roads (EU HR-Bluff). Emissions from EU HR-Bluff are fugitive emissions generated by vehicle traffic.

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

The road segments listed below are associated with the Bluff Haul Roads.

Table 6.A – Bluff Unpaved Haul Roads and Control Measures

EU Name	Operating Vehicle Miles Traveled (miles/year)	Control Measures
Unpaved Segment 41	603.50	Dust Mitigation*
Unpaved Segment 42	162.92	
Unpaved Segment 43	6,535.10	
Unpaved Segment 44	713.84	
Unpaved Segment 45	970.70	
Unpaved Segment 46	149.99	
Unpaved Segment 47	260.01	
Unpaved Segment 48	94.39	
Unpaved Segment 49	85.74	
Unpaved Segment 50	159.38	
Unpaved Segment 51	8,537.11	
Unpaved Segment 52	27.99	
Unpaved Segment 53	754.86	
Unpaved Segment 55	5,247.62	
Unpaved Segment 56	1,275.00	
Unpaved Segment 57	805.26	
Unpaved Segment 58	2,516.44	
Unpaved Segment 59	2,479.21	
Unpaved Segment 60	29.12	
Unpaved Segment 61	111.57	
Unpaved Segment 65	796.46	
Unpaved Segment 66	3,026.92	
Unpaved Segment 67	2,338.18	
Unpaved Segment 68	72.99	
Unpaved Segment 69	2,563.74	
Unpaved Segment 70	1,347	
Unpaved Segment 71	421.19	
Unpaved Segment 72	1,425.19	
Unpaved Segment 73	996.64	
Unpaved Segment 74	100.7	
Unpaved Segment 75	103.25	
Unpaved Segment 80	1,203.75	
Unpaved Segment 83	5,331.27	
Unpaved Segment 84	4,817.65	

*See Permit Condition 5 for dust mitigation requirements.

Table 6.B – Bluff Paved Haul Roads and Control Measures

EU Name	Operating Vehicle Miles Traveled (miles/year)	Control Measures
Paved Segment 81	6,738.43	Dust Mitigation*
Paved Segment 85	12,363.34	
Paved Segment 86	10,620.85	

*See Permit Condition 5 for dust mitigation requirements.

4. Federal Standards

A. New Source Performance Standards (NSPS):

- (1) The Bluff Haul Roads (EU HR-Bluff) are not affected emission units under the federal standards of performance for new stationary sources as defined in Title 40 of the Code of Federal Regulations (CFR) Part 60, because there are no applicable categories at this time.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (1) The Bluff Haul Roads (EU HR-Bluff) are not affected emission units under the federal standards for emissions of hazardous air pollutants for source categories, as defined in 40 CFR Part 63, because there are no applicable categories at this time.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by this permit shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

Bluff Haul Roads General Requirements

- A. The owner or operator shall implement Best Management Practices to minimize fugitive emissions from the Bluff Haul Roads when in use. Such practices include, but are not limited to:

- (1) Clean up spills of raw materials and product on the haul road surface as expeditiously as possible and in a manner consistent with good practice for minimizing dust emissions.
- (2) Clean around truck scale areas and process buildings in a manner consistent with good practice for minimizing fugitive emissions.

- (3) Clean up spills of raw materials and product on Iowa Highway 22 as expeditiously as possible and in a manner consistent with good practice for minimizing dust emissions.
 - (4) Post and maintain 10 mile-per-hour speed limit signs.
 - (5) Take immediate corrective action to mitigate visible emissions. This corrective action shall include, but is not limited to, applying water or chemical suppressant, reduce or eliminate truck traffic, etc.
 - (6) Apply additional suppressant to material unloading/loading areas as necessary to prevent track out of material on the traveled road surface.
- B. The owner or operator shall develop a written plan to implement the Best Management Practices specified in Permit Condition 5.A. The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.
- C. All road surface silt loading/content testing required in this permit shall be conducted according to the procedures outlined in AP-42, Appendix C-1: Procedures for Sampling Surface/Bulk Dust Loading and Appendix C-2: Procedures for Laboratory Analysis of Surface/Bulk Dust Loading Samples.

Bluff Unpaved Haul Roads Requirements

- D. The total surface material silt content for the Bluff unpaved road segments listed in Permit Condition 3, Table 6.A shall not exceed 7.1 percent.
- E. The owner or operator shall perform road surface silt content testing on the Bluff unpaved road segments listed in Permit Condition 3, Table 6.A on a quarterly basis.
- (1) Road surface silt content testing shall be completed prior to any suppressant application.
 - (2) The owner or operator shall sample a minimum of three unpaved road segments and rotate the segments sampled for each calendar quarter.
 - a. The owner or operator shall determine the average of all samples taken for each calendar quarter, expressed as silt content for the Bluff unpaved roads.
 - (3) The owner or operator shall maintain records for each silt sampling event including, at a minimum, the following information:
 - a. The date of the silt sampling event.
 - b. Records of the road segments sampled each quarter.
 - c. The location of the sample taken.
 - d. Sample area used for silt sampling in feet.
 - e. The measured silt content as percent.
 - f. The operator's initials.
 - (4) The owner or operator shall maintain record of the average silt content results expressed as percent for each quarter.

- F. The owner or operator shall utilize control measures to reduce particulate emissions generated on the Bluff unpaved road segments, while in use, except as noted in Condition 5.F.(2) and 5.F.(3).
- (1) Chemical dust suppressant application. The owner or operator shall apply chemical dust suppressant to the road surface at minimum frequency of twice per month.
 - (2) If the suppressant cannot be applied because the ambient air temperature (as measured at the facility during daylight operating hours) will be less than 35° F (1.7° C) or conditions due to weather could create hazardous driving conditions, then the suppressant application shall be postponed and applied immediately after the scheduled date as the conditions preventing the application have abated.
 - (3) Suppressant application 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-hour time period. However, suppressant application shall resume within 24-hours after the precipitation event has ended.
- G. The owner or operator shall maintain a record of the suppressant application on the Bluff unpaved road segments. The record shall include suppressant application frequency, quantity applied and suppressant utilized. If suppressant is not applied due to weather as specified in Conditions 5.F.(2) and 5.F.(3), a written record shall be kept on site outlining the conditions and when suppressant application resumed.

Bluff Paved Haul Roads Requirements

- H. The maximum road surface silt loading (sL) present on the Bluff paved road segments listed in Permit Condition 3, Table 6.B shall not exceed 8.2 grams per square meter (g/m²).
- I. The owner or operator shall perform road surface silt loading testing on the Bluff paved road segments listed in Permit Condition 3, Table 6.B on a quarterly basis.
- (1) Surface silt loading testing shall be completed prior to any Bluff paved road sweeping or water flushing.
 - (2) For each surface silt load test, the owner or operator shall sample silt load for at least 3 different locations on the Bluff Paved Haul Roads.
 - a. The owner or operator shall determine the average of all samples taken for each calendar quarter, expressed as silt loading for the Bluff paved roads.
 - (3) The owner or operator shall maintain silt load testing records. At a minimum, the silt load testing records shall include the following information:
 - a. The date when silt load testing occurs.
 - b. Records of the road segments sampled each quarter.
 - c. The location of the sample taken.
 - d. The measured silt content in grams;
 - e. The sample area used for silt load sampling, in meters.
 - f. The operator's initials.
 - (4) The owner or operator shall maintain record of the average silt load results in g/m² for each quarter.

- J. Truck traffic emissions on the Bluff paved road segments shall be controlled by weekly sweeping, at a minimum, except as specified in Condition 5.K.(1), (2), and (3). At a minimum, the sweeper shall be an enclosed sweeper or functional equivalent as approved by the Department.
- (1) If sweeping cannot be accomplished because the ambient air temperature (as measured at the facility during daylight operating hours) will be less than 35° F (1.7° C) or conditions due to weather could create hazardous driving conditions, then the sweeping shall be postponed and accomplished as soon after the scheduled date as the conditions preventing the sweeping have abated.
 - (2) Bluff paved road 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-hour time period. However, paved road sweeping shall resume within 24-hours after the precipitation event has ended.
 - (3) Bluff paved road sweeping need not occur when the facility experiences no haul road traffic on that calendar day.
 - (4) The owner or operator shall record the frequency of cleaning/sweeping performed on the Bluff paved road segments. If the roads are not cleaned due to weather, a written record shall be kept on site outlining the conditions.
- K. Truck traffic emissions on the Bluff paved road segments shall be controlled by water flushing at a rate of 0.12 gallons per square feet, three times a day, at a minimum, except as specified in Condition 5.K.(1), (2), and (3).
- (1) If water flushing cannot be accomplished because the ambient air temperature (as measured at the facility during daylight operating hours) will be less than 35° F (1.7° C) or conditions due to weather could create hazardous driving conditions, then the sweeping shall be postponed and accomplished as soon after the scheduled date as the conditions preventing the sweeping have abated.
 - (2) Bluff paved road water flushing 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-hour time period. However, paved road sweeping shall resume within 24-hours after the precipitation event has ended.
 - (3) Bluff paved road water flushing need not occur when the facility experiences no haul road traffic on that calendar day.
 - (4) The owner or operator shall record the frequency of water flushing performed on the Bluff paved road segments. If the roads are not water flushed due to weather, a written record shall be kept on site outlining the conditions.

- L. The maximum number of trucks on Bluff Paved Road Segment 86 shall not exceed 6,355 trucks per calendar month.
- (1) The owner or operator shall record the total number of trucks on Bluff Paved Road Segment 86 for each calendar month.
 - (2) Based on throughput and storage capacity limitations, the plant truck traffic on unpaved and paved surfaces is directly proportional to the quantity of trucks measured on River Paved Road Segment 13 (*see* River Haul Roads permit) and Bluff Paved Road Segment 86 (customer output). If plant operations change, the owner or operator shall request amendment of the Bluff haul roads permit requirements.
-

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in this permit, any control equipment covered by this permit shall operate at all times when the emission unit(s) covered by this permit are in operation.

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
 - (2) This current amendment becomes void.
-

11. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

- (1) In accordance with 567 IAC 22.3(3)“b”, dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)“b” shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)“b”.
- (2) In accordance with 567 IAC 22.3(3)“f”, when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
- (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
- (4) Unless specified, in accordance with a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.

B. The owner or operator shall furnish the Department with the following reports:

- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
- (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.
- (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.

- (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).
- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Table 7 – Permit History

Project No.	Permit No.	Description	Stack Testing	Issuance Date
18-017	18-A-108	Issue Permit to the Bluff Unpaved Haul Roads to establish PM ₁₀ Emission Limits	No	09/06/2018
	18-A-109	Issue Permit to the Bluff Paved Haul Roads to establish PM ₁₀ Emission Limits		
18-366	18-A-108-S1	Update PM ₁₀ Emission Limits and Silt Content for the Bluff Unpaved Haul Roads	No	03/14/2019
	18-A-109-S1	Update PM ₁₀ Emission Limits and Silt Content for the Bluff Paved Haul Roads		

END OF PERMIT



Air Quality Construction Permit

Permit Number: 25-A-230

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:

Darin Osland
Environmental Manager

Responsible Party:

Same

(563) 324-1391, Ext. 1140
dosland@linwoodmining.com

401 E Front St
Davenport, IA 52804

Permitted Equipment

Emission Point ID: EP HR-River

Table 1 – Emission Unit(s) and Control Equipment

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
River Haul Roads See Emission Unit Description in Tables 6.A and 6.B			

Equipment Location: 401 E Front Street
Davenport, Iowa 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Table 2 – Project Issuance Information

Project Number	Project Description	Stack Testing	Issuance Date
25-225	Replace Permit Nos. 18-A-108-S1 and 18-A-109-S1; Increase Unpaved Road Silt Limit; Remove Road Segment 21; and Amend Emission Limits	No	12/10/2025

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

Table 3 – Emission Limits

Pollutant	lb/day	Other Limits	Reference/Basis
Particulate Matter (PM) – State	301.68 ¹	NA	NA
PM ₁₀	67.2 ^{1,2}	NA	NAAQS
PM _{2.5}	9.36 ¹	NA	NA
Opacity	NA	See Footnote 3	567 IAC 23.3(2)“c”

¹ Established in Project Number 25-225 to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability. The emission limit is based on a maximum silt content of 2.7 percent for the River unpaved haul roads and a maximum silt loading of 8.2 g/m² for the River paved haul roads.

² Established in Project Number 25-225 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

³ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property.

2. Compliance Demonstration(s)

If an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

**Table 4.A - Compliance Demonstrations
(River Unpaved Roads)**

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	Silt Testing	Every Other Calendar Month	NA	AP-42, Appendix C.1 and Appendix C.2 ¹
	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M Method 202
PM ₁₀	Silt Testing	Every Other Calendar Month	NA	AP-42, Appendix C.1 and Appendix C.2 ¹
	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
PM _{2.5}	Silt Testing	Every Other Calendar Month	NA	AP-42, Appendix C.1 and Appendix C.2 ¹
	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

¹ Silt load testing shall be conducted according to the procedures outlined in AP-42, Appendix C.1 (*Procedures for Sampling Surface/Bulk Dust Loading*) and C.2 (*Procedures for Laboratory Analysis of Surface/Bulk Dust Loading Samples*).

**Table 5.B - Compliance Demonstrations
(River Paved Roads)**

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	Silt Testing	Quarterly	NA	AP-42, Appendix C.1 and Appendix C.2 ¹
	Recordkeeping	See Footnote 2	NA	NA
	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M Method 202
PM ₁₀	Silt Testing	NA	NA	AP-42, Appendix C.1 and Appendix C.2 ¹
	Recordkeeping	See Footnote 2	NA	NA
	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
PM _{2.5}	Silt Testing	NA	NA	AP-42, Appendix C.1 and Appendix C.2 ¹
	Recordkeeping	See Footnote 2	NA	NA
	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

¹ Silt load testing shall be conducted according to the procedures outlined in AP-42, Appendix C.1 (*Procedures for Sampling Surface/Bulk Dust Loading*) and C.2 (*Procedures for Laboratory Analysis of Surface/Bulk Dust Loading Samples*).

² See Permit Condition 5 for the required recordkeeping requirements.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 21.10(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department for review no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed in the table below.

Table 6 – Emission Point Parameters

Parameter	Value
Stack Height (feet from the ground)	*
Discharge Style	*
Stack Outlet Dimensions (inches)	*
Exhaust Temperature (°F)	*
Exhaust Flowrate (scfm)	*

* There is no physical stack associated with River Haul Roads (EU HR-River). Emissions from EU HR-River are fugitive emissions generated by vehicle traffic.

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

The road segments listed below are associated with the Bluff Haul Roads.

Table 6.A – River Unpaved Haul Roads and Control Measures

EU Name	Operating Vehicle Miles Traveled (miles/year)	Control Measures
Unpaved Segment 2	797.17	Dust Mitigation*
Unpaved Segment 3	200.05	
Unpaved Segment 4	3,430.03	
Unpaved Segment 5	2,097.89	
Unpaved Segment 6	405.03	
Unpaved Segment 7	26.35	
Unpaved Segment 8	7,319.33	
Unpaved Segment 9	145.11	
Unpaved Segment 10	298.74	
Unpaved Segment 11	2,043.75	
Unpaved Segment 12	2,228.89	
Unpaved Segment 24	43.95	

*See Permit Condition 5 for dust mitigation requirements.

Table 6.B – River Paved Haul Roads and Control Measures

EU Name	Operating Vehicle Miles Traveled (miles/year)	Control Measures
Paved Segment 1	2,545.47	Dust Mitigation*
Paved Segment 13	2,277.55	
Paved Segment 14	114.52	
Paved Segment 15	1,289.13	
Paved Segment 16	373.29	
Paved Segment 17	121.85	
Paved Segment 18	419.18	
Paved Segment 19	612.54	
Paved Segment 20	393.75	
Paved Segment 22	388.08	
Paved Segment 23	106.55	

*See Permit Condition 5 for dust mitigation requirements.

4. Federal Standards

A. New Source Performance Standards (NSPS):

- (1) The River Haul Roads (EU HR-River) are not affected emission units under the federal standards of performance for new stationary sources as defined in Title 40 of the Code of Federal Regulations (CFR) Part 60, because there are no applicable categories at this time.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (1) The River Haul Roads (EU HR-River) are not affected emission units under the federal standards for emissions of hazardous air pollutants for source categories, as defined in 40 CFR Part 63, because there are no applicable categories at this time.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by this permit shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

River Haul Roads General Requirements

- A. The owner or operator shall implement Best Management Practices to minimize fugitive emissions from the River Haul Roads when in use. Such practices include, but are not limited to:
 - (1) Clean up spills of raw materials and product on the haul road surface as expeditiously as possible and in a manner consistent with good practice for minimizing dust emissions.
 - (2) Clean around truck scale areas and process buildings in a manner consistent with good practice for minimizing fugitive emissions.
 - (3) Clean up spills of raw materials and product on Iowa Highway 22 as expeditiously as possible and in a manner consistent with good practice for minimizing dust emissions.
 - (4) Post and maintain 10 mile-per-hour speed limit signs.
 - (5) Take immediate corrective action to mitigate visible emissions. This corrective action shall include, but is not limited to, applying water or chemical suppressant, reduce or eliminate truck traffic, etc.
 - (6) Apply additional suppressant to material unloading/loading areas as necessary to prevent track out of material on the traveled road surface.

- B. The owner or operator shall develop a written plan to implement the Best Management Practices specified in Permit Condition 5.A. The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.
- C. All road surface silt loading/content testing required in this permit shall be conducted according to the procedures outlined in AP-42, Appendix C-1: Procedures for Sampling Surface/Bulk Dust Loading and Appendix C-2: Procedures for Laboratory Analysis of Surface/Bulk Dust Loading Samples.

River Unpaved Haul Roads Requirements

- D. The total surface material silt content for the River unpaved road segments listed in Permit Condition 3, Table 6.A shall not exceed 2.7 percent.
- E. The owner or operator shall perform road surface silt content testing on the River unpaved road segments listed in Permit Condition 3, Table 6.A once every other calendar month basis.
 - (1) Road surface silt content testing shall be completed prior to any suppressant application.
 - (2) The owner or operator shall sample a minimum of three unpaved road segments and rotate the segments sampled for each calendar quarter.
 - a. The owner or operator shall determine the average of all samples taken for each calendar quarter, expressed as silt content for the River unpaved roads.
 - (3) The owner or operator shall maintain records for each silt sampling event including, at a minimum, the following information:
 - a. The date of the silt sampling event.
 - b. Records of the road segments sampled each quarter.
 - c. The location of the sample taken.
 - d. Sample area used for silt sampling in feet.
 - e. The measured silt content as percent.
 - f. The operator's initials.
 - (4) The owner or operator shall maintain record of the average silt content results expressed as percent for each quarter.

- F. The owner or operator shall utilize control measures to reduce particulate emissions generated on the River unpaved road segments, while in use, except as noted in Condition 5.F.(2) and 5.F.(3).
- (1) Chemical dust suppressant application. The owner or operator shall apply chemical dust suppressant to the road surface at minimum frequency of twice per month.
 - (2) If the suppressant cannot be applied because the ambient air temperature (as measured at the facility during daylight operating hours) will be less than 35° F (1.7° C) or conditions due to weather could create hazardous driving conditions, then the suppressant application shall be postponed and applied immediately after the scheduled date as the conditions preventing the application have abated.
 - (3) Suppressant application 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-hour time period. However, suppressant application shall resume within 24-hours after the precipitation event has ended.
- G. The owner or operator shall maintain a record of the suppressant application on the River unpaved road segments. The record shall include suppressant application frequency, quantity applied and suppressant utilized. If suppressant is not applied due to weather as specified in Conditions 5.F.(2) and 5.F.(3), a written record shall be kept on site outlining the conditions and when suppressant application resumed.

River Paved Haul Roads Requirements

- H. The maximum road surface silt loading (sL) present on the River paved road segments listed in Permit Condition 3, Table 6.B shall not exceed 8.2 grams per square meter (g/m²).
- I. The owner or operator shall perform road surface silt loading testing on the River paved road segments listed in Permit Condition 3, Table 6.B on a quarterly basis.
- (1) Surface silt loading testing shall be completed prior to any River paved road sweeping or water flushing.
 - (2) For each surface silt load test, the owner or operator shall sample silt load for at least 3 different locations on the River Paved Haul Roads.
 - a. The owner or operator shall determine the average of all samples taken for each calendar quarter, expressed as silt loading for the River paved roads.
 - (3) The owner or operator shall maintain silt load testing records. At a minimum, the silt load testing records shall include the following information:
 - a. The date when silt load testing occurs.
 - b. Records of the road segments sampled each quarter.
 - c. The location of the sample taken.
 - d. The measured silt content in grams;
 - e. The sample area used for silt load sampling, in meters.
 - f. The operator's initials.
 - (4) The owner or operator shall maintain record of the average silt load results in g/m² for each quarter.

- J. Truck traffic emissions on the River paved road segments shall be controlled by weekly sweeping, at a minimum, except as specified in Condition 5.K.(1), (2), and (3). At a minimum, the sweeper shall be an enclosed sweeper or functional equivalent as approved by the Department.
- (1) If sweeping cannot be accomplished because the ambient air temperature (as measured at the facility during daylight operating hours) will be less than 35° F (1.7° C) or conditions due to weather could create hazardous driving conditions, then the sweeping shall be postponed and accomplished as soon after the scheduled date as the conditions preventing the sweeping have abated.
 - (2) River paved road 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-hour time period. However, paved road sweeping shall resume within 24-hours after the precipitation event has ended.
 - (3) River paved road sweeping need not occur when the facility experiences no haul road traffic on that calendar day.
 - (4) The owner or operator shall record the frequency of cleaning/sweeping performed on the River paved road segments. If the roads are not cleaned due to weather, a written record shall be kept on site outlining the conditions.
- K. Truck traffic emissions on the River paved road segments shall be controlled by water flushing at a rate of 0.12 gallons per square feet, three times a day, at a minimum, except as specified in Condition 5.K.(1), (2), and (3).
- (1) If water flushing cannot be accomplished because the ambient air temperature (as measured at the facility during daylight operating hours) will be less than 35° F (1.7° C) or conditions due to weather could create hazardous driving conditions, then the sweeping shall be postponed and accomplished as soon after the scheduled date as the conditions preventing the sweeping have abated.
 - (2) River paved road water flushing 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-hour time period. However, paved road sweeping shall resume within 24-hours after the precipitation event has ended.
 - (3) River paved road water flushing need not occur when the facility experiences no haul road traffic on that calendar day.
 - (4) The owner or operator shall record the frequency of water flushing performed on the River paved road segments. If the roads are not water flushed due to weather, a written record shall be kept on site outlining the conditions.

- L. The maximum number of trucks on River Paved Road Segment 13 shall not exceed 1,053 trucks per calendar month.
- (1) The owner or operator shall record the total number of trucks on River Paved Road Segment 13 for each calendar month.
 - (2) Based on throughput and storage capacity limitations, the plant truck traffic on unpaved and paved surfaces is directly proportional to the quantity of trucks measured on Bluff Paved Road Segment 86 (*see* Bluff Haul Roads permit) and River Paved Road Segment 13 (customer output). If plant operations change, the owner or operator shall request amendment of the Bluff haul roads permit requirements.
-

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in this permit, any control equipment covered by this permit shall operate at all times when the emission unit(s) covered by this permit are in operation.

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
 - (2) This current amendment becomes void.
-

11. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

- (1) In accordance with 567 IAC 22.3(3)“b”, dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)“b” shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)“b”.
- (2) In accordance with 567 IAC 22.3(3)“f”, when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
- (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
- (4) Unless specified, in accordance with a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.

B. The owner or operator shall furnish the Department with the following reports:

- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
- (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.
- (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.

- (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).
- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Table 7 – Permit History

Project No.	Permit No.	Description	Stack Testing	Issuance Date
18-017	18-A-108	Issue Permit to the Bluff Unpaved Haul Roads to establish PM ₁₀ Emission Limits	No	09/06/2018
	18-A-109	Issue Permit to the Bluff Paved Haul Roads to establish PM ₁₀ Emission Limits		
18-366	18-A-108-S1	Update PM ₁₀ Emission Limits and Silt Content for the Bluff Unpaved Haul Roads	No	03/14/2019
	18-A-109-S1	Update PM ₁₀ Emission Limits and Silt Content for the Bluff Paved Haul Roads		

END OF PERMIT



Air Quality Construction Permit

Permit Number: 18-A-110-S2

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:

Darin Osland
Environmental Manager

Responsible Party:

Same

(563) 324-1391, Ext. 1140

dosland@linwoodmining.com

401 E Front St
Davenport, IA 52804

Permitted Equipment

Emission Point ID: Storage Piles

Table 1 – Emission Unit(s) and Control Equipment

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
Material Storage Piles See Emission Unit Description in Table 6			

Equipment Location: 401 E Front St
Davenport, Iowa 52804

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Table 2 – Project Issuance Information

Project Number	Project Description	Stack Testing	Issuance Date
25-182	Remove Material Storage Pile 16 from Emission Unit List	No	09/24/2025

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

Table 3 – Emission Limits

EU Name	Pollutant	lb/day	Other Limits	Reference/Basis
Undisturbed Storage Pile 2	Particulate Matter (PM) – State	0.38 ¹	NA	NA
	PM ₁₀	0.18 ²	NA	NAAQS
	PM _{2.5}	0.03 ¹	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“c”
Active Storage Pile 3	Particulate Matter (PM) – State	2.45 ¹	NA	NA
	PM ₁₀	1.16 ²	NA	NAAQS
	PM _{2.5}	0.18 ¹	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“c”
Active Storage Pile 5	Particulate Matter (PM) – State	5.71 ¹	NA	NA
	PM ₁₀	2.70 ²	NA	NAAQS
	PM _{2.5}	0.41 ¹	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“c”
Undisturbed Storage Pile 10	Particulate Matter (PM) – State	0.17 ¹	NA	NA
	PM ₁₀	0.08 ²	NA	NAAQS
	PM _{2.5}	0.01 ¹	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“c”
Active Storage Pile 11	Particulate Matter (PM) – State	1.90 ¹	NA	NA
	PM ₁₀	0.90 ⁴	NA	NAAQS
	PM _{2.5}	0.14 ¹	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“c”
Undisturbed Storage Pile 12	Particulate Matter (PM) – State	0.13 ¹	NA	NA
	PM ₁₀	0.06 ²	NA	NAAQS
	PM _{2.5}	0.01 ¹	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“c”

¹ Established in Project Number 25-182, per facility’s request, to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability.

² Established in Project Number 18-017 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

³ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property.

⁴ Established in Project Number 22-153 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

**Table 4 – Emission Limits
(Continue)**

EU ID	Pollutant	lb/day	Other Limits	Reference/Basis
Undisturbed Storage Pile 13	Particulate Matter (PM) – State	0.42 ¹	NA	NA
	PM ₁₀	0.20 ²	NA	NAAQS
	PM _{2.5}	0.03 ¹	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“c”
Undisturbed Storage Pile 15	Particulate Matter (PM) – State	0.34 ¹	NA	NA
	PM ₁₀	0.16 ²	NA	NAAQS
	PM _{2.5}	0.02 ¹	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“c”
Active Storage Pile 17	Particulate Matter (PM) – State	1.82 ¹	NA	NA
	PM ₁₀	0.86 ²	NA	NAAQS
	PM _{2.5}	0.13 ¹	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“c”
Undisturbed Storage Pile 18	Particulate Matter (PM) – State	1.50 ¹	NA	NA
	PM ₁₀	0.71 ²	NA	NAAQS
	PM _{2.5}	0.11 ¹	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“c”

¹ Established in Project Number 25-182, per facility’s request, to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability.

² Established in Project Number 18-017 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

³ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property.

2. Compliance Demonstration(s)

If an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

Table 5 - Compliance Demonstrations

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	None	NA	NA	AP-42, Appendix C.1 Procedures for Sampling Surface/Bulk Dust Loading, Appendix C.2 Procedures for Laboratory Analysis of Surface/Bulk Dust Loading Samples
PM ₁₀	None	NA	NA	
PM _{2.5}	None	NA	NA	
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 21.10(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department for review no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed in the table below.

Table 6 – Emission Point Parameters

Parameter	Value
Stack Height (feet from the ground)	*
Discharge Style	*
Stack Outlet Dimensions (inches)	*
Exhaust Temperature (°F)	*
Exhaust Flowrate (scfm)	*

**There is no physical stack associated with the material storage piles covered by this permit. Fugitive emissions are generated when the working face of the pile is disturbed during facility normal operation.*

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

The emission units listed in the table below are covered by this permit.

Table 6 – Emission Units and Control Equipment

EU Name	Maximum Area (square feet)	Control Equipment Description and ID
Undisturbed Storage Pile 2	12,628	None
Active Storage Pile 3	28,825	None
Active Storage Pile 5	40,166	None
Undisturbed Storage Pile 10	19,814	None
Active Storage Pile 11	33,485	None
Undisturbed Storage Pile 12	55,683	None
Undisturbed Storage Pile 13	442,704	None
Undisturbed Storage Pile 15	535,773	None
Active Storage Pile 17	203,244	None
Undisturbed Storage Pile 18	1,170,056	None

4. Federal Standards

A. New Source Performance Standards (NSPS):

- (1) The material storage piles covered by this permit are not affected emission units under the federal standards of performance for new stationary sources, as defined in Title 40 of the Code of Federal Regulations (CFR), because there are no applicable categories at this time.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (1) The material storage piles covered by this permit are not affected emission units under the federal standards for emission of hazardous air pollutants for source categories, as defined in 40 CFR Part 63, because there are no applicable categories at this time.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by this permit shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

A. The owner or operator shall operate the material storage piles covered by this permit as follows:

- (1) The maximum area for Material Storage Piles 2, 3, 5, 10, 11, 12, 13, 15, 17, and 18 shall not exceed the area, in square feet, listed in Table 6 of this permit.
 - a. The owner or operator shall maintain annual records of the area, in square feet, for each material storage pile covered by this permit.
- (2) The owner or operator shall operate (disturb) Material Storage Piles 2, 10, 12, 13, 15, and 18 no more than once per calendar month.
 - a. The owner or operator shall maintain records of the Material Storage Piles 2, 10, 12, 13, 15, and 18 disturbance frequency.
 - b. If Material Storage Pile 2, 10, 12, 13, 15, or 18 is operated (disturbed) more frequently than once per calendar month, the owner or operator shall notify the Department as specified in Condition 11 of this permit.

- (3) During high wind episodes (greater than 12 miles per hour), if visible emissions are observed from the working face of active Material Storage Pile 3, 5, 11, or 17, the owner or operator shall employ measures to eliminate or minimize emissions. Such measures may include applying dust suppressant or covering the working face of the active pile.
 - a. The owner or operator shall develop a written plan to implement, at a minimum, measures to minimize emissions during high wind episodes (greater than 12 miles per hour).
 - i. The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.
-

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in this permit, any control equipment covered by this permit shall operate at all times when the emission unit(s) covered by this permit are in operation.

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
 - (2) This current amendment becomes void.
-

11. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

- (1) In accordance with 567 IAC 22.3(3)“b”, dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)“b” shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)“b”.
- (2) In accordance with 567 IAC 22.3(3)“f”, when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
- (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
- (4) Unless specified, in accordance with a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.

B. The owner or operator shall furnish the Department with the following reports:

- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
- (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.
- (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.

- (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
- (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).
- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Table 7 – Permit History

Project No.	Permit No.	Description	Stack Testing	Issuance Date
18-017	18-A-110	Issue Permit for Material Storage Piles and Establish PM ₁₀ Emission Limits	No	09/06/2018
22-153	18-A-110-S1	Move Material Storage Pile 11 from Permit No. 18-A-114 to Permit No. 18-A-110-S1	No	12/08/2022

END OF PERMIT



Air Quality Construction Permits Collection of Air Permits

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

(563) 324-1391, Ext. 1140
dosland@linwoodmining.com

401 E Front St
Davenport, IA 52804

Project/Process Description

Limestone Barge Loadout

Equipment Location: 401 E Front St
Davenport, Iowa 52804

Project Number: 24-398

Project Description: Increase hours of operation for the East Barge Loadout (EU BL01) and the West Barge Loadout (EU BL02).

Date: May 27, 2025

The permits in this document are issued in accordance with 567 Iowa Administrative Code Chapter 22, and are issued subject to the terms and conditions contained in this document. Issuance of the permits in this document shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law. If any permit contained in this document is modified, superseded, expires, or for any other reason changes or ceases to exist, the status of that permit shall not affect the validity or enforceability of any other permit contained in this document.

Under the Direction of the Director of the
Department of Natural Resources

Table 1 - List of Emission Units, Control Equipment, Emission Points, and Permits

EP ID	EU ID	Emission Unit Description	Maximum Rated Capacity	CE Description and ID	Stack Testing	Permit Number
EP BL01	EU BL01	East Barge Loadout	400 tons/hour, limestone	Windscreen and Water Suppression (CE BL01)	No	02-A-168-S4
EP BL02	EU BL02	West Barge Loadout	575 tons/hour, limestone	Windscreen and Water Suppression (CE BL02)	No	02-A-169-S4

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in any permit contained in this “Collection of Air Permits.”

A. The following federal emission limits shall not be exceeded for the following emission points:

**Table 2 - Federal Emission Limits
(New Source Performance Standards)**

EP ID	Pollutant	Limits	Reference/Basis
EP BL01 EP BL02	Opacity (Conveyor)	10% ^{1,2}	40 CFR Part 60, Subpart OOO, Table 3 [567 IAC 23.1(2)“bbb”] ³

¹ The emission limit is based on a six-minute average.

² Per Table 3 of Part 60, Subpart OOO and as indicated in §60.672(b), the owner or operator shall meet an opacity limit of 10% for affected sources without capture systems that commenced construction, modification, or reconstruction after 8/31/1983, but before 4/22/2008.

³ Department’s reference to 40 CFR Part 60, Subpart OOO – *Standards of Performance for Nonmetallic Mineral Processing Plants* [40 CFR §60.670 – 40 CFR §60.676].

B. The following emission limits shall not be exceeded per emission point:

Table 3 - Emission Point Specific Emission Limits

EP ID	Pollutant	lb/hr ¹	Other Limits	Reference/Basis
EP BL01	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.24 ²	NA	NA
	PM ₁₀	0.11 ^{3,4}	NA	NAAQS
EP BL02	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.34 ²	NA	NA
	PM ₁₀	0.16 ^{3,4}	NA	NAAQS

¹ The emission limit is expressed as the average of three stack test runs.

² Established in Project Number 24-398 to restrict potential emissions for this emission point.

³ Established in Project Number 24-398 for attainment and maintenance of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the state implementation plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ PM_{2.5} potential emissions are assumed to be equal to PM₁₀ potential emissions.

2. Compliance Demonstration(s)

For each Emission Point listed in the “Compliance Demonstrations” table, if an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

Table 4 - Compliance Demonstrations

EP ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EP BL01	PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
	PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
EP BL02	PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 21.10(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department for review no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

The emission points shall conform to the specifications listed below:

Table 5 - Emission Point Characteristics

EP ID	Stack Height (feet)	Discharge Style	Stack Opening (inches)	Stack Temperature (°F)	Exhaust Flowrate (scfm)
EP BL01	*	*	*	*	*
EP BL02	*	*	*	*	*

** Emissions from the limestone barge loadout do not vent through a physical stack.*

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

- (1) The following subparts apply to the East Barge Loadout (EU BL01) and the West Barge Loadout (EU BL02):

Table 6 – Applicable NSPS Standards

Subpart	Title	Type	State Reference (567 IAC)	Federal Reference (40 CFR)
A	General Provisions	NA	23.1(2)	§60.1 – §60.19
OOO	Standards of Performance for Nonmetallic Mineral Processing Plants	Construction, modification, or reconstruction after 8/31/1983, but before 4/22/2008	23.1(2)“bbb”	§60.670 - §60.676

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (1) This facility (Plant No. 82-01-015) is of the source category affected by 40 CFR Part 63, Subpart AAAAAA (*National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants*). However, Plant No. 82-01-015 is not subject to this subpart, because it has been determined under 40 CFR §63.7142 of Subpart AAAAAA that this facility is a NESHAP area source.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by these permits shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for these permits shall be:

- A. The owner or operator shall operate the East Barge Loadout (EU BL01) and the West Barge Loadout (EU BL02) as follows:
 - (1) The East Barge Loadout (EU BL01) and the West Barge Loadout (EU BL02) are restricted to a maximum combined throughput of no more than 13,800 tons of limestone per calendar day.
 - a. The owner or operator shall install equipment necessary to monitor the throughput for the East Barge Loadout (EU BL01) and the West Barge Loadout (EU BL02). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the East Barge Loadout (EU BL01) and the West Barge Loadout (EU BL02) total throughput, in tons, for each calendar day.
 - (2) Simultaneous operation of the East Barge Loadout (EU BL01) and the West Barge Loadout (EU BL02) is not allowed; therefore, the owner or operator shall operate either the East Barge Loadout (EU BL01) *or* the West Barge Loadout (EU BL02) at one time.
 - a. The owner or operator shall maintain the following daily records:
 - i. Date;
 - ii. Operation times (start and stop) for the East Barge Loadout (EU BL01); and
 - iii. Operation times (start and stop) for the West Barge Loadout (EU BL02).
- B. The owner or operator shall develop an operating and maintenance plan for each water suppression system (CE BL01 and CE BL02), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - (1) The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance activities.
- C. The owner or operator shall conduct visible emissions observations each time that the East Barge Loadout (EU BL01) and the West Barge Loadout (EU BL02) are used. This requirement shall not apply on the days that the associated processing units are not in operation.
 - (1) The owner or operator shall record the date and time of the observation and the presence or absence of visible emissions.
 - (2) If visible emissions are observed, the owner or operator shall:
 - a. Operate the applicable water suppression system.
 - b. Investigate the affected emission units and make corrections to the associated equipment.

D. The owner or operator shall comply with the applicable requirements in 40 CFR Part 60, Subpart OOO [*Standards of Performance for Nonmetallic Mineral Processing Plants* (§60.670 - §60.676)].

(1) The owner or operator shall comply with the applicable reporting and recordkeeping requirements in 40 CFR §60.676 of Subpart OOO.

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Department Review

These permits are issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in these permits, any control equipment covered by these permits shall operate at all times when the emission unit(s) covered by these permits are in operation.

These permits are issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause the affected permit or permits to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

These permits are for the construction and operation of specific emission unit(s), control equipment, and emission point(s) as described in these permits and in the applications for these permits. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in these permits conform to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter any of the emission unit(s), or emission point(s), or the associated control equipment without the required amended permit(s).

Any owner or operator of the specified emission unit(s), emission point(s), or associated control equipment, including any person who becomes an owner or operator subsequent to the issuance date of the affected permit(s), is responsible for assuring that the installation, operation, and maintenance of the equipment listed in the permit(s) is in compliance with the provisions of the permit(s) and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, these permits are not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend the permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) The permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
 - (2) This current amendment becomes void.
-

11. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

These requirements shall apply to each permit included in this “Collection of Air Permits” document.

- A. The owner or operator shall furnish the Department the following written notifications:
- (1) In accordance with 567 IAC 22.3(3)“b”, dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)“b” shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)“b”.
 - (2) In accordance with 567 IAC 22.3(3)“f”, when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
 - (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
 - (4) Unless specified, in accordance with a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.

- B. The owner or operator shall furnish the Department with the following reports:
- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.
 - (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.
 - (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).
- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Table 7 – Permit History

Project No.	Permit No.	Description	Stack Testing	Date
02-016	02-A-168	Issue Permit to Unpermitted EP BL01	Yes	06/20/2002
	02-A-169	Issue Permit to Unpermitted EP BL02		
18-017	02-A-168-S1	Correct Maximum Capacity; Add Water Suppression; Add Operating Restrictions	No	09/06/2018
	02-A-169-S1			
18-366	02-A-168-S2	Change Operating Hours and Increase Throughput	No	03/14/2019
	02-A-169-S2			
22-153	02-A-168-S3	Change Emission Rate and Operating Hours	No	12/08/2022
	02-A-169-S3			
24-398	02-A-168-S4	Increase hours of operation for the East Barge Loadout (EU BL01) and the West Barge Loadout (EU BL02)	No	05/27/2025
	02-A-169-S4			

END OF PERMIT



Air Quality Construction Permits Collection of Air Permits

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:

Darin Osland
Environmental Manager

Responsible Party:

Same

(563) 324-1391, Ext. 1140
dosland@linwoodmining.com

401 E Front St
Davenport, IA 52804

Project/Process Description

Limestone Barge Loadout

Equipment Location: 401 E Front St
Davenport, Iowa 52804

Project Number: 24-398

Project Description: Increase hours of operation for the East Barge Loadout (EU BL01) and the West Barge Loadout (EU BL02).

Date: May 27, 2025

The permits in this document are issued in accordance with 567 Iowa Administrative Code Chapter 22, and are issued subject to the terms and conditions contained in this document. Issuance of the permits in this document shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law. If any permit contained in this document is modified, superseded, expires, or for any other reason changes or ceases to exist, the status of that permit shall not affect the validity or enforceability of any other permit contained in this document.

Under the Direction of the Director of the
Department of Natural Resources

Table 1 - List of Emission Units, Control Equipment, Emission Points, and Permits

EP ID	EU ID	Emission Unit Description	Maximum Rated Capacity	CE Description and ID	Stack Testing	Permit Number
EP BL01	EU BL01	East Barge Loadout	400 tons/hour, limestone	Windscreen and Water Suppression (CE BL01)	No	02-A-168-S4
EP BL02	EU BL02	West Barge Loadout	575 tons/hour, limestone	Windscreen and Water Suppression (CE BL02)	No	02-A-169-S4

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in any permit contained in this “Collection of Air Permits.”

A. The following federal emission limits shall not be exceeded for the following emission points:

**Table 2 - Federal Emission Limits
(New Source Performance Standards)**

EP ID	Pollutant	Limits	Reference/Basis
EP BL01 EP BL02	Opacity (Conveyor)	10% ^{1,2}	40 CFR Part 60, Subpart OOO, Table 3 [567 IAC 23.1(2)“bbb”] ³

¹ The emission limit is based on a six-minute average.

² Per Table 3 of Part 60, Subpart OOO and as indicated in §60.672(b), the owner or operator shall meet an opacity limit of 10% for affected sources without capture systems that commenced construction, modification, or reconstruction after 8/31/1983, but before 4/22/2008.

³ Department’s reference to 40 CFR Part 60, Subpart OOO – *Standards of Performance for Nonmetallic Mineral Processing Plants* [40 CFR §60.670 – 40 CFR §60.676].

B. The following emission limits shall not be exceeded per emission point:

Table 3 - Emission Point Specific Emission Limits

EP ID	Pollutant	lb/hr ¹	Other Limits	Reference/Basis
EP BL01	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.24 ²	NA	NA
	PM ₁₀	0.11 ^{3,4}	NA	NAAQS
EP BL02	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.34 ²	NA	NA
	PM ₁₀	0.16 ^{3,4}	NA	NAAQS

¹ The emission limit is expressed as the average of three stack test runs.

² Established in Project Number 24-398 to restrict potential emissions for this emission point.

³ Established in Project Number 24-398 for attainment and maintenance of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the state implementation plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ PM_{2.5} potential emissions are assumed to be equal to PM₁₀ potential emissions.

2. Compliance Demonstration(s)

For each Emission Point listed in the “Compliance Demonstrations” table, if an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

Table 4 - Compliance Demonstrations

EP ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EP BL01	PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
	PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
EP BL02	PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 21.10(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department for review no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

The emission points shall conform to the specifications listed below:

Table 5 - Emission Point Characteristics

EP ID	Stack Height (feet)	Discharge Style	Stack Opening (inches)	Stack Temperature (°F)	Exhaust Flowrate (scfm)
EP BL01	*	*	*	*	*
EP BL02	*	*	*	*	*

** Emissions from the limestone barge loadout do not vent through a physical stack.*

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

- (1) The following subparts apply to the East Barge Loadout (EU BL01) and the West Barge Loadout (EU BL02):

Table 6 – Applicable NSPS Standards

Subpart	Title	Type	State Reference (567 IAC)	Federal Reference (40 CFR)
A	General Provisions	NA	23.1(2)	§60.1 – §60.19
OOO	Standards of Performance for Nonmetallic Mineral Processing Plants	Construction, modification, or reconstruction after 8/31/1983, but before 4/22/2008	23.1(2)“bbb”	§60.670 - §60.676

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (1) This facility (Plant No. 82-01-015) is of the source category affected by 40 CFR Part 63, Subpart AAAAAA (*National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants*). However, Plant No. 82-01-015 is not subject to this subpart, because it has been determined under 40 CFR §63.7142 of Subpart AAAAAA that this facility is a NESHAP area source.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by these permits shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for these permits shall be:

- A. The owner or operator shall operate the East Barge Loadout (EU BL01) and the West Barge Loadout (EU BL02) as follows:
 - (1) The East Barge Loadout (EU BL01) and the West Barge Loadout (EU BL02) are restricted to a maximum combined throughput of no more than 13,800 tons of limestone per calendar day.
 - a. The owner or operator shall install equipment necessary to monitor the throughput for the East Barge Loadout (EU BL01) and the West Barge Loadout (EU BL02). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the East Barge Loadout (EU BL01) and the West Barge Loadout (EU BL02) total throughput, in tons, for each calendar day.
 - (2) Simultaneous operation of the East Barge Loadout (EU BL01) and the West Barge Loadout (EU BL02) is not allowed; therefore, the owner or operator shall operate either the East Barge Loadout (EU BL01) *or* the West Barge Loadout (EU BL02) at one time.
 - a. The owner or operator shall maintain the following daily records:
 - i. Date;
 - ii. Operation times (start and stop) for the East Barge Loadout (EU BL01); and
 - iii. Operation times (start and stop) for the West Barge Loadout (EU BL02).
- B. The owner or operator shall develop an operating and maintenance plan for each water suppression system (CE BL01 and CE BL02), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - (1) The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance activities.
- C. The owner or operator shall conduct visible emissions observations each time that the East Barge Loadout (EU BL01) and the West Barge Loadout (EU BL02) are used. This requirement shall not apply on the days that the associated processing units are not in operation.
 - (1) The owner or operator shall record the date and time of the observation and the presence or absence of visible emissions.
 - (2) If visible emissions are observed, the owner or operator shall:
 - a. Operate the applicable water suppression system.
 - b. Investigate the affected emission units and make corrections to the associated equipment.

D. The owner or operator shall comply with the applicable requirements in 40 CFR Part 60, Subpart OOO [*Standards of Performance for Nonmetallic Mineral Processing Plants* (§60.670 - §60.676)].

(1) The owner or operator shall comply with the applicable reporting and recordkeeping requirements in 40 CFR §60.676 of Subpart OOO.

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Department Review

These permits are issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in these permits, any control equipment covered by these permits shall operate at all times when the emission unit(s) covered by these permits are in operation.

These permits are issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause the affected permit or permits to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

These permits are for the construction and operation of specific emission unit(s), control equipment, and emission point(s) as described in these permits and in the applications for these permits. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in these permits conform to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter any of the emission unit(s), or emission point(s), or the associated control equipment without the required amended permit(s).

Any owner or operator of the specified emission unit(s), emission point(s), or associated control equipment, including any person who becomes an owner or operator subsequent to the issuance date of the affected permit(s), is responsible for assuring that the installation, operation, and maintenance of the equipment listed in the permit(s) is in compliance with the provisions of the permit(s) and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, these permits are not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend the permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) The permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
 - (2) This current amendment becomes void.
-

11. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

These requirements shall apply to each permit included in this “Collection of Air Permits” document.

- A. The owner or operator shall furnish the Department the following written notifications:
- (1) In accordance with 567 IAC 22.3(3)“b”, dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)“b” shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)“b”.
 - (2) In accordance with 567 IAC 22.3(3)“f”, when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
 - (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
 - (4) Unless specified, in accordance with a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.

- B. The owner or operator shall furnish the Department with the following reports:
- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.
 - (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.
 - (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).
- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Table 7 – Permit History

Project No.	Permit No.	Description	Stack Testing	Date
02-016	02-A-168	Issue Permit to Unpermitted EP BL01	Yes	06/20/2002
	02-A-169	Issue Permit to Unpermitted EP BL02		
18-017	02-A-168-S1	Correct Maximum Capacity; Add Water Suppression; Add Operating Restrictions	No	09/06/2018
	02-A-169-S1			
18-366	02-A-168-S2	Change Operating Hours and Increase Throughput	No	03/14/2019
	02-A-169-S2			
22-153	02-A-168-S3	Change Emission Rate and Operating Hours	No	12/08/2022
	02-A-169-S3			
24-398	02-A-168-S4	Increase hours of operation for the East Barge Loadout (EU BL01) and the West Barge Loadout (EU BL02)	No	05/27/2025
	02-A-169-S4			

END OF PERMIT



Air Quality Construction Permit

Permit Number: 71-A-084-S13

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:

Darin Osland
Environmental Manager

Responsible Party:

Same

563-324-1931
dosland@linwoodmining.com

401 E Front Street
Davenport, IA 52804

Permitted Equipment

Emission Point ID: CC-1

Emission Unit(s) and Control Equipment:

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
*	Old Mill	*	Baghouse (CE CC-1)

*See Emission Unit list in Condition 3

Equipment Location: 401 E Front Street
Davenport, IA 52804

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Project Number	Project Description	Stack Testing	Issuance Date
20-143	Increase Dryer capacity to 57 Tons per hour	No	08/27/20

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

Pollutant	lb/hr ¹	tons/yr ²	Other Limits	Reference/Basis
Particulate Matter (PM) – Federal	NA	NA	0.032 g/dscm ^{3,4}	567 IAC 23.1(2)“bbb” ^{3,4}
Particulate Matter (PM) – State	2.48 ⁵	NA	0.1 gr/dscf	567 IAC 23.3(2)“a”
PM ₁₀	2.48 ^{5,6}	NA	NA	NA
PM _{2.5}	NA	NA	NA	NA
Opacity	NA	NA	40% ^{7, 8}	⁴ ; 567 IAC 23.3(2)“d”
Sulfur Dioxide (SO ₂)	NA	NA	500 ppm _v	567 IAC 23.3(3)“e”

¹ The emission limit is expressed as the average of three (3) runs.

² The emission limit is based on a twelve (12) month rolling total.

³ 0.032 grams per dry standard cubic meter (g/dscm) = 0.014 grains per dry standard cubic foot (gr/dscf). Limit established per 40 CFR §60.672(a).

⁴ IAC reference to NSPS Subpart OOO (Standards of Performance for Nonmetallic Mineral Processing Plants; 40 CFR §60.670 – 40 CFR §60.676). Opacity monitoring requirements in Condition 5.

⁵ Limit set in order to keep Project Number 06-105 minor for Prevention of Significant Deterioration (PSD) purposes.

⁶ The PM₁₀ limit established for attainment and maintenance of PM10 National Ambient Air Quality Standards (NAAQS) as approved into the state implementation plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁷ The emission limit is based on a six (6) minute average.

⁸ An exceedance of the indicator opacity of No Visible Emissions will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

2. Compliance Demonstration(s)

Compliance Demonstration Table

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – Federal	None	NA	1 hour	40 CFR 60, Appendix A, Method 5
PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	¹	NA	1 hour	40 CFR 60, Appendix A, Method 9

¹ Opacity test/monitoring shall be conducted per NSPS Subpart OOO (40 CFR §60.670 – 40 CFR §60.676)

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for

notification and reporting requirements.

If stack testing is required, the owner or the owner's authorized agent shall use the test method and run time listed in the "Compliance Demonstration Table" unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)"a", at the Department's request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height (feet from the ground)	72
Discharge Style	Vertical Unobstructed
Stack Outlet Dimensions (inches)	42
Exhaust Temperature (°F)	150
Exhaust Flowrate (scfm)	34,800

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

The following emission units exhaust through this emission point:

Emission Unit	Maximum Capacity	Control Equipment
Storage Tank CL2 (CC-01K)	138 tons of ingredient (limestone or ash)	Baghouse (CE CC-1)
Storage Tank CL3 (CC-01L)	138 tons of ingredient (limestone or ash)	
Old Mill Dryer (EU CC-1a) feeds to EU CC-1g*	57 tons/hr	
Old Mill Cage Mill (EU CC-1b)	40 tons/hr	
Old Mill Screen (EU CC-1c)	60 tons/hr	
Old Mill Screen (EU CC-1d)	60 tons/hr	
Old Mill Separator 1 (EU CC-1e)	40 tons/hr	
Old Mill Separator 2 (EU CC-1f)	30 tons/hr	
Old Mill Conveyors/Screws/Elevators (EU CC-1g) Includes Transfer Point CL-1 From Tank and Transfer Point CL-1 to Elevator	57 tons/hr	
Old Mill Finished Storage Tank (EU CC-1h)	1200 tons	
Old Mill Finished Storage Tank (EU CC-1i)	1200 tons	
Storage Bin (EU CC-1j)	138 tons	
Storage Bin (EU CC-1k)	138 tons	
Storage Bin (EU CC-1l)	138 tons	
Storage Bin (EU CC-1m)	138 tons	
South Tank (CC-13)	175 tons	
North Tank (CC-12)	400 tons	
#3 Loadout System (EU CC-1r) Includes a pneumatic conveyor (60 TPH), an enclosed belt conveyor (60 TPH), two load out spouts and a scale.	Total = 120 tons/hr Max allowed = 60 tons/hr	

*Old Mill Dryer (EU CC-1a) capacity is limited by Old Mill Conveyors/Screws/Elevators (EU CC-1g) capacity.

4. Federal Standards

A. New Source Performance Standards (NSPS):

The following subparts apply to the emission unit(s) in this permit:

These emission units are subject to NSPS Subparts A (General Provisions; 40 CFR §60.1 – 40 CFR §60.19) and OOO (Standards of Performance for Nonmetallic Mineral Processing Plants; 40 CFR §60.670 – 40 CFR §60.676).

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

These emission units are not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The fuel combusted in the Old Mill Dryer (EU CC-1a) is limited to either natural gas or landfill gas.
- B. The facility shall operate only one of the following conveying systems, which are associated with #3 Loadout System (EU CC-1r), at a time:
 - i. Pneumatic conveyor
 - ii. Fully enclosed belt conveyor
- C. The owner or operator shall implement written procedures onsite to ensure only one conveyor system is operated. These procedures shall be retained onsite and made available for inspection.
- D. The owner or operator shall conduct visible emissions observation (Method 22) on emission units associated with #3 Loadout System (EU CC-1r) once per calendar week.
- E. If the owner or operator observes visible emissions from emission units associated with #3 Loadout System (EU CC-1r), the owner or operator shall investigate the emission units, control equipment or operations associated with EU CC-1r and make corrections to the associated operations or equipment. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that emission units, control equipment or operations associated with EU CC-1r are not in operation.
- F. Per 40 CFR §60.674(c), the owner or operator of any affected facility for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses a baghouse to control emissions must conduct quarterly 30-minute visible emissions inspections using EPA Method 22 (40 CFR part 60, appendix A-7). The Method 22 (40 CFR part 60, appendix A-7) test shall be conducted while the baghouse is operating. The test is successful if no visible emissions are observed. If any visible emissions are observed, the owner or operator of the affected facility must initiate corrective action within 24 hours to return the baghouse to normal operation. The owner or operator must record each Method 22 (40 CFR part 60, appendix A-7) test, including the date and any corrective actions taken, in the logbook required under §60.676(b).
- G. Per 40 CFR §60.676(b), the results of each Method 22 test, including the date and any corrective actions taken.
- H. The differential pressure drop across Baghouse (CE CC-1) shall be maintained between 2 and 10 inches of water column, based on 1-hr block average.
 - a. The owner or operator shall properly operate and maintain equipment to monitor differential pressure drop across Baghouse (CE CC-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
 - b. The owner or operator shall collect and record the pressure drop across Baghouse (CE CC-1), in inches of water, at a minimum of once every 2 minutes. Calculate and record the hourly average for all readings for each 1-hour block. If the average hourly pressure drop across Baghouse (CE CC-1) falls outside the range specified in Condition 5.H., the owner or operator shall investigate Baghouse (CE CC-1) and make corrections to the baghouse. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Baghouse (CE CC-1) is not in operation.
- I. The owner or operator shall develop an operating and maintenance plan for the Baghouse (CE CC-1), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
- J. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Baghouse (CE CC-1).

6. Continuous Emission Monitoring Systems (CEMS)

Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by

the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“F”).

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or

- (2) This current amendment becomes void.
-

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

- A. The owner or operator shall furnish the Department the following written notifications:

- (1) Per 567 IAC 22.3(3)“b”:
 - (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
 - (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
- (2) Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - (b) At least seven (7) days before equipment relocation.
- (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
- (4) Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

- B. The owner or operator shall furnish the Department with the following reports:

- (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
- (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.
- (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
- (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or

systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.

- (5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)
- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau Iowa Department of Natural Resources 502 E. 9 th St. Des Moines, IA 50319 Telephone: (515) 725-8200 Fax: (515) 725-9501	Field Office 6 1023 West Madison Washington, IA 52353 Telephone: (319) 653-2135 Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Permit No.	Project No.	Description	Date	Stack Testing
71-A-084	--	Original permit.	11/29/71	No
71-A-084-S1	97-191	Revised PM ₁₀ allowable for SIP.	06/06/97	Yes
71-A-084-S2	98-059	Revised PM ₁₀ allowable for SIP.	03/25/98	Yes
71-A-084-S3	98-161	Revised PM ₁₀ allowable for SIP.	09/30/98	Yes
71-A-084-S4	01-555	Allowed use of landfill gas.	06/20/02	No
71-A-084-S5	02-296	Amended maximum capacity of EU CC-1a.	09/24/03	No
71-A-084-S6	01-220	Corrected NESHAP applicability.	12/09/03	No
71-A-084-S7	06-105	Increased PM ₁₀ allowable.	07/14/06	Yes
71-A-084-S8	12-495	Added emission units.	02/25/13	Yes
71-A-084-S9	14-186	Remove emission unit EU CC-1n	09/02/14	Yes
71-A-084-S10	15-165	Add as-built and new emission units. Modify Section 14 requirements.	09/29/15	No
71-A-084-S11	19-130	Add EU CC-17A and EU CC-17B to the equipment list	07/02/19	No
71-A-084-S12	19-356	Remove EU CC-17A and EU CC-17B from the equipment list	02/26/20	No

END OF PERMIT



Air Quality Construction Permit

Permit Number: 86-A-049-S9

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

563-324-1931
dosland@linwoodmining.com

401 E Front Street
Davenport, IA 52761

Permitted Equipment

Emission Point ID: CC-2

Emission Unit(s) and Control Equipment:

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
*	New Mill*	*	Baghouse (CE CC-2)

*See Emission Unit list in Condition 3

Equipment Location: 401 E Front Street
Davenport, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Project Number	Project Description	Stack Testing	Issuance Date
18-366	Correct permit to remove EU CC-2j from the EU list	No	03/14/19

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit.

The following emission limits shall not be exceeded:

Pollutant	lb/hr ¹	tons/yr ²	Other Limits	Reference/Basis
Particulate Matter (PM) – Federal	NA	NA	0.032 g/dscm ³	567 IAC 23.1(2)"bbb" ⁴
Particulate Matter (PM) – State	1.61 ⁵	NA	0.01 gr/scf ⁶	567 IAC 31.20(1)"d", LAER
PM ₁₀	1.61 ^{5,7}	NA	NA	NAAQS
PM _{2.5}	NA	NA	NA	NA
Opacity	NA	NA	⁴	567 IAC 23.3(2)"c"

¹ The emission limit is expressed as the average of three (3) runs.

² The emission limit is based on a twelve (12) month rolling total.

³ 0.032 grams per dry standard cubic meter (g/dscm) = 0.014 grains per dry standard cubic foot (gr/dscf). Limit established per 40 CFR §60.672(a).

⁴ IAC reference to NSPS Subpart OOO (*Standards of Performance for Nonmetallic Mineral Processing Plants*; 40 CFR §60.670 – 40 CFR §60.676).

⁵ Limit set in order to keep Project Number 06-105 minor for Prevention of Significant Deterioration (PSD) purposes.

⁶ Limit established when the Buffalo, IA area was designated nonattainment for Total Suspended Particulates (TSP). Any relaxation of the Lowest Achievable Emission Rate (LAER) after the Buffalo area is redesignated attainment for TSP is subject to review under the Prevention of Significant Deterioration (PSD) regulations in effect at the time the relaxation occurs.

⁷ The PM₁₀ limit established for attainment and maintenance of PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the state implementation plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

2. Compliance Demonstration(s)

Compliance Demonstration Table

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – Federal	None	NA	1 hour	40 CFR 60, Appendix A, Method 5
PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9
Opacity	Yes ¹	Stack Test ¹	30 minutes	40 CFR 60, Appendix A, Method 22

¹ Per 40 CFR §60.674(c), the owner or operator shall conduct quarterly thirty (30) minute visible emissions inspections using EPA Method 22 (40 CFR Part 60, Appendix A-7). The Method 22 test shall be conducted while the baghouse is operating. The test is successful if no visible emissions are observed. If any visible emissions are observed, the owner or operator of the affected facility must initiate corrective action within twenty-four (24) hours to return the baghouse to normal operation. The owner or operator of the affected facility may establish a different baghouse specific success level for the visible emissions test (other than no visible emissions) by conducting a PM performance test according to 40 CFR §60.675(b) simultaneously with Method 22 to determine what constitutes normal visible emissions from the affected facility's baghouse when it is in compliance with the applicable PM concentration limit. The revised visible emissions success level must be incorporated into the permit for the affected facility.

If an initial stack test is specified in the "Compliance Demonstration Table," the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.

- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in "Compliance Demonstration Table," the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the "Compliance Demonstration Table." See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner's authorized agent shall use the test method and run time listed in the "Compliance Demonstration Table" unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)"a", at the Department's request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height (feet from the ground)	60
Discharge Style	Vertical Unobstructed
Stack Outlet Dimensions (inches)	42
Exhaust Temperature (°F)	105
Exhaust Flowrate (scfm)	30,600

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

The following emission units are associated with this permit:

Emission Unit	Maximum Capacity
New Mill Hammermill 1 (CC-2b)	50 tons/hr
New Mill Hammermill 2 (CC-2c)	50 tons/hr
New Mill Separator Φ 18" (CC-2d)	100 tons/hr
New Mill Screen (CC-2e)	25 tons/hr
New Mill Screen (CC-2f)	25 tons/hr
New Mill Screen (CC-2g)	25 tons/hr
New Mill Screen (CC-2h)	25 tons/hr
New Mill Raymond Mill (CC-2i)	35 tons/hr

New Mill Conveyors/Screw/Elevators (CC-2k)

100 tons/hr

4. Federal Standards

A. New Source Performance Standards (NSPS):

The facility (plant number 82-01-015) is of the source type subject to Subpart HH (*Standards of Performance for Lime Manufacturing Plants*; 40 CFR §60.340 – 40 CFR §60.344) of the New Source Performance Standards (NSPS). However, the subpart only applies to rotary lime kilns so none of these emission units are subject.

These emission units are subject to NSPS Subparts A (*General Provisions*; 40 CFR §60.1 – 40 CFR §60.19) and OOO (*Standards of Performance for Nonmetallic Mineral Processing Plants*; 40 CFR §60.670 – 40 CFR §60.676).

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

This facility (plant number 82-01-015) is considered an “area source” of hazardous air pollutant (HAP) emissions and is therefore not subject to any National Emission Standards for Hazardous Air Pollutant (NESHAP) subparts as Subpart AAAAA (*National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants*; 40 CFR §63.7080 – 40 CFR §63.7143) is for major sources of HAP emissions and there are currently no subparts for lime manufacturing area sources.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The owner or operator shall maintain record per 40 CFR §60.676(b), the results of each Method 22 test, including the date and any corrective actions taken.
- B. The owner or operator shall begin monitoring the differential pressure drop across the baghouse, as specified in condition 5.C. by June 30, 2019.
 - i. The owner or operator shall maintain a record of the commencement date of the differential pressure drop monitoring of the control equipment.
- C. The differential pressure drop across Baghouse (CE CC-2) shall be maintained between 2 and 10 inches of water column, based on 1-hr block average.
 - i. The owner or operator shall properly operate and maintain equipment to monitor differential pressure drop across Baghouse (CE CC-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
 - ii. The owner or operator shall collect and record the pressure drop across Baghouse (CE CC-2), in inches of water, at a minimum of once every 2 minutes. Calculate and record the hourly average for all readings for each 1-hour block. If the average hourly pressure drop across Baghouse (CE CC-2) falls outside the range specified in Condition 5.C., the owner or operator shall investigate Baghouse (CE CC-2) and make corrections to the baghouse. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Baghouse (CE CC-2) are not in operation.
- D. The owner or operator shall develop an operating and maintenance plan for the Baghouse (CE CC-2), including a preventative maintenance schedule that is consistent with the manufacturer’s instructions for routine and long-term maintenance.
 - i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Baghouse (CE CC-2).

6. Continuous Emission Monitoring Systems (CEMS)

Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
- (2) This current amendment becomes void.

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

- (1) Per 567 IAC 22.3(3)"b":
 - (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
 - (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
- (2) Per 567 IAC 22.3(3)"f," when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - (b) At least seven (7) days before equipment relocation.
- (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
- (4) Unless specified per a federal regulation, the owner or the owner's authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

- B. The owner or operator shall furnish the Department with the following reports:
- (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.
 - (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
 - (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)
- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau Iowa Department of Natural Resources 502 E. 9 th St. Des Moines, IA 50319 Telephone: (515) 725-8200 Fax: (515) 725-9501	Field Office 6 1023 West Madison Washington, IA 52353 Telephone: (319) 653-2135 Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Permit No.	Project No.	Description	Date	Stack Testing
86-A-049	86-039	Original permit.	07/08/86	Yes
86-A-049-S1	---	Replaced baghouse.	12/26/91	No
86-A-049-S2	98-059	Revised PM10 allowable for SIP.	03/25/98	Yes
86-A-049-S3	98-161	Revised PM10 allowable for SIP.	09/30/98	Yes
86-A-049-S4	00-220	Amended flowrate.	05/23/00	Yes
86-A-049-S5	01-555	Revised PM10 allowable for SIP.	06/20/02	No
86-A-049-S6	06-105	Replaced baghouse.	07/14/06	Yes
86-A-049-S7	12-495	Added pickup point.	02/25/13	Yes
86-A-049-S8	14-186	Remove emission unit EU CC-2j and waive testing required by permit#86-A-049-S7	09/02/14	No

END OF PERMIT



Air Quality Construction Permit

Permit Number: 88-A-218-S6

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

563-324-1931
dosland@linwoodmining.com

401 E Front Street
Davenport, IA 52761

Permitted Equipment

Emission Point ID: CC-3

Emission Unit(s) and Control Equipment:

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
CC-3	Calcium Loadout *	160 tons of limestone products	Baghouse (CE CC-3)

*See Emission Unit list in Condition 3

Equipment Location: 401 E Front Street
Davenport, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Project Number	Project Description	Stack Testing	Issuance Date
16-026	Permit baghouse replacement	No	03/13/18

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

Pollutant	lb/hr ¹	tons/yr ²	Other Limits	Reference/Basis
Particulate Matter (PM) – State	NA	NA	0.02 gr/dscf	567 IAC 23.1(2)“bbb”
PM ₁₀	0.36 ³	NA	NA	NA
PM _{2.5}	NA	NA	NA	NA
Opacity	NA	NA	7% ⁴	567 IAC 23.1(2)“bbb” ⁵

¹ The emission limit is expressed as the average of three (3) runs.

² The emission limit is based on a twelve (12) month rolling total.

³ The PM₁₀ limit established for attainment and maintenance of PM10 National Ambient Air Quality Standards (NAAQS) as approved into the state implementation plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ Limit established per Table 3 of Subpart OOO Part 60.

⁵ Iowa adoption of 40 CFR Part 60 Subpart OOO.

2. Compliance Demonstration(s)

Compliance Demonstration Table

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

2. Compliance Demonstration(s) (Continued)

Per 567 IAC 25.1(7)"a", at the Department's request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height (feet from the ground)	37
Discharge Style	Vertical Unobstructed
Stack Outlet Dimensions (inches)	17
Exhaust Temperature (°F)	Ambient
Exhaust Flowrate (scfm)	1,500

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

The following emission units exhaust through this emission point:

Emission Unit	Maximum Capacity	Control Equipment
Calcium Railcar Loadout (CC-3)	160 tons of limestone per hour	Baghouse (CE CC-3)
North/South Belt (CC-3A)	160 tons of limestone per hour	
East/West Belt (CC-3B)	160 tons of limestone per hour	
Calcium Truck Loadout (CC-3C)	85 tons of limestone per hour	

4. Federal Standards

A. New Source Performance Standards (NSPS):

These emission units are subject to NSPS Subparts A (*General Provisions*; 40 CFR §60.1 – 40 CFR §60.19) and OOO (*Standards of Performance for Nonmetallic Mineral Processing Plants*; 40 CFR §60.670 – 40 CFR §60.676).

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

This emission unit is not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The maximum amount of product loaded out using the Calcium Railcar loadout shall not exceed 160 tons per hour averaged over 3-hr period.
 - i. For each hour, the owner or operator shall maintain records of the amount of product loaded out in tons.
 - ii. The owner or operator shall maintain records of the 3-hour average the amount of product loaded out in tons.
- B. The maximum amount of product loaded out using the Calcium Truck loadout shall not exceed 85 tons per hour averaged over 3-hr period.
 - i. For each hour, the owner or operator shall maintain records of the amount of product loaded out in tons.
 - ii. The owner or operator shall maintain records of the 3-hour average the amount of product loaded out in tons.
- C. The owner or operator shall begin monitoring the differential pressure drop across the baghouse, as specified in condition 5.D. by May 1, 2018.
 - i. The owner or operator shall maintain a record of the commencement date of the differential pressure drop monitoring of the control equipment.
- D. The differential pressure drop across Baghouse (CE CC-3) shall be maintained between 2 and 10 inches of water column, based on 1-hr block average.
 - i. The owner or operator shall properly operate and maintain equipment to monitor differential pressure drop across Baghouse (CE CC-3). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
 - ii. The owner or operator shall collect and record the pressure drop across Baghouse (CE CC-3), in inches of water, at a minimum of once every 2 minutes. Calculate and record the hourly average for all readings for each 1-hour block. If the average hourly pressure drop across Baghouse (CE CC-3) falls outside the range specified in Condition 5.D., the owner or operator shall investigate Baghouse (CE CC-3) and make corrections to the baghouse. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Baghouse (CE CC-3) are not in operation.
- E. The owner or operator shall develop an operating and maintenance plan for the Baghouse (CE CC-3), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Baghouse (CE CC-3).

6. Continuous Emission Monitoring Systems (CEMS)

Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or

operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)"F").

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
 - (2) This current amendment becomes void.
-

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation

of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

- (1) Per 567 IAC 22.3(3)"b":
 - (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
 - (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
- (2) Per 567 IAC 22.3(3)"f," when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - (b) At least seven (7) days before equipment relocation.
- (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
- (4) Unless specified per a federal regulation, the owner or the owner's authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:

- (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
- (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.
- (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
- (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.
- (5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be

available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 725-9549
Fax: (515) 725-9502

Field Office 6
1023 West Madison
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Permit No.	Project No.	Description	Date	Stack Testing
88-A-218		Original Permit	12/29/1988	Yes
88-A-218-S1	97-191	Revised PM ₁₀ emission limit to comply with the SIP	6/6/1997	Yes
88-A-218-S2	98-059	Revised PM ₁₀ emission limit to comply with the SIP	3/25/1998	Yes
88-A-218-S3	98-208	Changed Operating Conditions	5/8/1998	Yes
88-A-218-S4	06-071	Modify flow rate based on stack test	2/28/2006	No
88-A-218-S5	14-363	Add as-built emission units CC-3A, CC-3B, CC-3C to the equipment list	01/20/15	No

END OF PERMIT

Iowa Department of Natural Resources

Air Quality Construction Permit

Permit Holder

Firm: Linwood Mining & Minerals Corporation

Contact:

Jaci Moore
Environmental Engineer

563.324.1931

401 East Front Street
Davenport, Iowa 52804

Responsible Party:

Jeff Dahl
Vice President Chemical Operations

Permitted Equipment

Emission Unit(s): New Mill Dryer (EU CC-2a)
Maximum Firing Rate of 28.7 MMBtu per hour
Maximum Capacity of 70 tons per hour of limestone
New Mill Outside Conveyors/Screws/Elevators (EU CC-2k)
Maximum Capacity of 100 tons per hour of limestone

Control Equipment: Baghouse (CE CC-5)

Emission Point: CC-5

Equipment Location: 401 East Front Street
Davenport, Iowa 52804

Plant Number: 82-01-015

Permit No.	Project No.	Description	Date	Testing
98-A-846	98-161	Original Permit.	9/30/98	Yes
98-A-846-S1	01-555	Allowed Use of Landfill Gas in Dryer.	6/20/02	No
98-A-846-S2	06-105	Relocate Equipment.	7/14/06	No



Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20-31; and 40 CFR Parts 51, 52, 60, 61 and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f", this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least thirty (30) days prior to transferring to the new location (See 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the National Ambient Air Quality Standards. In such case, a supplemental permit shall be required prior to the initiation of construction of additional control equipment or equipment modifications needed to meet the standards.

This permit is for the construction and operation of the specific emission unit(s), control equipment and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emission unit, control equipment or emission point without the required revisions to this permit.

3. Construction

This permit shall become void if construction on the proposed project has not been initiated within eighteen (18) months after the date of the issuance of this permit and completed within thirty-six (36) months after the date of the issuance of this permit.

It shall be the responsibility of the owner to ensure that construction conforms to the final plans and specifications as submitted and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created. A supplement to this permit shall be obtained if the owner proposes changes to the final submitted plans and specifications.

4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 31.

5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

6. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

7. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

8. Notification, Reporting and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:

1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
5. Transfer of equipment ownership, within 30 days of the occurrence;
6. Portable equipment relocation, at least thirty (30) days before equipment relocation.

8. Notification, Reporting and Recordkeeping (Continued)

B. The owner shall furnish DNR with the following reports:

1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than forty-five (45) days after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following addresses:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Urbandale, IA 50322
Telephone: 515.281.8189
Fax: 515.242.5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Urbandale, IA 50322
Telephone: 515.242.6001
Fax: 515.242.5127

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Urbandale, IA 50322 Telephone: 515.281.8448 Fax: 515.242.5127	DNR Field Office 6 1023 West Madison Washington, IA 52353 Telephone: 319.653.2135 Fax: 319.653.2856

- F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to \$10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr ⁽¹⁾	Tons/Yr ⁽²⁾	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	NA	NA	0.1 gr/dscf	23.3(2)"a"
Particulate Matter (PM)	NA	NA	0.05 gr/dscm ⁽⁴⁾	23.1(2)"bbb"
Particulate Matter (PM)	NA	NA	0.01 gr/dscf ⁽⁵⁾	LAER (SIP)
PM ₁₀	0.93 ⁽³⁾	NA	NA	NAAQS
Opacity	NA	NA	7% ⁽⁴⁾	23.1(2)"bbb"
Sulfur Dioxide (SO ₂)	NA	NA	NA	NA
Nitrogen Oxides (NO _x)	NA	NA	NA	NA
Volatile Organic Compounds	NA	NA	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

⁽¹⁾ Standard is expressed as the average of 3 runs

⁽²⁾ Standard is a 12-month rolling total.

⁽³⁾ The limit for PM₁₀ emissions is also established to limit emissions below levels that predict exceedances of the annual and 24-hour NAAQS for PM₁₀.

⁽⁴⁾ Reference to Subpart OOO of the New Source Performance Standards (NSPS). See also 40 CFR §60.670 to 40 CFR §60.676. Note: 0.05 grams/dscm = 0.022 grains/dscf.

⁽⁵⁾ Limit established when the Buffalo Area was designated non-attainment for TSP (PM). Any relaxation in the Lowest Achievable Emission Rates (LAER) after the Buffalo Area is redesignated attainment for TSP (PM) is subject to review under the PSD regulations in effect at the time the relaxation occurs.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below.

Parameter	Value
Stack Height, (ft, from the ground)	97 ft
Discharge Style	Vertical, Unobstructed
Stack Opening, (inches, dia.)	30 inches
Exhaust Temperature (°F)	100°F
Exhaust Flowrate (scfm)	20,600 scfm

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flowrate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Initial Performance Testing Requirements

Pollutant	Testing Required	Test Run Time	Test Method
PM (state)	No	3 hours	Iowa Compliance Sampling Manual Method 5
PM (federal)	Yes ⁽¹⁾	3 hours	40 CFR 60, Appendix A, Method 5
PM ₁₀	Yes ⁽¹⁾	5 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	Yes ⁽¹⁾	1 hour	40 CFR 60, Appendix A, Method 9
SO ₂	No	1 hour	40 CFR 60, Appendix A, Method 6C
NO _x	No	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	No	1 hour	40 CFR 60, Appendix A, Method 25A
CO	No	1 hour	40 CFR 60, Appendix A, Method 10
Pb	No	NA	40 CFR 60, Appendix A, Method 12
Other	No	NA	

⁽¹⁾ Testing on this emission point was successfully completed on May 22, 2000. No further testing is required as a part of this project.

If specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within **60** days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed new control equipment. The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the DNR. Unless otherwise specified by the DNR, each test shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the DNR. The test methods and run times to be used are those stated above unless otherwise approved by the DNR.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the DNR shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The DNR shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

This emission unit is subject to Subpart A – General Provisions (40 CFR §60.1 through 40 CFR §60.19) of the New Source Performance Standards (NSPS) and Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants (40 CFR §60.670 through 40 CFR §60.676) and is also subject to the requirements of 567 IAC 23.1(2)"bbb".

Currently, these emission units are not subject to any National Emission Standards for Hazardous Air Pollutants (NESHAP). There are no applicable subparts.

14. Operating Limits

- A. The fuel for the New Mill Dryer (EU CC-2a) is limited to either natural gas or landfill gas.
- B. The owner or operator shall maintain the control equipment according to manufacturer's specifications and maintenance schedule.

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- A. The owner or operator shall maintain a record of all inspections/maintenance and any action resulting from the inspection/maintenance of the control equipment.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Descriptions of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
LAER	Lowest Achievable Emission Rate
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO _x	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM ₁₀	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TSP	Total Suspended Particulate
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS



Air Quality Construction Permit

Permit Number: 17-A-488-S3

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corp

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

(563) 324-1931 x 1140
dosland@linwoominig.com

401 E Front St
Davenport, IA 52804

Permitted Equipment

Emission Point ID: EP CC-16

Table 1 – Emission Unit(s) and Control Equipment:

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
#6 Limestone Loadout System (See Permit Condition 3, Table 7 for Equipment Description)			

Equipment Location: 401 East Front Street
Davenport, Iowa 52804

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Table 2 – Project Issuance Information

Project Number	Project Description	Stack Testing	Issuance Date
24-245	Add Transfer Belt to Long Conveyor (EU CC-19) back to Equipment List and Update Operating Limits	Yes	09/18/2024

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

**Table 3 – Federal Emission Limits
(New Source Performance Standards)**

Pollutant	Limits	Reference/Basis
Opacity	10% ^{1,2}	40 CFR Part 60, Subpart OOO, Table 3 [567 IAC 23.1(2)“bbb”] ³

¹ The emission limit is based on a six-minute average.

² Per Table 3 of Part 60, Subpart OOO and as indicated in §60.672(b), the owner or operator shall meet an opacity limit of 10% for affected sources without capture systems that commenced construction, modification, or reconstruction after 8/31/1983, but before 4/22/2008.

³ Department’s reference to 40 CFR Part 60, Subpart OOO – *Standards of Performance for Nonmetallic Mineral Processing Plants* [40 CFR §60.670 – 40 CFR §60.676].

Table 4 – State Emission Limits

Pollutant	lb/hr ¹	Other Limits	Reference/Basis
Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
	0.21 ²	NA	NA
PM ₁₀	0.08 ^{3,4}	NA	NAAQS

¹ The emission limit is expressed as the average of three runs.

² Established in Project Number 15-457 to restrict the potential-to-emit for this emission point.

³ Established in Project Number 15-457 for attainment and maintenance of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the state implementation plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ PM_{2.5} potential emissions are assumed to be equal to PM₁₀ potential emissions.

2. Compliance Demonstration(s)

If an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

Table 5 - Compliance Demonstrations

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M, Method 202
PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, Method 201A with 202
PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, Method 201A with 202
Opacity	Performance Test ¹	Initial One Time	See Footnote 2	40 CFR 60, Appendix A, Method 9

¹ Per Table 3 of NSPS Subpart OOO, the owner or operator of any affected facility **without a capture system** for which construction, modification, or reconstruction commenced after 8/31/1983, but before 4/22/2008, shall conduct an initial opacity test according to §60.11 of Subpart A and §60.675 of Subpart OOO.

² According to 40 CFR §60.675(c)(3) of Subpart OOO, when determining compliance with the fugitive emissions standard for any affected facility described under §60.672(b) of Subpart OOO, the duration of the Method 9 (40 CFR Part 60, Appendix A-4) observations must be 30 minutes (five 6-minute averages).

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 21.10(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department for review no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed in the table below.

Table 6 – Emission Point Parameters

Parameter	Value
Stack Height (feet from the ground)	62
Discharge Style	Vertical, unobstructed
Stack Outlet Dimensions (inches)	32 x 32
Exhaust Temperature (°F)	Ambient
Exhaust Flowrate (scfm)	2,178

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

Table 7 – Emission Units and Control Equipment

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
EU CC-16	Long Conveyor	70 tons of limestone/hour	None
EU CC-17	Granular Bin #1	70 tons of limestone/hour	
EU CC-18	Granular Bin #2	70 tons of limestone/hour	
EU CC-19	Transfer Belt to Long Conveyor	25 tons of limestone/hour	

4. Federal Standards

A. New Source Performance Standards (NSPS):

(1) The following subparts apply to the emission units covered by this permit:

Table 8 – Applicable NSPS Standards

Subpart	Title	Type	State Reference (567 IAC)	Federal Reference (40 CFR)
A	General Provisions	NA	23.1(2)	§60.1 – §60.19
OOO	Standards of Performance for Nonmetallic Mineral Processing Plants	Construction, modification, or reconstruction after 8/31/1983, but before 4/22/2008	23.1(2)“bbb”	§60.670 - §60.676

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

(1) The emission units covered by this permit are not affected emission units under the federal standards of hazardous air pollutants for source categories, as defined in 40 CFR Part 63, because there are no applicable categories at this time.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by this permit shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The owner or operator shall not operate the New Mill (EP CC-2) when the Transfer Belt to Long Conveyor (EU CC-10) is in operation.
 - (1) The owner or operator shall maintain the following daily records:
 - a. Date, operation start, and operation end time when the Transfer Belt to Long Conveyor (EU CC-19) is in operation.
 - b. Date, operation start, and operation end time for the New Mill (EP CC-2), on days when the Transfer Belt to Long Conveyor (EU CC-19) is in operation.
 - B. The #6 Limestone Loadout System (EP CC-16) is restricted to transfer no more than 70 tons of limestone per hour, averaged over a 3-hour period.
 - (1) Once every hour, the owner or operator shall collect and record the amount, in tons, of limestone transferred and calculate and record the 3-hour average using all data points collected during the averaging period. This requirement shall not apply when the #6 Limestone Loadout System (EP CC-16) is not in operation.
 - (2) The owner or operator shall install equipment necessary to monitor the amount of limestone transferred every hour the #6 Limestone Loadout System (EP CC-16) is in operation. The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - C. The owner or operator shall conduct visible emissions observations on EP CC-16 once per calendar week. This requirement shall not apply on the days that the #6 Limestone Loadout System (EP CC-16) is not in operation.
 - (1) The owner or operator shall record the date and time of the observation and the presence or absence of visible emissions.
 - (2) If visible emissions from EP CC-16 are observed, the owner or operator shall investigate the affected emission units and make corrections to the associated equipment.
 - (3) The owner or operator shall maintain a record of all corrective actions taken.
 - D. The owner or operator shall comply with the applicable requirements in 40 CFR Part 60, Subpart OOO [*Standards of Performance for Nonmetallic Mineral Processing Plants* (§60.670 - §60.676)].
 - (1) The owner or operator shall comply with the applicable reporting and recordkeeping requirements in 40 CFR §60.676 of Subpart OOO.
-

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in this permit, any control equipment covered by this permit shall operate at all times when the emission unit(s) covered by this permit are in operation.

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
- (2) This current amendment becomes void.

11. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

- A. The owner or operator shall furnish the Department the following written notifications:
- (1) In accordance with 567 IAC 22.3(3)“b”, dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)“b” shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)“b”.
 - (2) In accordance with 567 IAC 22.3(3)“f”, when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
 - (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
 - (4) Unless specified, in accordance with a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.
- If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.
- B. The owner or operator shall furnish the Department with the following reports:
- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.
 - (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.
 - (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).

- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Table 9 – Permit History

Project No.	Permit No.	Description	Stack Testing	Date
15-457	17-A-488	Issue new permit for as-built units and Establish PM10 Limits	No	03/13/2018
20-038	17-A-488-S1	Amend Permit to Add EU CC-19	Yes	05/07/2020
23-009	17-A-488-S2	Remove Transfer Belt to Long Conveyor (EU CC-19) from Equipment List and Update Operating Limits	Yes	12/04/2023

END OF PERMIT



Air Quality Construction Permit

Permit Number: 88-A-220-S5

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

563-324-1931
dosland@linwoodmining.com

401 E Front Street
Davenport, IA 52761

Permitted Equipment

Emission Point ID: LP-7

Emission Unit(s) and Control Equipment:

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
LP-7	Lime Kiln Dust Tank and Loadout*	1050 tons of lime, limestone and flyash; Loadout capacity: 240 tons per 3-hours	Baghouse (CE LP-7)

*See Emission Unit list in Condition 3

Equipment Location: 401 E Front Street
Davenport, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Project Number	Project Description	Stack Testing	Issuance Date
15-457	Route LP-7L to LP-7 baghouse	No	03/13/18

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

Pollutant	lb/hr ¹	tons/yr ²	Other Limits	Reference/Basis
Particulate Matter (PM) – State	0.63 ⁵	NA	0.1 gr/dscf	567 IAC 23.3(2)"a"
PM ₁₀	0.15 ⁶	NA	NA	NA
PM _{2.5}	NA	NA	NA	NA
Opacity	NA	NA	40% ^{3,4}	567 IAC 23.3(2)"d"

¹ The emission limit is expressed as the average of three (3) runs.

² The emission limit is based on a twelve (12) month rolling total.

³ The emission limit is based on a six (6) minute average.

⁴ An exceedance of the indicator opacity of No Visible Emissions will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁵ PM emissions limit was added to restrict PTE.

⁶ The PM₁₀ limit established for attainment and maintenance of PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the state implementation plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

2. Compliance Demonstration(s)

Compliance Demonstration Table

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

If an initial stack test is specified in the "Compliance Demonstration Table," the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in "Compliance Demonstration Table," the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the "Compliance Demonstration Table." See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner's authorized agent shall use the test method and run time listed in the "Compliance Demonstration Table" unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

2. Compliance Demonstration(s) (Continued)

Per 567 IAC 25.1(7)"a", at the Department's request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height (feet from the ground)	94
Discharge Style	Vertical Unobstructed
Stack Outlet Dimensions (inches)	12
Exhaust Temperature (°F)	100
Exhaust Flowrate (scfm)	4,350

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

This emission unit is not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

This emission unit is not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The maximum amount of product loaded out using lime kiln dust loadout shall not exceed 240 tons per 3-hr period.
 - i. The owner or operator shall maintain records of the amount of product loaded out every 3-hours, in tons.
 - B. The owner or operator shall begin monitoring the differential pressure drop across the baghouse, as specified in condition 5.C. by May 1, 2018.
 - i. The owner or operator shall maintain a record of the commencement date of the differential pressure drop monitoring of the control equipment.
 - C. The differential pressure drop across Baghouse (CE LP-7) shall be maintained between 2 and 10 inches of water column, based on 1-hr block average.
 - i. The owner or operator shall properly operate and maintain equipment to monitor differential pressure drop across Baghouse (CE LP-7). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
 - ii. The owner or operator shall collect and record the pressure drop across Baghouse (CE LP-7), in inches of water, at a minimum of once every 2 minutes. Calculate and record the hourly average for all readings for each 1-hour block. If the average hourly pressure drop across Baghouse (CE LP-7) falls outside the range specified in Condition 5.C., the owner or operator shall investigate Baghouse (CE LP-7) and make corrections to the baghouse. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Baghouse (CE LP-7) are not in operation.
 - D. The owner or operator shall develop an operating and maintenance plan for the Baghouse (CE LP-7), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Baghouse (CE LP-7).
-

6. Continuous Emission Monitoring Systems (CEMS)

Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)"f").

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
 - (2) This current amendment becomes void.
-

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

- (1) Per 567 IAC 22.3(3)"b":
 - (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
 - (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
- (2) Per 567 IAC 22.3(3)"f," when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - (b) At least seven (7) days before equipment relocation.
- (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
- (4) Unless specified per a federal regulation, the owner or the owner's authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:

- (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
- (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.
- (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
- (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.
- (5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 725-9549
Fax: (515) 725-9502

Field Office 6
1023 West Madison
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Permit No.	Project No.	Description	Date	Stack Testing
88-A-220	87-151	Original Permit.	12/29/88	No
88-A-220-S1	97-191	Revised PM ₁₀ Emission Limit for SIP.	6/6/97	Yes
88-A-220-S2	97-478	Changed the Fan Flowrate on Baghouse.	2/16/98	Yes
88-A-220-S3	06-132	Decrease Stack Height due to Partial Tank Collapse and Remove NSPS Subpart OOO Requirements.	7/14/06	No
88-A-220-S4	15-175	Replace baghouse; replace kiln dust tank lid.	06/18/15	Yes

END OF PERMIT



Air Quality Construction Permit

Permit Number: 88-A-221-S10

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

563-324-1931
dosland@linwoodmining.com

401 E Front Street
Davenport, IA 52761

Permitted Equipment

Emission Point ID: LP-8

Emission Unit(s) and Control Equipment:

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
Multiple*	#4 Lime Truck Loadout System	90 tons per hour	Baghouse (CE LP-8)

*See Emission Unit list in Condition 3

Equipment Location: 401 E Front Street
Davenport, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Project Number	Project Description	Stack Testing	Issuance Date
19-130	Correct exhaust flowrate based on recent stack test	No	07/02/19

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

Pollutant	lb/hr ¹	tons/yr ²	Other Limits	Reference/Basis
Particulate Matter (PM) – State	1.0 ⁵	NA	0.1 gr/dscf	567 IAC 23.3(2)"a"
PM ₁₀	0.94 ⁶	NA	NA	NA
PM _{2.5}	NA	NA	NA	NA
Opacity	NA	NA	40% ^{3, 4}	567 IAC 23.3(2)"d"

¹ The emission limit is expressed as the average of three (3) runs.

² The emission limit is based on a twelve (12) month rolling total.

³ The emission limit is based on a six (6) minute average.

⁴ An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁵ PM emissions limit was requested by the permittee to restrict PTE.

⁶ The PM₁₀ limit established for attainment and maintenance of PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the state implementation plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

2. Compliance Demonstration(s)

Compliance Demonstration Table

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

If an initial stack test is specified in the "Compliance Demonstration Table," the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in "Compliance Demonstration Table," the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the "Compliance Demonstration Table." See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner's authorized agent shall use the test method and run time listed in the "Compliance Demonstration Table" unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)"a", at the Department's request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later

2. Compliance Demonstration(s) (Continued)

than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the

Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height (feet from the ground)	105
Discharge Style	Vertical Unobstructed
Stack Outlet Dimensions (inches)	22
Exhaust Temperature (°F)	100
Exhaust Flowrate (scfm)	10,000

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

The following emission units exhaust through this emission point:

Emission Unit	Maximum Capacity
Tank 445 (LP-8a)	500 tons of Lime
Tank 446 (LP-8b)	500 tons of Lime
Tank 447 (LP-8c)	500 tons of Lime
Crusher (LP-8d)	50 tons of Lime /hour
Screen (LP-8e)	50 tons of Lime /hour
Briquetter (LP-8f)	5 tons of Lime /hour
Pneumatic Blower System (LP-8g)	25 tons of Lime /hour
Tank 441 (LP-8h)	500 tons of Lime
Scale #1 Loadout System (LP-8i)	90 tons of Lime per hour
Tank 446B (LP-8j)	200 tons of Lime

4. Federal Standards

A. New Source Performance Standards (NSPS):

This emission unit is not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

This emission unit is not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The maximum amount of lime loaded out using the truck loadout system shall not exceed 90 tons per hour averaged over 3-hr period.
 - i. For each hour, the owner or operator shall maintain records of the amount of product loaded out in tons.
 - ii. The owner or operator shall maintain records of the 3-hour average of product loaded out in tons.
 - B. The stack shall be raised to 105 feet from the ground within 90 days of permit issuance.
 - i. The owner or operator shall maintain a record of the completion date that stack EP LP-8 was increased to 105 feet from the ground.
 - C. The owner or operator shall begin monitoring the differential pressure drop across the baghouse, as specified in condition 5.D. by May 1, 2018.
 - i. The owner or operator shall maintain a record of the commencement date of the differential pressure drop monitoring of the control equipment.
 - D. The differential pressure drop across Baghouse (CE LP-8) shall be maintained between 2 and 10 inches of water column, based on 1-hr block average.
 - i. The owner or operator shall properly operate and maintain equipment to monitor differential pressure drop across Baghouse (CE LP-8). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
 - ii. The owner or operator shall collect and record the pressure drop across Baghouse (CE LP-8), in inches of water, at a minimum of once every 2 minutes. Calculate and record the hourly average for all readings for each 1-hour block. If the average hourly pressure drop across Baghouse (CE LP-8) falls outside the range specified in Condition 5.D., the owner or operator shall investigate Baghouse (CE LP-8) and make corrections to the baghouse. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Baghouse (CE LP-8) are not in operation.
 - E. The owner or operator shall develop an operating and maintenance plan for the Baghouse (CE LP-8), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Baghouse (CE LP-8).
-

6. Continuous Emission Monitoring Systems (CEMS)

Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)"f").

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
- (2) This current amendment becomes void.

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. *Cleaning of control equipment*, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

- (1) Per 567 IAC 22.3(3)"b":
 - (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
 - (b) *The actual date of startup, postmarked within fifteen (15) days following the start of operation.*
- (2) Per 567 IAC 22.3(3)"f," when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - (b) At least seven (7) days before equipment relocation.
- (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
- (4) Unless specified per a federal regulation, the owner or the owner's authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

- B. The owner or operator shall furnish the Department with the following reports:
- (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.
 - (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
 - (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)
- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau Iowa Department of Natural Resources 502 E. 9 th St. Des Moines, IA 50319 Telephone: (515) 725-8200 Fax: (515) 725-9501	Field Office 6 1023 West Madison Washington, IA 52353 Telephone: (319) 653-2135 Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Permit No.	Project No.	Description	Date	Stack Testing
88-A-221	87-151	Original Permit	12/29/88	No
88-A-221-S1	97-191	Revised PM10 Allowable for SIP	06/06/97	Yes
88-A-221-S2	97-478	Amended Fan Flowrate	02/16/98	Yes
88-A-221-S3	00-622	Listed All Emission Units in System	06/20/02	Yes
88-A-221-S4	02-231	Amended Stack Characteristics	09/24/03	No
88-A-221-S5	01-220	Amend NSPS Conversion in Condition 10	12/09/03	No
88-A-221-S6	06-204	Removed Reference to NSPS Subpart OOO	05/01/06	No
88-A-221-S7	10-063	Update Stack Characteristics	04/15/10	No
88-A-221-S8	10-401	Add Emission Unit	10/26/10	No
88-A-221-S9	17-118	Amend equipment list and increase stack height for modeling	03/13/18	Yes

END OF PERMIT



Air Quality Construction Permit

Permit Number: 97-A-1084-S4

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

563-324-1931
dosland@linwoodmining.com

401 E Front Street
Davenport, IA 52761

Permitted Equipment

Emission Point ID: LP-12

Emission Unit(s) and Control Equipment:

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
LP-12	Ingredients Bin*	100 Tons of ingredients per hour	Baghouse (CE LP-12)

*See Emission Unit list in Condition 3

Equipment Location: 401 E Front Street
Davenport, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Project Number	Project Description	Stack Testing	Issuance Date
18-366	Add emission units from LP-3; modify stack characteristics	No	03/14/19

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

Pollutant	lb/hr ¹	tons/yr ²	Other Limits	Reference/Basis
Particulate Matter (PM) – State	0.57 ⁵	NA	0.1 gr/dscf	567 IAC 23.3(2)"a"
PM ₁₀	0.05 ⁶	NA	NA	NA
PM _{2.5}	NA	NA	NA	NA
Opacity	NA	NA	40% ^{3,4}	567 IAC 23.3(2)"d"

¹ The emission limit is expressed as the average of three (3) runs.

² The emission limit is based on a twelve (12) month rolling total.

³ The emission limit is based on a six (6) minute average.

⁴ An exceedance of the indicator opacity of No Visible Emissions will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁵ PM emissions limit was added to restrict PTE.

⁶ The PM₁₀ limit established for attainment and maintenance of PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the state implementation plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

2. Compliance Demonstration(s)

Compliance Demonstration Table

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

If an initial stack test is specified in the "Compliance Demonstration Table," the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in "Compliance Demonstration Table," the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the "Compliance Demonstration Table." See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner's authorized agent shall use the test method and run time listed in the "Compliance Demonstration Table" unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

2. Compliance Demonstration(s) (Continued)

Per 567 IAC 25.1(7)"a", at the Department's request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height (feet from the ground)	65
Discharge Style	Vertical Unobstructed
Stack Outlet Dimensions (inches)	12
Exhaust Temperature (°F)	Ambient
Exhaust Flowrate (scfm)	3,600

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

The following emission units exhaust through this emission point:

Emission Unit	Maximum Capacity	Control Equipment
Hi-Cal Storage Bin (LP-12a)	165 tons of ingredient	Baghouse (CE LP-12)
Pneumatic Blowers (LP-12b)	75 tons of ingredient per hour	
Hi-Cal Storage Bin (LP-12c)	50 tons of ingredient	
Flourspar Storage Bin (LP-12e)	50 tons of ingredient	
Cal-Aluminate Storage Bin (LP-12f)	75 tons of ingredient	
Hi-Cal Storage Bin (LP-12g)	75 tons of ingredient	
Bagging Tank Conveyor (LP-3a)	75 tons of ingredient per hour	
2-ton Bagger (LP-3b)	20 tons of ingredient per hour	

4. Federal Standards

A. New Source Performance Standards (NSPS):

This emission unit is not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

This emission unit is not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The maximum amount of product conveyed to bagging shall not exceed 100 tons per hour averaged over 3-hr period.
 - i. For each hour, the owner or operator shall maintain records of the amount of product loaded out in tons.
 - ii. The owner or operator shall maintain records of the 3-hour average the amount of product loaded out in tons.
- B. The owner or operator shall decommission loadout LP-3 and rescind permit #71-A-085-S2 by June 30, 2019.
 - i. The owner or operator shall maintain a record of the date when EP LP-3 was decommissioned from use.
- C. The differential pressure drop across Baghouse (CE LP-12) shall be maintained between 2 and 10 inches of water column, based on 1-hr block average.
 - i. The owner or operator shall properly operate and maintain equipment to monitor differential pressure drop across Baghouse (CE LP-12). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
 - ii. The owner or operator shall collect and record the pressure drop across Baghouse (CE LP-12), in inches of water, at a minimum of once every 2 minutes. Calculate and record the hourly average for all readings for each 1-hour block. If the average hourly pressure drop across Baghouse (CE LP-12) falls outside the range specified in Condition 5.C., the owner or operator shall investigate Baghouse (CE LP-12) and make corrections to the baghouse. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Baghouse (CE LP-12) are not in operation.
- D. The owner or operator shall develop an operating and maintenance plan for the Baghouse (CE LP-12), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Baghouse (CE LP-12).

6. Continuous Emission Monitoring Systems (CEMS)

Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
 - (2) This current amendment becomes void.
-

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment,

which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

- (1) Per 567 IAC 22.3(3)“b”:
 - (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
 - (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
- (2) Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - (b) At least seven (7) days before equipment relocation.
- (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
- (4) Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:

- (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
- (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.
- (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
- (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.
- (5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be

available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau Iowa Department of Natural Resources 502 E. 9 th St. Des Moines, IA 50319 Telephone: (515) 725-8200 Fax: (515) 725-9501	Field Office 6 1023 West Madison Washington, IA 52353 Telephone: (319) 653-2135 Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Permit No.	Project No.	Description	Date	Stack Testing
97-A-1084	97-686	Original permit.	2/16/98	Yes
97-A-1084-S1	03-139	Vented additional EUs through stack.	9/24/03	Yes
97-A-1084-S2	04-045	Modify exhaust flow rate	1/29/04	No
97-A-1084-S3	15-457	Amend permit to allow baghouse replacement	03/13/18	Yes

END OF PERMIT



Air Quality Construction Permit

Permit Number: 02-A-028-S6

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

563-324-1931
dosland@linwoodmining.com

401 E Front Street
Davenport, IA 52761

Permitted Equipment

Emission Point ID: LP-13

Emission Unit(s) and Control Equipment:

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
Multiple*	Lime Rail Loadout System	100 TPH	Baghouse (CE LP-13)

*See Emission Unit list in Condition 3

Equipment Location: 401 E Front Street
Davenport, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Project Number	Project Description	Stack Testing	Issuance Date
17-118	Add dolo loadout equipments to the loadout	No	03/13/18

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

Pollutant	lb/hr ¹	tons/yr ²	Other Limits	Reference/Basis
Particulate Matter (PM) – State	0.31 ⁵	NA	0.1 gr/dscf	567 IAC 23.3(2)"a"
PM ₁₀	0.17 ⁶	NA	NA	NA
PM _{2.5}	NA	NA	NA	NA
Opacity	NA	NA	40% ^{3, 4}	567 IAC 23.3(2)"d"

¹ The emission limit is expressed as the average of three (3) runs.

² The emission limit is based on a twelve (12) month rolling total.

³ The emission limit is based on a six (6) minute average.

⁴ An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁵ PM emissions limit was requested by the permittee to restrict PTE.

⁶ The PM₁₀ limit established for attainment and maintenance of PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the state implementation plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

2. Compliance Demonstration(s)

Compliance Demonstration Table

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

If an initial stack test is specified in the "Compliance Demonstration Table," the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in "Compliance Demonstration Table," the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the "Compliance Demonstration Table." See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner's authorized agent shall use the test method and run time listed in the "Compliance Demonstration Table" unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

2. Compliance Demonstration(s) (Continued)

Per 567 IAC 25.1(7)"a", at the Department's request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height (feet from the ground)	50
Discharge Style	Vertical Unobstructed
Stack Outlet Dimensions (inches)	10
Exhaust Temperature (°F)	100
Exhaust Flowrate (scfm)	1,800

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

The following emission units exhaust through this emission point:

Emission Unit	Maximum Capacity	Control Equipment
Lime Rail Loadout System (LP-13) (Spout and belt#1)	100 Tons of Lime Per Hour	Baghouse (LP-13)
Lime Rail Loading Conveyor (LP-13A)	100 Tons of Lime Per Hour	
Tank 445 Rail Conveyor (LP-13B)	100 Tons of Lime Per Hour	
Tank 446 Rail Conveyor (LP-13C)	100 Tons of Lime Per Hour	
Tank 446 Rail Conveyor (LP-13D)	100 Tons of Lime Per Hour	
Dolo to Rail Loadout Conveyor (LP-13E)	100 Tons of Lime Per Hour	

4. Federal Standards

A. New Source Performance Standards (NSPS):

This emission unit is not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

At this time, the plant is an area source for hazardous air pollutants, and so is not currently subject to the requirements of Subpart AAAAA, National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The maximum amount of lime loaded out using the rail loadout system shall not exceed 100 tons per hour averaged over 3-hr period.
 - i. For each hour, the owner or operator shall maintain records of the amount of product loaded out in tons.
 - ii. The owner or operator shall maintain records of the 3-hour average of product loaded out in tons.
 - B. The stack shall be raised to 50 feet from the ground within 90 days after permit issuance.
 - i. The owner or operator shall maintain a record of the completion date that stack EP LP-13 was raised to 50 feet from the ground.
 - C. The owner or operator shall begin monitoring the differential pressure drop across the baghouse, as specified in condition 5.D. by May 1, 2018.
 - i. The owner or operator shall maintain a record of the commencement date of the differential pressure drop monitoring of the control equipment.
 - D. The differential pressure drop across Baghouse (CE LP-13) shall be maintained between 2 and 10 inches of water column, based on 1-hr block average.
 - i. The owner or operator shall properly operate and maintain equipment to monitor differential pressure drop across Baghouse (CE LP-13). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
 - ii. The owner or operator shall collect and record the pressure drop across Baghouse (CE LP-13), in inches of water, at a minimum of once every 2 minutes. Calculate and record the hourly average for all readings for each 1-hour block. If the average hourly pressure drop across Baghouse (CE LP-13) falls outside the range specified in Condition 5.D., the owner or operator shall investigate Baghouse (CE LP-13) and make corrections to the baghouse. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Baghouse (CE LP-13) are not in operation.
 - E. The owner or operator shall develop an operating and maintenance plan for the Baghouse (CE LP-13), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Baghouse (CE LP-13).
 - F. The owner or operator shall complete the modification of EP LP-13 to add the Dolo to Rail Loadout Conveyor (LP-13E) by May 31, 2018.
 - i. The owner or operator shall maintain a record of the completion date that the Dolo to Rail Loadout Conveyor (LP-13E) was added to EP LP-13.
-

6. Continuous Emission Monitoring Systems (CEMS)

Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)"P").

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or

- (2) This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
 - (2) This current amendment becomes void.
-

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

- A. The owner or operator shall furnish the Department the following written notifications:

- (1) Per 567 IAC 22.3(3)"b":
 - (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
 - (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
- (2) Per 567 IAC 22.3(3)"f," when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - (b) At least seven (7) days before equipment relocation.
- (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
- (4) Unless specified per a federal regulation, the owner or the owner's authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:

- (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
- (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.
- (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
- (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.
- (5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 725-9549 Fax: (515) 725-9502	Field Office 6 1023 West Madison Washington, IA 52353 Telephone: (319) 653-2135 Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Permit No.	Project No.	Description	Date	Stack Testing
02-A-028	01-147	Original Permit	01/11/02	Yes
02-A-028-S1	02-080	Amended Stack Characteristics	06/20/02	Yes
02-A-028-S2	03-183	Added Emission Unit	09/24/03	Yes
02-A-028-S3	06-204	Removed Reference to NSPS Subpart OOO	05/01/06	Yes
02-A-028-S4	10-401	Add Emission Unit	10/26/10	Yes

END OF PERMIT



Air Quality Construction Permit

Permit Number: 11-A-335-S3

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

563-324-1931
dosland@linwoodmining.com

401 E Front Street
Davenport, IA 52761

Permitted Equipment

Emission Point ID: LP-16

Emission Unit(s) and Control Equipment:

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
Multiple*	Dolo Processing System	90,000 lbs per hour of dolomite	Baghouse (CE LP-16)

*See Emission Unit list in Condition 3

Equipment Location: 401 E Front Street
Davenport, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Project Number	Project Description	Stack Testing	Issuance Date
18-366	Increase PM10 permit limit	No	03/14/19

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

Pollutant	lb/hr ¹	tons/yr ²	Other Limits	Reference/Basis
Particulate Matter (PM) – State	0.82 ⁵	NA	0.1 gr/dscf	567 IAC 23.3(2)"a"
PM ₁₀	0.82 ⁶	NA	NA	NAAQS
PM _{2.5}	NA	NA	NA	NA
Opacity	NA	NA	40% ^{3, 4}	567 IAC 23.3(2)"d"

¹ The emission limit is expressed as the average of three (3) runs.

² The emission limit is based on a twelve (12) month rolling total.

³ The emission limit is based on a six (6) minute average.

⁴ An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁵ PM emissions limit was added to restrict PTE.

⁶ The PM₁₀ limit established for attainment and maintenance of PM10 National Ambient Air Quality Standards (NAAQS) as approved into the state implementation plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

2. Compliance Demonstration(s)

Compliance Demonstration Table

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

If an initial stack test is specified in the "Compliance Demonstration Table," the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in "Compliance Demonstration Table," the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the "Compliance Demonstration Table." See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner's authorized agent shall use the test method and run time listed in the "Compliance Demonstration Table" unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

2. Compliance Demonstration(s) (Continued)

Per 567 IAC 25.1(7)"a", at the Department's request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height (feet from the ground)	60
Discharge Style	Vertical Unobstructed
Stack Outlet Dimensions (inches)	24
Exhaust Temperature (°F)	90
Exhaust Flowrate (scfm)	9,000

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

The following emission units exhaust through this emission point:

Emission Unit	Maximum Capacity	Control Equipment
Dolo Process Loading Spout (LP-6)	40 Tons per hour of lime	Baghouse (CE LP-16)
Dolo Process Bins (LP-16B) (5 bins combined)	400 Tons of lime	
Dolo Process Conveying (LP-16C) (15 conveyors/screws/elevators)	45 Tons per hour of lime	
Dolo Process Screener and Crusher (LP-16S) (screener, Briquetter and crusher)	45 Tons per hour of lime	

4. Federal Standards

A. New Source Performance Standards (NSPS):

This emission unit is not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

At this time, the plant is an area source for hazardous air pollutants, and so is not currently subject to the requirements of Subpart AAAAA, National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The maximum production rate of dolo processing system shall not exceed 90,000 pounds per hour averaged over 6-hr period.
 - i. For each hour, the owner or operator shall maintain records of the amount of product loaded, using the belt scale, in pounds.
 - ii. The owner or operator shall maintain records of the 6-hour average of product loaded, using the belt scale, in pounds.
 - B. The owner or operator shall begin monitoring the differential pressure drop across the baghouse, as specified in condition 5.C. by May 1, 2018.
 - i. The owner or operator shall maintain a record of the commencement date of the differential pressure drop monitoring of the control equipment.
 - C. The differential pressure drop across Baghouse (CE LP-16) shall be maintained between 2 and 10 inches of water column, based on 1-hr block average.
 - i. The owner or operator shall properly operate and maintain equipment to monitor differential pressure drop across Baghouse (CE LP-16). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
 - ii. The owner or operator shall collect and record the pressure drop across Baghouse (CE LP-16), in inches of water, at a minimum of once every 2 minutes. Calculate and record the hourly average for all readings for each 1-hour block. If the average hourly pressure drop across Baghouse (CE LP-16) falls outside the range specified in Condition 5.C., the owner or operator shall investigate Baghouse (CE LP-16) and make corrections to the baghouse. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Baghouse (CE LP-16) are not in operation.
 - D. The owner or operator shall develop an operating and maintenance plan for the Baghouse (CE LP-16), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Baghouse (CE LP-16).
 - E. The owner or operator shall rescind permit #88-A-219-S4 (LP 6) within 30 days of issuance of this permit.
-

6. Continuous Emission Monitoring Systems (CEMS)

Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“P”).

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
- (2) This current amendment becomes void.

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

- (1) Per 567 IAC 22.3(3)"b":
 - (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
 - (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
- (2) Per 567 IAC 22.3(3)"f," when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - (b) At least seven (7) days before equipment relocation.
- (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
- (4) Unless specified per a federal regulation, the owner or the owner's authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

- B. The owner or operator shall furnish the Department with the following reports:
- (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.
 - (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
 - (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)
- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
502 E. 9th St.
Des Moines, IA 50319
Telephone: (515) 725-8200
Fax: (515) 725-9501

Field Office 6
1023 West Madison
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Permit No.	Project No.	Description	Date	Stack Testing
11-A-335	10-602	Permit existing units from 78-A-321-S4 and new units	06/16/11	Yes
11-A-335-S1	12-226	Decrease permitted flow rate; decrease production rate	07/30/14	No
11-A-335-S2	17-118	Amend capacity, add emission units, reduce PM ₁₀ emission rate	03/13/18	Yes

END OF PERMIT



Air Quality Construction Permit

Permit Number: 11-A-336-S3

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

563-324-1931
dosland@linwoodmining.com

401 E Front Street
Davenport, IA 52761

Permitted Equipment

Emission Point ID: LP-17

Emission Unit(s) and Control Equipment:

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
Multiple*	Dolo – storage and truck loadout	100 tons of dolomite per hour	Baghouse (CE LP-17)

*See Emission Unit list in Condition 3

Equipment Location: 401 E Front Street
Davenport, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Project Number	Project Description	Stack Testing	Issuance Date
18-366	Remove PM test requirement from the permit; PM10 already done in 2018	No	03/14/19

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

Pollutant	lb/hr ¹	tons/yr ²	Other Limits	Reference/Basis
Particulate Matter (PM) – State	1.0 ⁵	NA	0.1 gr/dscf	567 IAC 23.3(2)"a"
PM ₁₀	0.94 ⁶	NA	NA	NA
PM _{2.5}	NA	NA	NA	NA
Opacity	NA	NA	40% ^{3,4}	567 IAC 23.3(2)"d"

¹ The emission limit is expressed as the average of three (3) runs.

² The emission limit is based on a twelve (12) month rolling total.

³ The emission limit is based on a six (6) minute average.

⁴ An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁵ PM emissions limit was added to restrict PTE.

⁶ The PM₁₀ limit established for attainment and maintenance of PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the state implementation plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

2. Compliance Demonstration(s)

Compliance Demonstration Table

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

If an initial stack test is specified in the "Compliance Demonstration Table," the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in "Compliance Demonstration Table," the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the "Compliance Demonstration Table." See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner's authorized agent shall use the test method and run time listed in the "Compliance Demonstration Table" unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)"a", at the Department's request, a pretest meeting shall be held not later than fifteen (15) days before the

owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height (feet from the ground)	90
Discharge Style	Vertical Unobstructed
Stack Outlet Dimensions (inches)	36
Exhaust Temperature (°F)	200
Exhaust Flowrate (scfm)	6,400

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

The following emission units exhaust through this emission point:

Emission Unit	Maximum Capacity	Control Equipment
Dolo Truck Loading Spout (LP-17)	100 tons per hour of dolomite	Baghouse (CE-17)
Dolo Loadout Conveyor #1 (LP-17-1) (Rail & Truck)	100 tons per hour of dolomite	
Dolo Loadout Conveyor #2 (LP-17-2)	100 tons per hour of dolomite	
Bathtub Bins (5 total) (LP-17-4)	80 tons each bin	
C352 Dolo Belt to Loadout (EU LP-1Q)	50 tons per hour of dolomite	
C353 Dolo Drag Conveyor (EU LP-1R)	50 tons per hour of dolomite	

4. Federal Standards

A. New Source Performance Standards (NSPS):

This emission unit is not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

At this time, the plant is an area source for hazardous air pollutants, and so is not currently subject to the requirements of Subpart AAAAA, National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The maximum amount of dolo loaded out using the dolo loadout system shall not exceed 100 tons per hour averaged over 6-hr period.
 - i. For each hour, the owner or operator shall maintain records of the amount of product loaded out in tons.
 - ii. The owner or operator shall maintain records of the 6-hour average of product loaded out in tons.
- B. The owner or operator shall begin monitoring the differential pressure drop across the baghouse, as specified in condition 5.C. by May 1, 2018.
 - i. The owner or operator shall maintain a record of the commencement date of the differential pressure drop monitoring of the control equipment.
- C. The differential pressure drop across Baghouse (CE LP-17) shall be maintained between 2 and 10 inches of water column, based on 1-hr block average.
 - i. The owner or operator shall properly operate and maintain equipment to monitor differential pressure drop across Baghouse (CE LP-17). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
 - ii. The owner or operator shall collect and record the pressure drop across Baghouse (CE LP-17), in inches of water, at a minimum of once every 2 minutes. Calculate and record the hourly average for all readings for each 1-hour block. If the average hourly pressure drop across Baghouse (CE LP-17) falls outside the range specified in Condition 5.C., the owner or operator shall investigate Baghouse (CE LP-17) and make corrections to the baghouse. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Baghouse (CE LP-17) are not in operation.
- D. The owner or operator shall develop an operating and maintenance plan for the Baghouse (CE LP-17), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Baghouse (CE LP-17).
- E. The owner or operator shall decommission loadout EP LP-17B (Bathtub) by May 1, 2018.
 - i. The owner or operator shall maintain a record of the date when EP LP-17B was decommissioned from use.

6. Continuous Emission Monitoring Systems (CEMS)

Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
 - (2) This current amendment becomes void.
-

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

- (1) Per 567 IAC 22.3(3)"b":
 - (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
 - (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
- (2) Per 567 IAC 22.3(3)"f," when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - (b) At least seven (7) days before equipment relocation.
- (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
- (4) Unless specified per a federal regulation, the owner or the owner's authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:

- (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
- (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be

submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.

- (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
- (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.
- (5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
502 E. 9th St.
Des Moines, IA 50319
Telephone: (515) 725-8200
Fax: (515) 725-9501

Field Office 6
1023 West Madison
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Permit No.	Project No.	Description	Date	Stack Testing
11-A-336	10-602	Permit existing units from 78-A-321-S4 and new units	06/16/11	Yes
11-A-336-S1	12-226	Increase permitted flow rate; decrease production rate	07/30/14	No
11-A-336-S2	17-118	Amend equipment list to add as-built units	03/13/18	Yes

END OF PERMIT



Air Quality Construction Permit

Permit Number: 17-A-504-S2

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:

Darin Osland
Environmental Manager

Responsible Party:

Same

(563) 324-1391, Ext. 1140

dosland@linwoodmining.com

401 E Front St
Davenport, IA 52804

Permitted Equipment

Emission Point ID: EP Solid Fuel-01

Table 1 – Emission Unit(s) and Control Equipment

EU ID	Description	Operating Capacity	Control Equipment Description and ID
EU Solid Fuel-01	Solid Fuel Pile	25,000 tons/year	Hoop Building (83% Enclosure) (CE Solid Fuel-01)

Equipment Location: 401 E Front Street
Davenport, Iowa 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Table 2 – Project Issuance Information

Project Number	Project Description	Stack Testing	Issuance Date
25-225	Reduce Annual Ton-per-Year Throughput and Modify Emission Limits	No	12/10/2025

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

Table 3 – Emission Limits

Pollutant	lb/day	Other Limits	Reference/Basis
Particulate Matter (PM) – State	0.010 ¹	NA	NA
PM ₁₀	0.003 ^{1,2}	NA	NAAQS
PM _{2.5}	0.001 ¹	NA	NA
Opacity	NA	See Footnote 3	567 IAC 23.3(2)“c”

¹ Established in Project Number 25-225, per facility’s request, to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability.

² Established in Project Number 25-225 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

³ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property.

2. Compliance Demonstration(s)

If an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

Table 4 - Compliance Demonstrations

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	Recordkeeping	See Footnote 1	NA	NA
	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M Method 202
PM ₁₀	Recordkeeping	See Footnote 1	NA	NA
	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
PM _{2.5}	Recordkeeping	See Footnote 1	NA	NA
	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

¹ See Permit Condition 5 for the required recordkeeping requirements.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 21.10(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department for review no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed in the table below.

Table 5 – Emission Point Parameters

Parameter	Value
Stack Height (feet from the ground)	*
Discharge Style	*
Stack Outlet Dimensions (inches)	*
Exhaust Temperature (°F)	*
Exhaust Flowrate (scfm)	*

**The solid fuel pile is located inside a building enclosure that has, at a minimum, three sides.*

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

- (1) The facility (Plant No. 82-01-015) is not affected by the Title 40 of the Code of Federal Regulations (CFR), Part 60, Subpart Y (*Standards of Performance for Coal Preparation and Processing Plants*), because it does not process more than 200 tons of coal per day.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (1) The solid fuel pile covered by this permit is not an affected emission unit under the federal standards for emission of hazardous air pollutants for source categories, as defined in 40 CFR Part 63, because there are no applicable categories at this time.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by this permit shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

A. The owner or operator shall operate the solid fuel pile covered by this permit as follows:

- (1) The maximum amount of solid fuel stored in the solid fuel pile covered by this permit shall not exceed 25,000 tons per 12-month rolling period.
 - a. The owner or operator shall collect and record the total solid fuel, in tons, stored in the solid fuel pile covered by this permit on a monthly basis.
 - b. The owner or operator shall calculate and record the total solid fuel, in tons, stored in the solid fuel pile covered by this permit on a rolling 12-month basis.
- (2) Whenever the solid fuel pile covered by this permit is operating, the owner or operator shall take reasonable precautions to prevent the discharge beyond the lot line of the property. Reasonable precautions include, but are not limited to:
 - a. The installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials.
 - b. The use, where practical, of water or chemicals for control of dusts.
- (3) The owner or operator shall maintain the solid fuel pile covered by this permit inside a building enclosure that has, at a minimum, three sides, to utilize 83 percent reduction of particulate emission generated by the operation of the solid fuel pile.
 - a. The owner or operator shall develop an operating and maintenance plan for the building enclosure, including periodic inspections and a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - b. The owner or operator shall maintain a record of all inspections and maintenance activities and any action resulting from the inspection and maintenance of the building enclosure.
 - c. The owner or operator shall conduct visible emissions observations, once per calendar day, on the building where the solid fuel pile covered by this permit is located. This requirement shall not apply on the days that the solid fuel pile covered by this permit is not in use.
 - i. The owner or operator shall record the date and time of the observation and the presence or absence of visible emission.
 - ii. If visible emissions are observed, the owner or operator shall investigate the emission unit or control equipment and make corrections to the associated operations or equipment.
 - iii. The owner or operator shall maintain a record of all corrective actions taken.

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in this permit, any control equipment covered by this permit shall operate at all times when the emission unit(s) covered by this permit are in operation.

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
- (2) This current amendment becomes void.

11. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

- A. The owner or operator shall furnish the Department the following written notifications:
- (1) In accordance with 567 IAC 22.3(3)“b”, dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)“b” shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)“b”.
 - (2) In accordance with 567 IAC 22.3(3)“f”, when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
 - (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
 - (4) Unless specified, in accordance with a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.
- If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.
- B. The owner or operator shall furnish the Department with the following reports:
- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.
 - (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.
 - (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).

- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Table 6 – Permit History

Project No.	Permit No.	Description	Stack Testing	Issuance Date
17-118	17-A-504	Issue Permit to Grandfathered Solid Fuel Pile to Establish PM ₁₀ Emission Limits	No	03/13/2018
18-366	17-A-504-S1	Increase Annual Ton-per-Year Throughput	No	03/14/2019

END OF PERMIT



Air Quality Construction Permit

Permit Number: 17-A-495-S1

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

563-324-1931
dosland@linwoodmining.com

401 E Front Street
Davenport, IA 52761

Permitted Equipment

Emission Point ID: LP-20

Emission Unit(s) and Control Equipment:

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
LP-20	Solid Fuel Hopper	70 TPH of Solid Fuel; 300 Tons Per day of Solid Fuel; 61,000 TPY of Solid Fuel	None

Equipment Location: 401 E Front Street
Davenport, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Project Number	Project Description	Stack Testing	Issuance Date
18-366	Increase capacity to 300 TPD and 61,000 TPY	No	03/14/19

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

Pollutant	lb/hr ¹	tons/yr ²	Other Limits	Reference/Basis
Particulate Matter (PM) – State	0.04 ⁵	NA	0.1 gr/dscf	567 IAC 23.3(2)"a"
PM ₁₀	0.02 ⁶	NA	NA	NA
PM _{2.5}	NA	NA	NA	NA
Opacity	NA	NA	40% ^{3,4}	567 IAC 23.3(2)"d"

¹ The emission limit is expressed as the average of three (3) runs.

² The emission limit is based on a twelve (12) month rolling total.

³ The emission limit is based on a six (6) minute average.

⁴ An exceedance of the indicator opacity of No Visible Emissions will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁵ PM emissions limit was requested by the permittee to restrict PTE.

⁶ The PM₁₀ limit established for attainment and maintenance of PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the state implementation plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

2. Compliance Demonstration(s)

Compliance Demonstration Table

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

If an initial stack test is specified in the "Compliance Demonstration Table," the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in "Compliance Demonstration Table," the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the "Compliance Demonstration Table." See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner's authorized agent shall use the test method and run time listed in the "Compliance Demonstration Table" unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

2. Compliance Demonstration(s) (Continued)

Per 567 IAC 25.1(7)"a", at the Department's request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height (feet from the ground)	NA
Discharge Style	NA
Stack Outlet Dimensions (inches)	NA
Exhaust Temperature (°F)	NA
Exhaust Flowrate (scfm)	NA

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

The facility is of the source type subject to the New Source Performance Standard (NSPS), Subpart Y, Standards of Performance for Coal Preparation and Processing Plants. These units are not subject to the subpart as the facility does not process more than 200 tons of coal per day.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

At this time, the plant is an area source for hazardous air pollutants, and so is not currently subject to the requirements of Subpart AAAAA, National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The maximum amount of solid fuel transferred through the hopper shall not exceed 70 tons per hour
 - i. For each hour, the owner or operator shall maintain records of the amount of product transferred in tons.
 - ii. The owner or operator shall maintain hourly records of the product transferred in tons.
 - B. The maximum amount of solid fuel transferred through the hopper shall not exceed 300 tons per day.
 - i. For each day, the owner or operator shall maintain records of the amount of solid fuel transferred through the hopper in tons.
 - ii. The owner or operator shall maintain daily records of the solid fuel transferred in tons.
 - C. The owner or operator shall check for visible emissions from Solid Fuel Hopper (EP LP-20) once per day at a time while Solid Fuel Hopper (EP LP-20) is in operation. The owner or operator shall record the date and time of the observation and the presence or absence of visible emissions. If the owner or operator observes visible emissions from Solid Fuel Hopper (EP LP-20), the owner or operator shall investigate the emission unit or operations associated with the emission unit and make corrections to the associated operations or equipment. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Solid Fuel Hopper (EP LP-20) is not in operation.
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6. Continuous Emission Monitoring Systems (CEMS)

Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)"f").

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
 - (2) This current amendment becomes void.
-

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

- (1) Per 567 IAC 22.3(3)"b":
 - (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
 - (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
- (2) Per 567 IAC 22.3(3)"f," when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - (b) At least seven (7) days before equipment relocation.
- (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
- (4) Unless specified per a federal regulation, the owner or the owner's authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:

- (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
- (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.
- (3) ~~Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.~~
- (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.
- (5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau Iowa Department of Natural Resources 502 E. 9 th St. Des Moines, IA 50319 Telephone: (515) 725-8200 Fax: (515) 725-9501	Field Office 6 1023 West Madison Washington, IA 52353 Telephone: (319) 653-2135 Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Permit No.	Project No.	Description	Date	Stack Testing
17-A-495	17-118	Permit grandfathered equipment & Establish PM10 Limits	03/13/18	No

END OF PERMIT



Air Quality Construction Permit

Permit Number: 17-A-494-S1

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

563-324-1931
dosland@linwoodmining.com

401 E Front Street
Davenport, IA 52761

Permitted Equipment

Emission Point ID: LP-24

Emission Unit(s) and Control Equipment:

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
LP-21	Kilns Solid Fuel Conveyor	70 TPH; 300 Tons Per day of Solid Fuel	None
LP-25	Kilns Solid Fuel Tank	300 Tons Per day of Solid Fuel	None

Equipment Location: 401 E Front Street
Davenport, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Project Number	Project Description	Stack Testing	Issuance Date
18-366	Increase bin throughput	No	03/14/19

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

Pollutant	lb/hr ¹	tons/yr ²	Other Limits	Reference/Basis
Particulate Matter (PM) – State	0.20 ⁵	NA	0.1 gr/dscf	567 IAC 23.3(2)"a"
PM ₁₀	0.08 ⁶	NA	NA	NA
PM _{2.5}	NA	NA	NA	NA
Opacity	NA	NA	40% ^{3,4}	567 IAC 23.3(2)"d"

¹ The emission limit is expressed as the average of three (3) runs.

² The emission limit is based on a twelve (12) month rolling total.

³ The emission limit is based on a six (6) minute average.

⁴ An exceedance of the indicator opacity of No Visible Emissions will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁵ PM emissions limit was requested by the permittee to restrict PTE.

⁶ The PM₁₀ limit established for attainment and maintenance of PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the state implementation plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

2. Compliance Demonstration(s)

Compliance Demonstration Table

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

If an initial stack test is specified in the "Compliance Demonstration Table," the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in "Compliance Demonstration Table," the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the "Compliance Demonstration Table." See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner's authorized agent shall use the test method and run time listed in the "Compliance Demonstration Table" unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

2. Compliance Demonstration(s) (Continued)

Per 567 IAC 25.1(7)"a", at the Department's request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height (feet from the ground)	70
Discharge Style	Vertical Unobstructed
Stack Outlet Dimensions (inches)	32 by 32
Exhaust Temperature (°F)	Ambient
Exhaust Flowrate (scfm)	11.7

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

The facility is of the source type subject to the New Source Performance Standard (NSPS), Subpart Y, Standards of Performance for Coal Preparation and Processing Plants. These units are not subject to the subpart as the facility does not process more than 200 tons of coal per day.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

At this time, the plant is an area source for hazardous air pollutants, and so is not currently subject to the requirements of Subpart AAAAA, National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The maximum amount of solid fuel conveyed through the conveyor shall not exceed 70 tons per hour.
 - i. For each hour, the owner or operator shall maintain records of the amount of solid fuel conveyed through the conveyor in tons.
 - ii. The owner or operator shall maintain hourly records of the solid fuel conveyed in tons.
 - B. The maximum amount of solid fuel conveyed through the conveyor shall not exceed 300 tons per day. The maximum amount of solid fuel stored in the tank shall not exceed 300 tons per day.
 - i. For each day, the owner or operator shall maintain records of the amount of solid fuel conveyed through the conveyor in tons and stored in the tank in tons.
 - ii. The owner or operator shall maintain daily records of the solid fuel conveyed and stored in tons.
 - C. The owner or operator shall check for visible emissions from Solid Fuel Conveyor (EP LP-24) once per day at a time while Solid Fuel Conveyor (EP LP-24) is in operation. The owner or operator shall record the date and time of the observation and the presence or absence of visible emissions. If the owner or operator observes visible emissions from Solid Fuel Conveyor (EP LP-24), the owner or operator shall investigate the emission unit or operations associated with the emission unit and make corrections to the associated operations or equipment. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Solid Fuel Conveyor (EP LP-24) is not in operation.
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6. Continuous Emission Monitoring Systems (CEMS)

Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
- (2) This current amendment becomes void.

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

- (1) Per 567 IAC 22.3(3)"b":
 - (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
 - (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
- (2) Per 567 IAC 22.3(3)"f," when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - (b) At least seven (7) days before equipment relocation.
- (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
- (4) Unless specified per a federal regulation, the owner or the owner's authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:

- (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
- (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.
- (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
- (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.
- (5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau Iowa Department of Natural Resources 502 E. 9 th St. Des Moines, IA 50319 Telephone: (515) 725-8200 Fax: (515) 725-9501	Field Office 6 1023 West Madison Washington, IA 52353 Telephone: (319) 653-2135 Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Permit No.	Project No.	Description	Date	Stack Testing
17-A-494	17-118	Permit as-built equipment & Establish PM10 Limits	03/13/18	No

END OF PERMIT



Air Quality Construction Permit

Permit Number: 17-A-505-S2

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

563-324-1931
dosland@linwoodmining.com

401 E Front Street
Davenport, IA 52761

Permitted Equipment

Emission Point ID: LP-39

Emission Unit(s) and Control Equipment:

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
LP-39	Solid Fuel Crusher	Maximum design rate: 20 tons per hour Process design capacity: 11 tons per hour	Baghouse (CE LP-39)
LP-39A	Crusher Burner	7 MMBtu per hour	

Equipment Location: 401 E Front Street
Davenport, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Project Number	Project Description	Stack Testing	Issuance Date
19-130	Decrease exhaust flowrate and unit capacity based on stack test	No	07/02/19

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

Pollutant	lb/hr ¹	tons/yr ²	Other Limits	Reference/Basis
Particulate Matter (PM) – State	0.86 ⁵	NA	0.1 gr/dscf	567 IAC 23.4(7)
PM ₁₀	0.86 ⁶	NA	NA	NA
PM _{2.5}	NA	NA	NA	NA
Opacity	NA	NA	40% ^{3,4}	567 IAC 23.3(2)“d”
Sulfur Dioxide (SO ₂)	NA	NA	500 ppm	567 IAC 23.3(3)
Nitrogen Oxides (NO _x)	NA	NA	NA	NA
Volatile Organic Compounds (VOC)	NA	NA	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
Carbon dioxide (CO ₂)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

¹ The emission limit is expressed as the average of three (3) runs.

² The emission limit is based on a twelve (12) month rolling total.

³ The emission limit is based on a six (6) minute average.

⁴ An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁵ Emission rate established to limit the potential emissions under the Prevention of Significant Deterioration (PSD) significance thresholds.

⁶ The PM₁₀ limit established for attainment and maintenance of PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the state implementation plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

2. Compliance Demonstration(s)

Compliance Demonstration Table

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9
SO ₂	None	NA	1 hour	40 CFR 60, Appendix A, Method 6C
NO _x	None	NA	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	None	NA	1 hour	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18
CO	None	NA	1 hour	40 CFR 60, Appendix A, Method 10
Pb	None	NA	1 hour	40 CFR 60, Appendix A, Method 12
CO ₂	None	NA	1 hour	40 CFR 60, Appendix A, Method 3
HAP	None	NA	1 hour	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in "Compliance Demonstration Table," the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the "Compliance Demonstration Table." See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner's authorized agent shall use the test method and run time listed in the "Compliance Demonstration Table" unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)"a", at the Department's request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height (feet from the ground)	50
Discharge Style	Vertical Unobstructed
Stack Outlet Dimensions (inches)	21
Exhaust Temperature (°F)	175
Exhaust Flowrate (scfm)	6,500

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

The facility is of the source type subject to the New Source Performance Standard (NSPS), Subpart Y, Standards of Performance for Coal Preparation and Processing Plants. These units are not subject to the subpart as the facility does not process more than 200 tons of coal per day.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

This facility is of the source category for Subpart AAAAA (National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants; 40 CFR §63.7080 – 40 CFR §63.7143) of the National Emission Standards for Hazardous Air Pollutants (NESHAP). However, it is not subject as the facility has conducted testing per 40 CFR §63.7142 and it has been determined the facility is an area source.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The maximum amount of solid fuel crushed in the crusher shall not exceed 11 tons per hour averaged over 3-hr period.
 - i. For each hour, the owner or operator shall maintain records of the amount of solid fuel crushed in tons.
 - ii. The owner or operator shall maintain records of the 3-hour average of solid fuel crushed in tons.
- B. The burner shall be fueled by natural gas only.
 - i. The owner or operator shall maintain records of the type of fuel combusted in the burner.
- C. The facility shall not crush any other fuel besides coke/coal in the fuel crusher.
 - i. The owner or operator shall maintain records of the type of fuel crushed in the crusher.
- D. The owner or operator shall begin monitoring the differential pressure drop across the baghouse, as specified in condition 5.E. by May 1, 2018.
 - i. The owner or operator shall maintain a record of the commencement date of the differential pressure drop monitoring of the control equipment.
- E. The differential pressure drop across Baghouse (CE LP-39) shall be maintained between 2 and 10 inches of water column, based on 1-hr block average.
 - i. The owner or operator shall properly operate and maintain equipment to monitor differential pressure drop across Baghouse (CE LP-39). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
 - ii. The owner or operator shall collect and record the pressure drop across Baghouse (CE LP-39), in inches of water, at a minimum of once every 2 minutes. Calculate and record the hourly average for all readings for each 1-hour block. If the average hourly pressure drop across Baghouse (CE LP-39) falls outside the range specified in Condition 5.E., the owner or operator shall investigate Baghouse (CE LP-39) and make corrections to the baghouse. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Baghouse (CE LP-39) are not in operation.
- F. The owner or operator shall develop an operating and maintenance plan for the Baghouse (CE LP-39), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Baghouse (CE LP-39).

6. Continuous Emission Monitoring Systems (CEMS)

Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“P”).

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
- (2) This current amendment becomes void.

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

- (1) Per 567 IAC 22.3(3)“b”:
 - (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
 - (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
- (2) Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - (b) At least seven (7) days before equipment relocation.
- (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
- (4) Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:

- (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.

- (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.
 - (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
 - (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)
- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
502 E. 9th St.
Des Moines, IA 50319
Telephone: (515) 725-8200
Fax: (515) 725-9501

Field Office 6
1023 West Madison
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Permit No.	Project No.	Description	Date	Stack Testing
17-A-505	17-118	Replace 4 solid fuel crushers	03/13/18	Yes
17-A-505-S1	18-366	Increase crusher burner from 5 MMBtu/hr to 7 MMBtu/hr	03/14/19	No

END OF PERMIT



Air Quality Construction Permit

Permit Number: 17-A-491

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

563-324-1931
dosland@linwoodmining.com

401 E Front Street
Davenport, IA 52761

Permitted Equipment

Emission Point ID: LP-36

Emission Unit(s) and Control Equipment:

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
LP-36	Kiln # 3 Rockbox Conveyor	70 Tons of Limestone per hour	None
LP-37	Kiln # 3 Rockbox	70 Tons of Limestone per hour	None

Equipment Location: 401 E Front Street
Davenport, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Project Number	Project Description	Stack Testing	Issuance Date
15-457	Issue permit for the as-built units & Establish PM10 Limits	No	03/13/18

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

Pollutant	lb/hr ¹	tons/yr ²	Other Limits	Reference/Basis
Particulate Matter (PM) – State	0.21 ⁵	NA	0.1 gr/dscf	567 IAC 23.3(2)"a"
PM ₁₀	0.08 ⁶	NA	NA	NA
PM _{2.5}	NA	NA	NA	NA
Opacity	NA	NA	40% ^{3,4}	567 IAC 23.3(2)"d"

¹ The emission limit is expressed as the average of three (3) runs.

² The emission limit is based on a twelve (12) month rolling total.

³ The emission limit is based on a six (6) minute average.

⁴ An exceedance of the indicator opacity of No Visible Emissions will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁵ PM emissions limit was added to restrict PTE.

⁶ The PM₁₀ limit established for attainment and maintenance of PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the state implementation plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

2. Compliance Demonstration(s)

Compliance Demonstration Table

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

If an initial stack test is specified in the "Compliance Demonstration Table," the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in "Compliance Demonstration Table," the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the "Compliance Demonstration Table." See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner's authorized agent shall use the test method and run time listed in the "Compliance Demonstration Table" unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

2. Compliance Demonstration(s) (Continued)

Per 567 IAC.25.1(7)"a", at the Department's request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height (feet from the ground)	76
Discharge Style	Vertical Unobstructed
Stack Outlet Dimensions (inches)	32 x 32
Exhaust Temperature (°F)	Ambient
Exhaust Flowrate (scfm)	290

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

This emission unit is not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

This emission unit is not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. *The maximum amount of product conveyed using kiln#3 conveyor shall not exceed 70 tons per hour averaged over 3-hr period.*
 - i. For each hour, the owner or operator shall maintain records of the amount of product conveyed in tons.
 - ii. The owner or operator shall maintain records of the 3-hour average the amount of product conveyed in tons.
 - B. The owner or operator shall check for visible emissions from Kiln #3 Rockbox and Conveyor (EP LP-36) once per week at a time while Kiln #3 Rockbox and Conveyor (EP LP-36) is in operation. The owner or operator shall record the date and time of the observation and the presence or absence of visible emissions. If the owner or operator observes visible emissions from Kiln #3 Rockbox and Conveyor (EP LP-36), the owner or operator shall investigate the emission unit or operations associated with the emission unit and make corrections to the associated operations or equipment. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Kiln #3 Rockbox and Conveyor (EP LP-36) is not in operation.
-

6. Continuous Emission Monitoring Systems (CEMS)

Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“P”).

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
 - (2) This current amendment becomes void.
-

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

(1) Per 567 IAC 22.3(3)"b":

- (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
- (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.

- (2) Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - (b) At least seven (7) days before equipment relocation.
- (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
- (4) Unless specified per a federal regulation, the owner or the owner's authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:

- (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
- (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.
- (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
- (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.
- (5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 725-9549 Fax: (515) 725-9502	Field Office 6 1023 West Madison Washington, IA 52353 Telephone: (319) 653-2135 Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended

conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Permit No.	Project No.	Description	Date	Stack Testing

END OF PERMIT



Air Quality Construction Permit

Permit Number: 11-A-337-S1

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

563-324-1931
dosland@linwoodmining.com

401 E Front Street
Davenport, IA 52761

Permitted Equipment

Emission Point ID: Q-1

Emission Unit(s) and Control Equipment:

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
*	Quarry 1 Equipment and Pile 6 *	700 Tons Per Hour	Water Suppression

*See Emission Unit list in Condition 3

Equipment Location: 401 E Front Street
Davenport, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Project Number	Project Description	Stack Testing	Issuance Date
18-017	Amend permit limit and add water suppression	No	09/06/18

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. a. Emission Limits (Q1 Crusher and Q1 Conveyor#1)

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit.

The following emission limits shall not be exceeded:

Pollutant	lb/hr ¹	tons/yr ²	Other Limits	Reference/Basis
Particulate Matter (PM) – State	NA	NA	NA	NA
PM ₁₀	NA	NA	³	NA
PM _{2.5}	NA	NA	NA	NA
Opacity	NA	NA	⁴	567 IAC 23.3(2)“c”

¹ The emission limit is expressed as the average of three (3) runs.

² The emission limit is based on a twelve (12) month rolling total.

³ The limit for PM₁₀ emissions for Q-1 Crusher and Q-1 Belt #1 is established at 9.84 pounds of PM₁₀ per day. The PM₁₀ limit established for attainment and maintenance of PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the state implementation plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond lot line of the property.

1. b. Emission Limits (Quarry 1 Stacker and Pile 6)

The following emission limits shall not be exceeded:

Pollutant	lb/hr ¹	tons/yr ²	Other Limits	Reference/Basis
Particulate Matter (PM) – State	NA	NA	NA	NA
PM ₁₀	NA	NA	³	NA
PM _{2.5}	NA	NA	NA	NA
Opacity	NA	NA	⁴	567 IAC 23.3(2)“c”

¹ The emission limit is expressed as the average of three (3) runs.

² The emission limit is based on a twelve (12) month rolling total.

³ The limit for PM₁₀ emissions for Q-1 Stacker is established at 10.64 pounds per day The PM₁₀ limit established for attainment and maintenance of PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the state implementation plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond lot line of the property.

1. c. Emission Limits (NSPS OOO Q-1 Stacker)

Pollutant	lb/hr	tons/yr	Other Limits	Reference/Basis
Opacity (Q-1 Stacker)	NA	NA	7% ²	567 IAC 23.1(2)“bbb” ¹

¹ NSPS Subpart OOO reference.

² Limit established per Table 3 of Subpart OOO Part 60.

2. Compliance Demonstration(s)

Compliance Demonstration Table

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)“a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner’s intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height (feet from the ground)	NA
Discharge Style	NA
Stack Outlet Dimensions (inches)	NA
Exhaust Temperature (°F)	NA
Exhaust Flowrate (scfm)	NA

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

The following emission units are associated with this permit:

Emission Unit	Maximum Capacity	Control
Primary Crusher (Q-1)	700 tons per hour	Water Suppression
Conveyor #1 (Q1C1)	700 tons per hour	Water Suppression
Stacker (Q1C2)	700 tons per hour	Water Suppression
Pile 6 (In pit) Maximum Pile Area: 26,685 ft ²		

4. Federal Standards

A. New Source Performance Standards (NSPS):

The facility is of the source type subject to the New Source Performance Standard (NSPS), Subpart OOO, Standards of Performance for Nonmetallic Mineral Processing Plants. The crusher and conveyor #1 are not subject to the NSPS Subpart OOO, as they were built prior to the rule applicability date. The stacker is subject to the NSPS Subpart OOO.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

This emission unit is not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The owner or operator shall operate water suppression system when visible emissions from processing units Q-1 Crusher, Q-1 Conveyor#1 or Q-1 Stacker are observed.
- B. The owner or operator shall check for visible emissions each time the processing units Q-1 Crusher, Q-1 Conveyor#1 and Q-1 Stacker are in operation. This requirement shall not apply on the days that processing units Q-1 Crusher, Q-1 Conveyor#1 and Q-1 Stacker are not in operation.
 - i. The owner or operator shall record the date and time of the observation and the presence or absence of visible emissions.
 - ii. If the owner or operator observes visible emissions during operation of processing units Q-1 Crusher, Q-1 Conveyor#1 and Q-1 Stacker, the owner or operator shall investigate the emission unit, or the operations associated with the emission unit and make corrections to the associated operations or equipment. The owner or operator shall maintain a record of all corrective actions taken.
- C. The owner or operator shall develop an operating and maintenance plan for the water suppression system, including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the water suppression system.

- D. The owner or operator shall maintain the total area of Pile 6 to less than or equal to 26,685 square feet.
- i. The owner or operator shall maintain annual record of Pile 6 area in square feet.
- E. During high wind episodes (greater than 16 miles per hour) if visible emissions are observed from the working face of Pile 6, the owner or operator shall employ measures to eliminate or minimize emissions. Such measures may include applying dust suppressant to working face of the pile or coverings the working face of the pile.
- ii. The owner or operator shall develop a written plan to implement, at a minimum, measures to minimize emissions during high wind episodes as specified in condition 5E. The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.
- F. The owner or operator shall comply with the requirements per 40 CFR §60.670 through §60.676 for Q-1 Stacker.
-

6. Continuous Emission Monitoring Systems (CEMS)

Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)(f)).

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a

permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
- (2) This current amendment becomes void.

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

- (1) Per 567 IAC 22.3(3)"b":
 - (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
 - (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
- (2) Per 567 IAC 22.3(3)"f," when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - (b) At least seven (7) days before equipment relocation.
- (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the

contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.

- (4) Unless specified per a federal regulation, the owner or the owner's authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:

- The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:

- (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
- (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.
- (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
- (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.
- (5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 725-9549 Fax: (515) 725-9502	Field Office 6 1023 West Madison Washington, IA 52353 Telephone: (319) 653-2135 Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Permit No.	Project No.	Description	Date	Stack Testing
11-A-337	10-603	Permit new conveyor system layout for grandfathered primary crusher	06/16/2011	No

END OF PERMIT



Air Quality Construction Permits Collection of Air Permits

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

(563) 324-1391, Ext. 1140
dosland@linwoodmining.com

401 E Front St
Davenport, IA 52804

Project/Process Description

Sugarbeet Loadout System

Equipment Location: 401 E Front St
Davenport, Iowa 52804

Project Number: 25-225

Project Description: Increase equipment operating capacity, increase annual ton-per-year throughput for Material Storage Pile I, modify emission limits, and amend equipment list.

Date: December 10, 2025

The permits in this document are issued in accordance with 567 Iowa Administrative Code Chapter 22, and are issued subject to the terms and conditions contained in this document. Issuance of the permits in this document shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law. If any permit contained in this document is modified, superseded, expires, or for any other reason changes or ceases to exist, the status of that permit shall not affect the validity or enforceability of any other permit contained in this document.

Under the Direction of the Director of the
Department of Natural Resources

**List of Emission Units, Control Equipment, Emission Points, and Permits
Sugarbeet Loadout System**

**Table 1.A
Sugarbeet Conveying System**

EU ID	Emission Unit Description	Operating Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU Q11C-1	Feed Conveyor	200 tons/hour, limestone	Building Enclosure (CE Q11C-A)	EP Q-11C	No	18-A-111-S2
EU Q11C-5	Weigh Conveyor	200 tons/hour, limestone				

**Table 1.B
Sugarbeet Pile I System**

EU ID	Emission Unit Description	Operating Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU Q11C-6	Sugarbeet Stacker	200 tons/hour, limestone	None	EP Pile I	No	25-A-231
EU Pile I	Material Storage Pile I	28,179 square feet	Wind Screen (CE Q11C-B)		No	

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in any permit contained in this “Collection of Air Permits.”

A. The following emission limits shall not be exceeded per emission point:

Table 1 – Emission Limits

EP ID	Pollutant	lb/day	Other Limits	Reference/Basis
EP Q-11C	Particulate Matter (PM) – State	1.72 ¹	NA	NA
	PM ₁₀	0.60 ^{1,2}	NA	NAAQS
	PM _{2.5}	0.22 ¹	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“c”
EP Pile I	Particulate Matter (PM) – State	11.28 ⁴	NA	NA
	PM ₁₀	5.28 ^{2,4}	NA	NAAQS
	PM _{2.5}	0.72 ⁴	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“c”

¹ Established in Project Number 25-225, per facility’s request, to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability. The emission limit is based on a building enclosure efficiency of 95 percent.

² Established in Project Number 25-225 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

³ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property.

⁴ Established in Project Number 25-225, per facility’s request, to keep the project minor for purposes of the PSD applicability. The emission limit is based on a wind screen efficiency of 50 percent, a maximum silt content of 3.9 percent and a minimum moisture content of 2.1 percent for Material Storage Pile I.

2. Compliance Demonstration(s)

For each Emission Point listed in the “Compliance Demonstrations” table, if an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

Table 2 - Compliance Demonstrations

EP ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EP Q-11C	PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
	PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9
EP Pile I	PM – State	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
	PM ₁₀	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	PM _{2.5}	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

¹ See Permit Condition 5 for the required recordkeeping requirements.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 21.10(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department for review no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

The emission points shall conform to the specifications listed below:

Table 3 - Emission Point Characteristics

EP ID	Stack Height (feet)	Discharge Style	Stack Opening (inches)	Stack Temperature (°F)	Exhaust Flowrate (scfm)
EP Q-11C	(1)	(1)	(1)	(1)	(1)
EP Pile I	(2)	(2)	(2)	(2)	(2)

⁽¹⁾ The emission units associated with this emission point are located inside a building enclosure.

⁽²⁾ There is no physical stack associated with this emission point. Fugitive emissions are generated when the working face of Pile I is disturbed during facility normal operation.

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

- (1) The emission units associated with Emission Point Q-11C are located at a facility that is subject to NSPS Subpart OOO (*Standards of Performance for Nonmetallic Mineral Processing Plants*). However, these units are not subject to this subpart, because they were constructed prior to the applicability date (after August 31, 1983) of Subpart OOO and they have not been modified or reconstructed since their initial construction.
- (2) The Sugarbeet Stacker (EU Q11C-6) is located at a facility that is subject to NSPS Subpart OOO (*Standards of Performance for Nonmetallic Mineral Processing Plants*). However, EU Q11C-6 is not subject to Subpart OOO, because it does not meet the definition of “*transfer point*” in §60.671 of Subpart OOO.
- (3) Material Storage Pile I (EU Pile I) is not an affected emission unit under NSPS, because there are no applicable categories at this time.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (1) This facility (Plant No. 82-01-015) is of the source category affected by 40 CFR Part 63, Subpart AAAAA (*National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants*). However, this facility is not subject to this subpart, because it has been determined under 40 CFR §63.7142 of Subpart AAAAA that this facility is a NESHAP area source.
- (2) Material Storage Pile I (EU Pile I) is not an affected emission unit under NESHAP, because there are no applicable categories at this time

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by these permits shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for these permits shall be:

- A. The owner or operator shall decommission the Screener (EU Q11C-2), the Overs Conveyor (EU Q11C-3), and the Unders Conveyor (EU Q11C-4) within 120 days from the completion date of the changes requested under Project Number 25-225.
 - (1) The owner or operator shall maintain a record of the date when the decommission of the Screener (EU Q11C-2), the Overs Conveyor (EU Q11C-3), and the Unders Conveyor (EU Q11C-4) is completed.

B. The owner or operator shall operate the equipment described in Tables 1.A and 1.B as follows:

- (1) Whenever any of the equipment described in Tables 1.A and 1.B is operating, the owner or operator shall take reasonable precautions to prevent the discharge beyond the lot line of the property. Reasonable precautions include, but are not limited to:
 - a. The installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials.
 - b. The use, where practical, of water or chemicals for control of dusts.
- (2) The owner or operator shall maintain the Feed Conveyor (EU Q11C-1) and the Weigh Conveyor (EU Q11C-5) inside a building enclosure (CE Q11C-A) to utilize 95 percent reduction of particulate emissions generated by the operation of these units.
 - a. The owner or operator shall develop an operating and maintenance plan for the building enclosure, including periodic inspections and a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - b. The owner or operator shall maintain a record of all inspections and maintenance activities and any action resulting from the inspection and maintenance of the building enclosure.
 - c. The owner or operator shall conduct visible emissions observations, once per calendar day, on the building where the Feed Conveyor (EU Q11C-1) and the Weigh Conveyor (EU Q11C-5) are located. This requirement shall not apply on the days that none of these units is operating.
 - i. The owner or operator shall record the date and time of the observation and the presence or absence of visible emission.
 - ii. If visible emissions are observed, the owner or operator shall investigate the emission unit or control equipment and make corrections to the associated operations or equipment.
 - iii. The owner or operator shall maintain a record of all corrective actions taken.

- (3) The owner or operator shall install a Wind Screen (CE Q11C-B) on the hopper associated with Material Storage Pile I (EU Pile I).
 - a. The owner or operator shall maintain a record of the date when installation of the Wind Screen (CE Q11C-B) was completed.
 - b. The owner or operator shall maintain the Wind Screen (CE Q11C-B) in a manner to minimize emissions and achieve 50 percent reduction in emissions due to transfer of material from the hopper associated with Material Storage Pile I (EU Pile I). At a minimum, the Wind Screen (CE Q11C-B) shall be enclosed on three sides, at a height of 5 feet above the hopper and maintained in good working order.
 - i. The owner or operator shall develop an operating and maintenance plan for the Wind Screen (CE Q11C-B), including periodic inspections and a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - ii. The owner or operator shall maintain a record of all inspections and maintenance activities and any action resulting from the inspection and maintenance of the Wind Screen (CE Q11C-B).
- (4) The throughput for Material Storage Pile I (EU Pile I) shall not exceed 250,000 tons of limestone per 12-month rolling period.
 - a. The owner or operator shall install equipment necessary to monitor the throughput for the Material Storage Pile I (EU Pile I). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile I (EU Pile I) on a monthly basis.
 - c. The owner or operator shall calculate and record the total limestone throughput, in tons, for Material Storage Pile I (EU Pile I) on a rolling 12-month basis.
- (5) The maximum area for Material Storage Pile I (EU Pile I) shall not exceed 28,179 square feet.
 - a. The owner or operator shall maintain annual records of the Material Storage Pile I (EU Pile I) area, in square feet.
 - b. During high wind episodes (greater than 12 miles per hour), if visible emissions are observed from the working face of Material Storage Pile I (EU Pile I), the owner or operator shall employ measures to eliminate or minimize emissions. Such measures may include applying dust suppressant or covering the working face of Material Storage Pile I (EU Pile I).
 - i. The owner or operator shall develop a written plan to implement, at a minimum, measures to minimize emissions during high wind episodes (greater than 12 miles per hour).
 1. The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.

- (6) The owner or operator shall maintain Material Storage Pile I (EU Pile I) a minimum distance of 85 feet from the fence along Highway 22.
- a. The owner or operator shall maintain records of the date when Material Storage Pile (EU Pile I) was moved 85 feet from the fence line along Highway 22.
 - b. The owner or operator shall maintain annual records of the distance from the fence line alone Highway 22 for Material Storage Pile (EU Pile I).
-

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Department Review

These permits are issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in these permits, any control equipment covered by these permits shall operate at all times when the emission unit(s) covered by these permits are in operation.

These permits are issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause the affected permit or permits to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

These permits are for the construction and operation of specific emission unit(s), control equipment, and emission point(s) as described in these permits and in the applications for these permits. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in these permits conform to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter any of the emission unit(s), or emission point(s), or the associated control equipment without the required amended permit(s).

Any owner or operator of the specified emission unit(s), emission point(s), or associated control equipment, including any person who becomes an owner or operator subsequent to the issuance date of the affected permit(s), is responsible for assuring that the installation, operation, and maintenance of the equipment listed in the permit(s) is in compliance with the provisions of the permit(s) and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, these permits are not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend the permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) The permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
 - (2) This current amendment becomes void.
-

11. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

These requirements shall apply to each permit included in this “Collection of Air Permits” document.

- A. The owner or operator shall furnish the Department the following written notifications:
- (1) In accordance with 567 IAC 22.3(3)“b”, dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)“b” shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)“b”.
 - (2) In accordance with 567 IAC 22.3(3)“f”, when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
 - (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
 - (4) Unless specified, in accordance with a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.
- If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.
- B. The owner or operator shall furnish the Department with the following reports:
- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.

- (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.
 - (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).
- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Table 6 – Permit History

Project No.	Permit No.	Description	Stack Testing	Issuance Date
18-017	18-A-111	Issue permit to unpermitted screening plant and Establish PM ₁₀ Emission Limits	No	09/06/2018
18-366	18-A-111-S1	Increase Equipment Operating Capacity; Move Material Storage Pile I back 85 feet	No	03/14/2019
25-225	18-A-111-S2	Increase Equipment Operating Capacity, Modify Emission Limits, and Amend Equipment List	No	12/10/2025
	25-A-231	Issue new Permit to EU Q11C-6 and Material Storage Pile, previously permitted under Permit No. 18-A-111-S1 and Increase Operating Capacity	No	

END OF PERMIT



Air Quality Construction Permits Collection of Air Permits

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

(563) 324-1391, Ext. 1140
dosland@linwoodmining.com

401 E Front St
Davenport, IA 52804

Project/Process Description

Sugarbeet Loadout System

Equipment Location: 401 E Front St
Davenport, Iowa 52804

Project Number: 25-225

Project Description: Increase equipment operating capacity, increase annual ton-per-year throughput for Material Storage Pile I, modify emission limits, and amend equipment list.

Date: December 10, 2025

The permits in this document are issued in accordance with 567 Iowa Administrative Code Chapter 22, and are issued subject to the terms and conditions contained in this document. Issuance of the permits in this document shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law. If any permit contained in this document is modified, superseded, expires, or for any other reason changes or ceases to exist, the status of that permit shall not affect the validity or enforceability of any other permit contained in this document.

Under the Direction of the Director of the
Department of Natural Resources

**List of Emission Units, Control Equipment, Emission Points, and Permits
Sugarbeet Loadout System**

**Table 1.A
Sugarbeet Conveying System**

EU ID	Emission Unit Description	Operating Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU Q11C-1	Feed Conveyor	200 tons/hour, limestone	Building Enclosure (CE Q11C-A)	EP Q-11C	No	18-A-111-S2
EU Q11C-5	Weigh Conveyor	200 tons/hour, limestone				

**Table 1.B
Sugarbeet Pile I System**

EU ID	Emission Unit Description	Operating Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU Q11C-6	Sugarbeet Stacker	200 tons/hour, limestone	None	EP Pile I	No	25-A-231
EU Pile I	Material Storage Pile I	28,179 square feet	Wind Screen (CE Q11C-B)		No	

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in any permit contained in this “Collection of Air Permits.”

A. The following emission limits shall not be exceeded per emission point:

Table 1 – Emission Limits

EP ID	Pollutant	lb/day	Other Limits	Reference/Basis
EP Q-11C	Particulate Matter (PM) – State	1.72 ¹	NA	NA
	PM ₁₀	0.60 ^{1,2}	NA	NAAQS
	PM _{2.5}	0.22 ¹	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“c”
EP Pile I	Particulate Matter (PM) – State	11.28 ⁴	NA	NA
	PM ₁₀	5.28 ^{2,4}	NA	NAAQS
	PM _{2.5}	0.72 ⁴	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“c”

¹ Established in Project Number 25-225, per facility’s request, to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability. The emission limit is based on a building enclosure efficiency of 95 percent.

² Established in Project Number 25-225 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

³ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property.

⁴ Established in Project Number 25-225, per facility’s request, to keep the project minor for purposes of the PSD applicability. The emission limit is based on a wind screen efficiency of 50 percent, a maximum silt content of 3.9 percent and a minimum moisture content of 2.1 percent for Material Storage Pile I.

2. Compliance Demonstration(s)

For each Emission Point listed in the “Compliance Demonstrations” table, if an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

Table 2 - Compliance Demonstrations

EP ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EP Q-11C	PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
	PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9
EP Pile I	PM – State	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
	PM ₁₀	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	PM _{2.5}	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9
		None	NA	1 hour	40 CFR 60, Appendix A, Method 9

¹ See Permit Condition 5 for the required recordkeeping requirements.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 21.10(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department for review no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

The emission points shall conform to the specifications listed below:

Table 3 - Emission Point Characteristics

EP ID	Stack Height (feet)	Discharge Style	Stack Opening (inches)	Stack Temperature (°F)	Exhaust Flowrate (scfm)
EP Q-11C	(1)	(1)	(1)	(1)	(1)
EP Pile I	(2)	(2)	(2)	(2)	(2)

⁽¹⁾ The emission units associated with this emission point are located inside a building enclosure.

⁽²⁾ There is no physical stack associated with this emission point. Fugitive emissions are generated when the working face of Pile I is disturbed during facility normal operation.

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

- (1) The emission units associated with Emission Point Q-11C are located at a facility that is subject to NSPS Subpart OOO (*Standards of Performance for Nonmetallic Mineral Processing Plants*). However, these units are not subject to this subpart, because they were constructed prior to the applicability date (after August 31, 1983) of Subpart OOO and they have not been modified or reconstructed since their initial construction.
- (2) The Sugarbeet Stacker (EU Q11C-6) is located at a facility that is subject to NSPS Subpart OOO (*Standards of Performance for Nonmetallic Mineral Processing Plants*). However, EU Q11C-6 is not subject to Subpart OOO, because it does not meet the definition of “*transfer point*” in §60.671 of Subpart OOO.
- (3) Material Storage Pile I (EU Pile I) is not an affected emission unit under NSPS, because there are no applicable categories at this time.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (1) This facility (Plant No. 82-01-015) is of the source category affected by 40 CFR Part 63, Subpart AAAAA (*National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants*). However, this facility is not subject to this subpart, because it has been determined under 40 CFR §63.7142 of Subpart AAAAA that this facility is a NESHAP area source.
- (2) Material Storage Pile I (EU Pile I) is not an affected emission unit under NESHAP, because there are no applicable categories at this time.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by these permits shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for these permits shall be:

- A. The owner or operator shall decommission the Screener (EU Q11C-2), the Overs Conveyor (EU Q11C-3), and the Unders Conveyor (EU Q11C-4) within 120 days from the completion date of the changes requested under Project Number 25-225.
 - (1) The owner or operator shall maintain a record of the date when the decommission of the Screener (EU Q11C-2), the Overs Conveyor (EU Q11C-3), and the Unders Conveyor (EU Q11C-4) is completed.

B. The owner or operator shall operate the equipment described in Tables 1.A and 1.B as follows:

- (1) Whenever any of the equipment described in Tables 1.A and 1.B is operating, the owner or operator shall take reasonable precautions to prevent the discharge beyond the lot line of the property. Reasonable precautions include, but are not limited to:
 - a. The installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials.
 - b. The use, where practical, of water or chemicals for control of dusts.
- (2) The owner or operator shall maintain the Feed Conveyor (EU Q11C-1) and the Weigh Conveyor (EU Q11C-5) inside a building enclosure (CE Q11C-A) to utilize 95 percent reduction of particulate emissions generated by the operation of these units.
 - a. The owner or operator shall develop an operating and maintenance plan for the building enclosure, including periodic inspections and a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - b. The owner or operator shall maintain a record of all inspections and maintenance activities and any action resulting from the inspection and maintenance of the building enclosure.
 - c. The owner or operator shall conduct visible emissions observations, once per calendar day, on the building where the Feed Conveyor (EU Q11C-1) and the Weigh Conveyor (EU Q11C-5) are located. This requirement shall not apply on the days that none of these units is operating.
 - i. The owner or operator shall record the date and time of the observation and the presence or absence of visible emission.
 - ii. If visible emissions are observed, the owner or operator shall investigate the emission unit or control equipment and make corrections to the associated operations or equipment.
 - iii. The owner or operator shall maintain a record of all corrective actions taken.

- (3) The owner or operator shall install a Wind Screen (CE Q11C-B) on the hopper associated with Material Storage Pile I (EU Pile I).
 - a. The owner or operator shall maintain a record of the date when installation of the Wind Screen (CE Q11C-B) was completed.
 - b. The owner or operator shall maintain the Wind Screen (CE Q11C-B) in a manner to minimize emissions and achieve 50 percent reduction in emissions due to transfer of material from the hopper associated with Material Storage Pile I (EU Pile I). At a minimum, the Wind Screen (CE Q11C-B) shall be enclosed on three sides, at a height of 5 feet above the hopper and maintained in good working order.
 - i. The owner or operator shall develop an operating and maintenance plan for the Wind Screen (CE Q11C-B), including periodic inspections and a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - ii. The owner or operator shall maintain a record of all inspections and maintenance activities and any action resulting from the inspection and maintenance of the Wind Screen (CE Q11C-B).
- (4) The throughput for Material Storage Pile I (EU Pile I) shall not exceed 250,000 tons of limestone per 12-month rolling period.
 - a. The owner or operator shall install equipment necessary to monitor the throughput for the Material Storage Pile I (EU Pile I). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile I (EU Pile I) on a monthly basis.
 - c. The owner or operator shall calculate and record the total limestone throughput, in tons, for Material Storage Pile I (EU Pile I) on a rolling 12-month basis.
- (5) The maximum area for Material Storage Pile I (EU Pile I) shall not exceed 28,179 square feet.
 - a. The owner or operator shall maintain annual records of the Material Storage Pile I (EU Pile I) area, in square feet.
 - b. During high wind episodes (greater than 12 miles per hour), if visible emissions are observed from the working face of Material Storage Pile I (EU Pile I), the owner or operator shall employ measures to eliminate or minimize emissions. Such measures may include applying dust suppressant or covering the working face of Material Storage Pile I (EU Pile I).
 - i. The owner or operator shall develop a written plan to implement, at a minimum, measures to minimize emissions during high wind episodes (greater than 12 miles per hour).
 1. The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.

- (6) The owner or operator shall maintain Material Storage Pile I (EU Pile I) a minimum distance of 85 feet from the fence along Highway 22.
- a. The owner or operator shall maintain records of the date when Material Storage Pile (EU Pile I) was moved 85 feet from the fence line along Highway 22.
 - b. The owner or operator shall maintain annual records of the distance from the fence line along Highway 22 for Material Storage Pile (EU Pile I).
-

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Department Review

These permits are issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in these permits, any control equipment covered by these permits shall operate at all times when the emission unit(s) covered by these permits are in operation.

These permits are issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause the affected permit or permits to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

These permits are for the construction and operation of specific emission unit(s), control equipment, and emission point(s) as described in these permits and in the applications for these permits. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in these permits conform to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter any of the emission unit(s), or emission point(s), or the associated control equipment without the required amended permit(s).

Any owner or operator of the specified emission unit(s), emission point(s), or associated control equipment, including any person who becomes an owner or operator subsequent to the issuance date of the affected permit(s), is responsible for assuring that the installation, operation, and maintenance of the equipment listed in the permit(s) is in compliance with the provisions of the permit(s) and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, these permits are not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend the permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) The permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
 - (2) This current amendment becomes void.
-

11. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

These requirements shall apply to each permit included in this “Collection of Air Permits” document.

- A. The owner or operator shall furnish the Department the following written notifications:
- (1) In accordance with 567 IAC 22.3(3)“b”, dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)“b” shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)“b”.
 - (2) In accordance with 567 IAC 22.3(3)“f”, when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
 - (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
 - (4) Unless specified, in accordance with a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.
- If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.
- B. The owner or operator shall furnish the Department with the following reports:
- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.

- (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.
 - (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).
- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Table 6 – Permit History

Project No.	Permit No.	Description	Stack Testing	Issuance Date
18-017	18-A-111	Issue permit to unpermitted screening plant and Establish PM ₁₀ Emission Limits	No	09/06/2018
18-366	18-A-111-S1	Increase Equipment Operating Capacity; Move Material Storage Pile I back 85 feet	No	03/14/2019
25-225	18-A-111-S2	Increase Equipment Operating Capacity, Modify Emission Limits, and Amend Equipment List	No	12/10/2025
	25-A-231	Issue new Permit to EU Q11C-6 and Material Storage Pile, previously permitted under Permit No. 18-A-111-S1 and Increase Operating Capacity	No	

END OF PERMIT



Air Quality Construction Permit

Permit Number: 20-A-156

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:

Darin Osland
Environmental Manager

Responsible Party:

Same

563-324-1931
dosland@linwoodmining.com

401 E Front Street
Davenport, IA 52804

Permitted Equipment

Emission Point ID: Q-12

Emission Unit(s) and Control Equipment:

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
*	Q-12 Equipment *	400 Tons per hour	None

*See Emission Unit list in Condition 3

Equipment Location: 401 E Front Street
Davenport, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Project Number	Project Description	Stack Testing	Issuance Date
20-169	Original Permit - Aggregate Processing Plant	Yes	09/03/20

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. a. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

Pollutant	lb/hr ¹	tons/yr ²	Other Limits	Reference/Basis
Particulate Matter (PM) – State	NA	NA	NA	NA
PM ₁₀	NA	NA	³	NA
PM _{2.5}	NA	NA	NA	NA
Opacity (Screeners, Conveyors)	NA	NA	10% ⁴	567 IAC 23.1(2)“bbb” ⁵
Opacity (Crusher)	NA	NA	15% ⁴	567 IAC 23.1(2)“bbb” ⁵

¹ The emission limit is expressed as the average of three (3) runs.

² The emission limit is based on a twelve (12) month rolling total.

³ The limit for PM₁₀ emissions for Q-12 equipment is established at 131 pounds of PM₁₀ per day. The PM₁₀ limit established for attainment and maintenance of PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the state implementation plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ Limit established per Table 3 of Subpart OOO Part 60.

⁵ NSPS Subpart OOO reference.

2. Compliance Demonstration(s)

Compliance Demonstration Table

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	Initial Stack Test ¹	One-time	1 hour	40 CFR 60, Appendix A, Method 9

¹ Opacity test/monitoring shall be conducted per NSPS Subpart OOO (40 CFR §60.670 – 40 CFR §60.676)

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)"a", at the Department's request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. a. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height (feet from the ground)	NA
Discharge Style	NA
Stack Outlet Dimensions (inches)	NA
Exhaust Temperature (°F)	NA
Exhaust Flowrate (scfm)	NA

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

3. b. The following emission units are associated with this permit:

Emission Unit ID	Emission Unit Name	Maximum Capacity	Control
Q-12-01	Crusher	400 tons per hour	None
Q-12-02	Screener	400 tons per hour	None
Q-12-03	Conveyor Overs	100 tons per hour	None
Q-12-04	Conveyor Cut	300 tons per hour	None
Q-12-05	Conveyor Unders	100 tons per hour	None
Q-12-06	Conveyor Screen	400 tons per hour	None

4. Federal Standards

A. New Source Performance Standards (NSPS):

The units associated with EP Q-12 are of the source type subject to the New Source Performance Standard (NSPS), Subpart OOO, Standards of Performance for Nonmetallic Mineral Processing Plants. Q-12 equipment are subject to the NSPS Subpart OOO from §60.670 to §60.676.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

These emission units are not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The maximum amount of product processed in the Crusher (EU Q-12-01) shall not exceed 400 tons per hour averaged over 24-hr period.
 - i. The owner or operator shall maintain records of the 24-hour average of the amount of product processed in the Crusher (EU Q-12-01) in tons.
 - ii. The owner or operator shall maintain records of the number of hours the Crusher (EU Q-12-01) is operated on a daily basis.
 - iii. The owner or operator shall calculate and maintain records of the 24-hr average rate of the material processed in tons per hour on a daily basis.
- B. The Q-12 Equipment listed in 3. b. of this permit shall not operate more than 3,250 hours in any rolling 12-month period.
 - i. The owner or operator shall maintain records of the number of hours the Q-12 Equipment is operated on a daily basis.
 - ii. The owner or operator shall calculate and record the monthly total hours of operation of the Q-12 Equipment.
 - iii. The owner or operator shall calculate and record the rolling 12-month total of the hours of operation of the Q-12 equipment.
- C. The owner or operator can use engine run-time hours for the engine used to power the Q-12 Equipment; or,
- D. The owner or operator can use paper records showing daily operation in hours of the Q-12 Equipment.
- E. The owner or operator shall follow requirements per 40 CFR §60.670 through §60.676.

6. Continuous Emission Monitoring Systems (CEMS)

Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
 - (2) This current amendment becomes void.
-

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment,

which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

- (1) Per 567 IAC 22.3(3)“b”:
 - (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
 - (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
- (2) Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - (b) At least seven (7) days before equipment relocation.
- (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
- (4) Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:

- (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
- (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.
- (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
- (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.
- (5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be

available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau Iowa Department of Natural Resources 502 E. 9 th St. Des Moines, IA 50319 Telephone: (515) 725-8200 Fax: (515) 725-9501	Field Office 6 1023 West Madison Washington, IA 52353 Telephone: (319) 653-2135 Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Permit No.	Project No.	Description	Date	Stack Testing

END OF PERMIT



Air Quality Construction Permit

Permit Number: 18-A-112-S2

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corp

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

(563) 324-1931 x 1140
dosland@linwoomining.com

401 E Front St
Davenport, IA 52804

Permitted Equipment

Emission Point ID: EP Q-2LP

Table 1 – Emission Units and Control Equipment

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
Q-2LP Crushing & Screening Lower Plant (See Permit Condition 3, Table 7 for Equipment Description)			

Equipment Location: 401 East Front Street
Davenport, Iowa 52804

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Table 2 – Project Issuance Information

Project Number	Project Description	Stack Testing	Issuance Date
23-353	Add Pile 9 to Equipment List. Pile 9 was last included in Permit No. 02-A-017-S3 (EP Q-3P)	No	09/25/2024

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

**Table 3 – Emission Limits
Q-2LP Crusher, Belts, and Screens**

Pollutant	Limits	Reference/Basis
Particulate Matter (PM) – State	NA	NA
PM ₁₀	See Footnote 1	NA
PM _{2.5}	NA	NA
Opacity	See Footnote 2	567 IAC 23.3(2)“c”

¹ The emission limit is established at 127.92 pounds per day for attainment and maintenance of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

² The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property.

**Table 4 – Emission Limits
Q-2LP Stackers, Pile 7, and Pile 9**

Pollutant	Limits	Reference/Basis
Particulate Matter (PM) – State	NA	NA
PM ₁₀	See Footnote 1	NA
PM _{2.5}	NA	NA
Opacity	See Footnote 2	567 IAC 23.3(2)“c”

¹ The emission limit is established at 10.74 pounds per day for attainment and maintenance of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

² The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property.

2. Compliance Demonstration(s)

If an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

Table 5 - Compliance Demonstrations

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M Method 202
PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 21.10(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department for review no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.

- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed in the table below.

Table 6 – Emission Point Parameters

Parameter	Value
Stack Height (feet from the ground)	*
Discharge Style	*
Stack Outlet Dimensions (inches)	*
Exhaust Temperature (°F)	*
Exhaust Flowrate (scfm)	*

*Emissions from the units covered by this permit do not vent through a physical stack.

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

Table 7 – Emission Units and Control Equipment

Emission Unit	Maximum Capacity	Maximum Design Capacity	Control Equipment Description and ID
LP1 Belt	400 tons limestone/hour	300 tons limestone/hour	None
LP1 Screen	400 tons limestone/hour		
LP1 Crusher	100 tons limestone/hour		
LP6 Belt	100 tons limestone/hour		
LP9 Belt	100 tons limestone/hour		
LP4A Belt	75 tons limestone/hour		
LP2 Screen	100 tons limestone/hour		
LP3 Stacker	125 tons limestone/hour		
LP4 Stacker	75 tons limestone/hour		
LP5 Stacker	40 tons limestone/hour		
LP8 Stacker	60 tons limestone/hour		
Pile 7 (In Pit)	19,461 square feet	NA	
Pile 9 (In Pit)	123,623 square feet	NA	

4. Federal Standards

A. New Source Performance Standards (NSPS):

- (1) The emission units covered by this permit are located at a facility that is subject to NSPS Subpart OOO (*Standards of Performance for Nonmetallic Mineral Processing Plants*). However, these emission units are not subject to this subpart, because they were constructed prior to the applicability date (after August 31, 1983) of Subpart OOO and they have not been modified or reconstructed since their initial construction.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (1) The emission units covered by this permit are not affected emission units under the federal standards for emissions of hazardous air pollutants for source categories, as defined in 40 CFR Part 63, because there are no applicable categories at this time.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by this permit shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The owner or operator shall conduct daily visible emissions observations on each emission unit covered by this permit. This requirement shall not apply to any emission unit in this permit that is not in operation.
 - (1) The owner or operator shall record the date and time of the observation and the presence or absence of visible emissions.
 - (2) If visible emissions from any of the emission units covered by this permit are observed, the owner or operator shall investigate the affected emission units and make corrections to the associated operation or equipment.
 - (3) The owner or operator shall maintain a record of all corrective actions taken.
- B. The total area of Pile 7 shall not exceed 19,461 square feet.
 - (1) The owner or operator shall maintain annual records of the total Pile 7 area, in square feet.
- C. The total area of Pile 9 shall not exceed 123,623 square feet.
 - (1) The owner or operator shall maintain annual records of the total Pile 9 area, in square feet.
- D. During high wind episodes (greater than 16 miles per hour), if visible emissions are observed from the working face of Pile 7 or Pile 9, the owner or operator shall employ measures to eliminate or minimize emissions. Such measures may include applying dust suppressant to the working face of the pile or covering the working face of the pile.
 - (1) The owner or operator shall develop a written plan to implement, at a minimum, measures to minimize emissions during high wind episodes as specified in Permit Condition 5.D.
 - a. The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in this permit, any control equipment covered by this permit shall operate at all times when the emission unit(s) covered by this permit are in operation.

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
- (2) This current amendment becomes void.

11. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

- A. The owner or operator shall furnish the Department the following written notifications:
- (1) In accordance with 567 IAC 22.3(3)“b”, dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)“b” shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)“b”.
 - (2) In accordance with 567 IAC 22.3(3)“f”, when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
 - (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
 - (4) Unless specified, in accordance with a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.
- If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.
- B. The owner or operator shall furnish the Department with the following reports:
- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.
 - (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.
 - (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).

- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Table 4 – Permit History

Project No.	Permit No.	Description	Stack Testing	Date
18-017	18-A-112	Issue Permit to Unpermitted Plant and Establish PM ₁₀ Limits	No	09/06/2018
18-366	18-A-112-S1	Amend Emission Rate due to Change in Emission Factor	No	03/14/2019

END OF PERMIT



Air Quality Construction Permit

Permit Number: 18-A-113-S1

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:

Darin Osland
Environmental Manager

Responsible Party:

Same

(563) 324-1391, Ext. 1140

dosland@linwoodmining.com

401 E Front St
Davenport, IA 52804

Permitted Equipment

Emission Point ID: EP Q-2TP

Table 1 – Emission Unit(s) and Control Equipment

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
Quarry 2 Top Plant See Emission Unit Description in Table 7			

Equipment Location: 401 E Front Street
Davenport, Iowa 52804

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Table 2 – Project Issuance Information

Project Number	Project Description	Stack Testing	Issuance Date
25-225	Add new equipment; Amend equipment operating capacity; Rename existing equipment; and Modify emission limits	No	12/10/2025

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

**Table 3 – Federal Emission Limits
(New Source Performance Standards)**

Pollutant	Limits	Reference/Basis
Opacity	7% ^{1,2,3}	40 CFR Part 60, Subpart OOO [567 IAC 23.1(2)“bbb”] ⁴

¹ The emission limit is based on a six-minute average.

² Per Table 3 to Subpart OOO of Part 60, the owner or operator shall meet this limit for affected sources **without a capture system** that commenced construction, modification, or reconstruction on or after April 22, 2008.

³ The emission limit applies to Emission Units Q2TP-21, Q2TP-22, EU Q2TP-23 only.

⁴ Department’s reference to 40 CFR Part 60, Subpart OOO – *Standards of Performance for Nonmetallic Mineral Processing Plants* [40 CFR §60.670 – 40 CFR §60.676].

Table 4 – State Emission Limits

Pollutant	lb/day	Other Limits	Reference/Basis
Particulate Matter (PM) – State	104.79 ¹	NA	NA
PM ₁₀	37.36 ^{1,2}	NA	NAAQS
PM _{2.5}	11.87 ¹	NA	NA
Opacity	NA	See Footnote 3	567 IAC 23.3(2)“c”

¹ Established in Project Number 25-225 to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability. The emission limit includes emissions from Production Pile 4 that are based on a maximum silt content of 3.9 percent and a minimum moisture content of 2.1 percent.

² Established in Project Number 25-225 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

³ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property.

2. Compliance Demonstration(s)

If an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

**Table 5.A - Compliance Demonstrations
Emission Point Q-2TP**

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	Production Pile 4 Active Surface Silt and Moisture Sampling	Quarterly	NA	AP-42, Appendix C.1 and Appendix C.2 ¹
	Recordkeeping	See Footnote 2	NA	NA
	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
PM ₁₀	Production Pile 4 Active Surface Silt and Moisture Sampling	Quarterly	NA	AP-42, Appendix C.1 and Appendix C.2 ¹
	Recordkeeping	See Footnote 1	NA	NA
	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202

¹ Silt load testing shall be conducted according to the procedures outlined in AP-42, Appendix C.1 (*Procedures for Sampling Surface/Bulk Dust Loading*) and C.2 (*Procedures for Laboratory Analysis of Surface/Bulk Dust Loading Samples*).

² See Permit Condition 5 for the required recordkeeping requirements.

**Table 5.A - Compliance Demonstrations
Emission Point Q-2TP
(Continue)**

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM _{2.5}	Production Pile 4 Active Surface Silt and Moisture Sampling	Quarterly	NA	AP-42, Appendix C.1 and Appendix C.2 ¹
	Recordkeeping	See Footnote 2	NA	NA
	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

¹ Silt load testing shall be conducted according to the procedures outlined in AP-42, Appendix C.1 (*Procedures for Sampling Surface/Bulk Dust Loading*) and C.2 (*Procedures for Laboratory Analysis of Surface/Bulk Dust Loading Samples*).

² See Permit Condition 5 for the required recordkeeping requirements.

**Table 5.B - Compliance Demonstrations
Emission Units Q2TP-21, Q2TP-22, and Q2TP-23**

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
Opacity	Visible Emissions Observation ¹	Initial ¹	30 minutes ²	40 CFR 60, Appendix A, Method 9

¹ The owner or operator shall conduct initial and periodic visible emissions observations on Emission Units Q2TP-21, Q2TP-22, EU Q2TP-23 to demonstrate compliance with the emission limit in Permit Condition 1, Table 2.

² According to 40 CFR §60.675(c)(3) of Subpart OOO, when determining compliance with the fugitive emissions standard for any affected facility described under §60.672(b) or §60.672(e)(1) of Subpart OOO, the duration of the Method 9 (40 CFR Part 60, Appendix A-4) observations must be 30 minutes (five 6-minute averages).

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 21.10(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department for review no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed in the table below.

Table 6 – Emission Point Parameters

Parameter	Value
Stack Height (feet from the ground)	*
Discharge Style	*
Stack Outlet Dimensions (inches)	*
Exhaust Temperature (°F)	*
Exhaust Flowrate (scfm)	*

**There is no physical stack associated with the equipment described in Table 7.*

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

The emission units listed below are covered by this permit.

Table 7 – Emission Unit(s) and Control Equipment

EU ID	Description	Operating Capacity	Control Equipment Description and ID
EU Q2TP-1	TP1A Belt	400 tons/hour	Water Suppression (CE-Q2TP)
EU Q2TP-2	TP1B Belt	400 tons/hour	Water Suppression (CE-Q2TP)
EU Q2TP-3	TP1 N Sugarbeet Screen	170 tons/hour	Water Suppression (CE-Q2TP)
EU Q2TP-4	TP1 S Screen	495 tons/hour	Water Suppression (CE-Q2TP)
EU Q2TP-5	TP1 Crusher	60 tons/hour	Water Suppression (CE-Q2TP)
EU Q2TP-6	TP2 Belt	495 tons/hour	Water Suppression (CE-Q2TP)
EU Q2TP-7	TP3 Crusher Belt	25 tons/hour	Water Suppression (CE-Q2TP)
EU Q2TP-8	TP3 West Screen	150 tons/hour	Water Suppression (CE-Q2TP)
EU Q2TP-9	TP4 East Screen	175 tons/hour	Water Suppression (CE-Q2TP)
EU Q2TP-10	TP4 Crusher Return Belt	95 tons/hour	Water Suppression (CE-Q2TP)
EU Q2TP-11	TP5 Feed to Sugarbeet Screen	170 tons/hour	Water Suppression (CE Q2TP)
EU Q2TP-12	TP6 Cross Belt	325 tons/hour	Water Suppression (CE-Q2TP)
EU Q2TP-13	TP6 PEP Screen	5 tons/hour	Water Suppression (CE-Q2TP)
EU Q2TP-14	TP8 Belt	325 tons/hour	Water Suppression (CE-Q2TP)
EU Q2TP-15	TP9 Belt	125 tons/hour	Water Suppression (CE Q2TP)
EU Q2TP-16	TP11 Belt	125 tons/hour	Water Suppression (CE-Q2TP)
EU Q2TP-17	TP12 Belt	50 tons/hour	Water Suppression (CE-Q2TP)
EU Q2TP-18	TP14 to Belt Washer	100 tons/hour	Water Suppression (CE-Q2TP)
EU Q2TP-19	TP18 SB Unders Crossbelt	100 tons/hour	Water Suppression (CE-Q2TP)
EU Q2TP-20	TP19 SB Unders to TP4	35 tons/hour	Water Suppression (CE-Q2TP)
EU Q2TP-21	TP Sugarbeet Overs Crossbelt	35 tons/hour	Water Suppression (CE-Q2TP)
EU Q2TP-22	TP Sugarbeet Overs Belt to TP3	35 tons/hour	Water Suppression (CE-Q2TP)
EU Q2TP-23	TP Sugarbeet Cut Crossbelt	100 tons/hour	Water Suppression (CE-Q2TP)
EU Q2TP-24	TP Sugarbeet Stacker 3"-5"	100 tons/hour	None
EU Q2TP-25	TP7 Stacker 2" Down	100 tons/hour	None
EU Q2TP-26	TP10 Stacker 2" Clean	125 tons/hour	None
EU Q2TP-27	TP13 Stacker ½" Down	50 tons/hour	None
EU Q2TP-28	TP15 Stacker 1" Dry	100 tons/hour	None
EU Q2TP-29	TP16 Belt Stacker, Saturated	100 tons/hour	None
EU Q2TP-30	TP17 Stacker	50 tons/hour	None
EU Pile 4	Production Pile 4 (47,468 square feet)	1,320,000 tons/year	None

4. Federal Standards

A. New Source Performance Standards (NSPS):

- (1) Emission Units Q2TP-1 to Q2TP-20 are located at a facility that is subject to NSPS Subpart OOO (*Standards of Performance for Nonmetallic Mineral Processing Plants*). However, these units are not subject to this subpart, because they were constructed prior to the applicability date (after August 31, 1983) of Subpart OOO and they have not been modified or reconstructed since their initial construction.
- (2) The following subparts apply to the emission units listed in Table 8.

Table 8 – Applicable NSPS Standards

ID	Subpart	Title	Type	State Reference (567 IAC)	Federal Reference (40 CFR)
EU Q2TP-21	A	General Provisions	NA	23.1(2)	§60.1 – §60.19
EU Q2TP-22	OOO	Standards of Performance for Nonmetallic Mineral Processing Plants	Construction, modification, or reconstruction on or after 4/22/2008	23.1(2)“bbb”	§60.670 - §60.676
EU Q2TP-23					

- (3) Stackers Q2TP-24 to Q2TP-30 are located at a facility that is subject to NSPS Subpart OOO (*Standards of Performance for Nonmetallic Mineral Processing Plants*). However, these units are not subject to this subpart, because they do not meet the definition of “*transfer point*” in §60.671 of Subpart OOO.
- (4) Production Pile 4 is not an affected emission unit under NSPS, because there are no applicable categories at this time.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (1) This facility (Plant No. 82-01-015) is of the source category affected by 40 CFR Part 63, Subpart AAAAA (*National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants*). However, this facility is not subject to this subpart, because it has been determined under 40 CFR §63.7142 of Subpart AAAAA that this facility is a NESHAP area source.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by these permits shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for these permits shall be:

A. The owner or operator shall operate the equipment described in Permit Condition 3, Table 7 as follows:

- (1) Whenever any of the equipment described in Permit Condition 1, Table 7 is operating, the owner or operator shall take reasonable precautions to prevent the discharge beyond the lot line of the property. Reasonable precautions include, but are not limited to:
 - a. The installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials.
 - b. The use, where practical, of water or chemicals for control of dusts.
- (2) The owner or operator shall install a water suppression system (CE-Q2TP) to control dust emissions that may occur as a result of the operation of the processing units listed in Condition 3, Table 7.
 - a. The owner or operator shall develop an operating and maintenance plan for the water suppression system (CE-Q2TP), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - i. The owner or operator shall maintain a record of all inspections and maintenance activities and any action resulting from the inspection and maintenance of the water suppression system (CE-Q2TP).
- (3) The owner or operator shall conduct visible emissions observations each time the processing units listed in Condition 3, Table 7 are in operation. This requirement shall not apply on the days that none of the processing units listed in Condition 3, Table 7 is operating.
 - a. The owner or operator shall record the date and time of the observation and the presence or absence of visible emission.
 - b. If visible emissions are observed, the owner or operator shall:
 - i. Operate the water suppression system (CE-Q2TP).
 - ii. Investigate the emission unit or control equipment and make corrections to the associated operations or equipment.
 - iii. Maintain a record of all corrective actions taken.

- (4) The throughput for Production Pile 4 (EU Pile 4) shall not exceed 1,320,000 tons of limestone per 12-month rolling period.
- a. The owner or operator shall install equipment necessary to monitor the throughput for Production Pile 4 (EU Pile 4). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone throughput, in tons, for Production Pile 4 (EU Pile 4) on a monthly basis.
 - c. The owner or operator shall calculate and record the total limestone throughput, in tons, for Production Pile 4 (EU Pile 4) on a rolling 12-month basis.
- (5) The maximum area for Production Pile 4 (EU Pile 4) shall not exceed 47,468 square feet.
- a. The owner or operator shall maintain annual records of the Production Pile 4 (EU Pile 4) area, in square feet.
- (6) The average active surface moisture content for Production Pile 4 (EU Pile 4) shall be greater than or equal to 2.1 percent by weight.
- a. The owner or operator shall sample the active surface of Production Pile 4 (EU Pile 4) to determine moisture content as percent by weight once per calendar quarter.
 - b. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
 - c. The owner or operator shall determine the average moisture content as percent by weight for all samples taken per calendar quarter.
 - d. On a quarterly basis, the owner or operator shall maintain the following records for each sampling event:
 1. The date of the sample;
 2. The sample location;
 3. The measured moisture content as percent by weight;
 4. The average moisture content as percent by weight; and
 5. The operator's initials.
- (7) The average active surface silt content for Production Pile 4 (EU Pile 4) shall be less than or equal to 3.9 percent by weight.
- a. The owner or operator shall sample the active surface of Production Pile 4 (EU Pile 4) to determine silt content as percent by weight once per calendar quarter.
 - b. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
 - c. The owner or operator shall determine the average silt content as percent by weight for all samples taken per calendar quarter.

- d. On a quarterly basis, the owner or operator shall maintain the following records for each sampling event:
 - 1. The date of the sample;
 - 2. The sample location;
 - 3. The measured silt content as percent by weight;
 - 4. The average silt content as percent by weight; and
 - 5. The operator's initials.
- (8) During high wind episodes (greater than 12 miles per hour), if visible emissions are observed from the working face of Production Pile 4 (EU Pile 4), the owner or operator shall employ measures to eliminate or minimize emissions. Such measures may include applying dust suppressant or covering the working face of Production Pile 4 (EU Pile 4).
 - a. The owner or operator shall develop a written plan to implement, at a minimum, measures to minimize emissions during high wind episodes (greater than 12 miles per hour).
 - i. The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.
- (9) The owner or operator shall only process wet material in Stackers Q2TP-24 to Q2TP-30.
 - a. The owner or operator shall develop a written plan to implement measures to ensure only wet material is processed in Stackers Q2TP-24 to Q2TP-30.
 - i. The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.
- B. The owner or operator shall comply with the applicable requirements in 40 CFR Part 60, Subpart OOO [*Standards of Performance for Nonmetallic Mineral Processing Plants* (§60.670 - §60.676)], including those not specifically mentioned in this permit.
 - (1) Per Table 3 to Subpart OOO of Part 60, the owner or operator shall monitor the water suppression system (CE Q2TP) associated Emission Units Q2TP-21, Q2TP-22, and Q2TP-23 as indicated below.
 - a. Per 40 CFR §60.674(b) of Subpart OOO, the owner or operator of any affected emission unit for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses wet suppression to control emissions from the affected emission unit shall perform monthly periodic inspections to check that water is flowing to discharge spray nozzles in the wet suppression system.
 - i. The owner or operator shall initiate corrective action within 24 hours and complete correction action as expeditiously as practical if the owner or operator finds that water is not flowing properly during an inspection of the water spray nozzles
 - 1. The owner or operator shall record each inspection of the water spray nozzles, including the date of each inspection and any corrective actions taken, in the logbook required under §60.676(b) of Subpart OOO.

- b. Per 40 CFR §60.674(b)(1) of Subpart OOO, if an affected emission unit relies on water carryover from upstream water sprays to control fugitive emissions, then that affected emission unit is exempt from the 5-year repeat testing requirement specified in Table 3 of Subpart OOO provided that the affected emission unit meets the following criteria:
 - i. The owner or operator of the affected emission unit conducts periodic inspections of the upstream water spray(s) that are responsible for controlling fugitive emissions from the affected emission unit.
 - ii. The owner or operator of the affected emission unit designates which upstream water spray(s) will be periodically inspected at the time of the initial performance test required under §60.11 of Subpart A and §60.675 of Subpart OOO.
 - c. Per 40 CFR §60.674(b)(2) of Subpart OOO, if an affected emission unit that routinely uses wet suppression water sprays ceases operation of the water sprays or is using a control mechanism to reduce fugitive emissions other than water sprays during the monthly inspection (for example, water from recent rainfall), the logbook entry required under §60.676(b) shall specify the control mechanism being used instead of water sprays.
- (2) The owner or operator shall comply with the applicable reporting and recordkeeping requirements in 40 CFR §60.676 of Subpart OOO.
-

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in this permit, any control equipment covered by this permit shall operate at all times when the emission unit(s) covered by this permit are in operation.

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
 - (2) This current amendment becomes void.
-

11. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

- (1) In accordance with 567 IAC 22.3(3)“b”, dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)“b” shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)“b”.
- (2) In accordance with 567 IAC 22.3(3)“f”, when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
- (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
- (4) Unless specified, in accordance with a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.

- B. The owner or operator shall furnish the Department with the following reports:
- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.
 - (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.
 - (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).
- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Table 9 – Permit History

Project No.	Permit No.	Description	Stack Testing	Issuance Date
18-017	18-A-113	Issue Permit to Unpermitted Top Plant and Established PM ₁₀ Emission Limits	No	09/06/2018

END OF PERMIT



Air Quality Construction Permit

Permit Number: 18-A-114-S1

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

563-324-1931
dosland@linwoodmining.com

401 E Front Street
Davenport, IA 52804

Permitted Equipment

Emission Point ID: Pile 1

Table 1 – Emission Unit(s) and Control Equipment:

EU ID	Description	Maximum Pile Area	Control Equipment Description and ID
Pile 1	Material Storage Pile 1	80,318 square feet	None

Equipment Location: 401 E Front Street
Davenport, IA 52804

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Table 2 – Project Issuance Information

Project Number	Project Description	Stack Testing	Issuance Date
22-153	Move Pile 11 to Permit 18-A-110-S1	No	12/08/2022

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

Table 3 – Emission Limits

EP	Pollutant	lbs/day ¹	tons/yr ²	Other Limits	Reference/Basis
Pile 1	Particulate Matter (PM) – State	NA	NA	NA	NA
	PM ₁₀	NA	NA	³	NA
	PM _{2.5}	NA	NA	NA	NA
	Opacity	NA	NA	⁴	567 IAC 23.3(2)"c"

¹ The emission limit is expressed in pounds per day.

² The emission limit is based on a twelve (12) month rolling total.

³ The limit for PM₁₀ controlled emissions for Pile 1 is established at 7.4 pounds of PM₁₀ per day. The PM₁₀ limit established for attainment and maintenance of PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the state implementation plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond lot line of the property.

2. Compliance Demonstration(s)

If an initial stack test is specified in the “Compliance Demonstration” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration” table unless another testing methodology is approved by the Department before testing.

Table 4 - Compliance Demonstrations

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	None	NA	1 hour	AP-42, Appendix C.1 Procedures for Sampling Surface/Bulk Dust Loading, Appendix C.2 Procedures for Laboratory Analysis of Surface/Bulk Dust Loading Samples
PM ₁₀	Active Surface Silt & Moisture Sampling	Quarterly	1 hour	
PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 25.1(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the stack tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed in the table below.

Table 5 – Emission Point Parameters

Parameter	Value
Stack Height (feet from the ground)	NA
Discharge Style	NA
Stack Outlet Dimensions (inches)	NA
Exhaust Temperature (°F)	NA
Exhaust Flowrate (scfm)	NA

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

This emission unit is not subject to any New Source Performance Standard (NSPS). There are no applicable subparts for this source category.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

This emission unit is not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by this permit shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The owner or operator shall maintain the total area of Pile 1 to less than or equal to 80,318 square feet.
 - i. The owner or operator shall maintain annual records of Pile 1 area in square feet.
- B. The average active surface moisture content for the material storage pile 1 shall be greater than or equal to 1.2% by weight.
 - i. The owner or operator shall sample the active surface of storage pile 1 to determine moisture content as percent by weight once per calendar quarter.
 - ii. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
 - iii. The owner or operator shall determine the average moisture content as percent by weight for all samples taken per calendar quarter.
 - iv. On quarterly basis, the owner or operator shall maintain the following records for each sampling event a) The date of the sample; b) The sample location; c) The measured moisture content as percent weight d); The average moisture content as percent by weight and e) The operator's initials.
 - v. If the measured moisture content is below the minimum value, the owner or operator shall take immediate corrective action measures to add moisture to the working face of the pile. Such measures shall include applying dust suppressant or water to the working face of the pile. The owner or operator shall maintain a record of all corrective actions taken. The owner or operator shall continue corrective measures until the measured moisture content is returned above the minimum value.
- C. The average active surface silt from the material storage pile 1 shall be less than or equal to 0.23% by weight.
 - i. The owner or operator shall sample the active surface of storage pile 1 to determine silt content as percent by weight once per calendar quarter.
 - ii. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
 - iii. The owner or operator shall determine the average silt content as percent by weight for all samples taken per calendar quarter.
 - iv. On quarterly basis, the owner or operator shall maintain the following records for each sampling event a) The date of the sample; b) The sample location; c) The measured silt content as percent weight d); The average silt content as percent by weight and e) The operator's initials.
- D. During high wind episodes (greater than 12 miles per hour) if visible emissions are observed from the working face of Pile 1, the owner or operator shall employ measures to eliminate or minimize emissions. Such measures may include applying dust suppressant to working face of the pile or covering the working face of the pile.
 - i. The owner or operator shall develop a written plan to implement, at a minimum, measures to minimize emissions during high wind episodes as specified in condition 5.D. The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in this permit, any control equipment covered by this permit shall operate at all times when the emission unit(s) covered by this permit are in operation.

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
- (2) This current amendment becomes void.

11. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 24.1(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

- A. The owner or operator shall furnish the Department the following written notifications:
- (1) In accordance with 567 IAC 22.3(3)“b”:
 - a. The date construction, installation, or alteration is initiated postmarked within 30 days following initiation of construction, installation, or alteration.
 - b. The actual date of startup, postmarked within 15 days following the start of operation.
 - (2) In accordance with 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
 - (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
 - (4) Unless specified, in accordance with a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than thirty 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.
- If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.
- B. The owner or operator shall furnish the Department with the following reports:
- (1) In accordance with 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) In accordance with 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.
 - (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
 - (4) In accordance with 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) In accordance with 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).

- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
502 E. 9th St.
Des Moines, IA 50319
Telephone: (515) 725-8200
Fax: (515) 725-9501

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Table 6 – Permit History

Permit No.	Project No.	Description	Date	Stack Testing
18-A-114	18-017	Issue new permit for material storage piles & Establish PM10 Limits	09/06/18	No

END OF PERMIT



Air Quality Construction Permit

Permit Number: 18-A-115

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

563-324-1931
dosland@linwoodmining.com

401 E Front Street
Davenport, IA 52761

Permitted Equipment

Emission Point ID: Pile 8

Emission Unit(s) and Control Equipment:

Material Storage Pile 8

Equipment Location: 401 E Front Street
Davenport, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Project Number	Project Description	Stack Testing	Issuance Date
18-017	Issue new permit for material storage piles & Establish PM10 Limits	No	09/06/18

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

EP	Pollutant	lbs/day ¹	tons/yr ²	Other Limits	Reference/Basis
Pile 8	Particulate Matter (PM) – State	NA	NA	NA	NA
	PM ₁₀	NA	NA	³	NA
	PM _{2.5}	NA	NA	NA	NA
	Opacity	NA	NA	⁴	567 IAC 23.3(2)“c”

¹ The emission limit is expressed in pounds per day.

² The emission limit is based on a twelve (12) month rolling total.

³ The limit for PM₁₀ controlled emissions for Pile 8 is established at 3.82 pounds of PM₁₀ per day. The PM₁₀ limit established for attainment and maintenance of PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the state implementation plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond lot line of the property.

2. Compliance Demonstration(s)

Compliance Demonstration Table

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)“a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the

owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height (feet from the ground)	NA
Discharge Style	NA
Stack Outlet Dimensions (inches)	NA
Exhaust Temperature (°F)	NA
Exhaust Flowrate (scfm)	NA

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

This emission unit is not subject to any New Source Performance Standard (NSPS). There are no applicable subparts for this source category.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

This emission unit is not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The owner or operator shall maintain the total area of Pile 8 to less than or equal to 183,860 square feet.
 - i. The owner or operator shall maintain annual records of Pile 8 area in square feet.
- B. The owner or operator shall store washed rocks only in Pile 8.
 - i. The owner or operator shall maintain records of type of rock stored in Pile 8.

- C. During high wind episodes (greater than 12 miles per hour) if visible emissions are observed from the working face of Pile 8, the owner or operator shall employ measures to eliminate or minimize emissions. Such measures may include applying dust suppressant to working face of the pile or coverings the working face of the pile.
- i. The owner or operator shall develop a written plan to implement at a minimum measures to minimize emissions during high wind episodes as specified in condition 5.C. The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.

6. Continuous Emission Monitoring Systems (CEMS)

Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
- (2) This current amendment becomes void.

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

- (1) Per 567 IAC 22.3(3)"b":
 - (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
 - (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
- (2) Per 567 IAC 22.3(3)"f," when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - (b) At least seven (7) days before equipment relocation.
- (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
- (4) Unless specified per a federal regulation, the owner or the owner's authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission

monitor [567 IAC 25.1(7)]. The notification shall include:

- The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:

- (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
- (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.
- (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
- (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.
- (5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 725-9549 Fax: (515) 725-9502	Field Office 6 1023 West Madison Washington, IA 52353 Telephone: (319) 653-2135 Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Permit No.	Project No.	Description	Date	Stack Testing

END OF PERMIT



Air Quality Construction Permit

Permit Number: 18-A-116-S2

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:

Darin Osland
Environmental Manager

Responsible Party:

Same

(563) 324-1391, Ext. 1140

dosland@linwoodmining.com

401 E Front St
Davenport, IA 52804

Permitted Equipment

Emission Point ID: EP Pile 14

Table 1 – Emission Unit(s) and Control Equipment

EU ID	Description	Operating Capacity	Control Equipment Description and ID
EU Pile 14	Material Storage Pile 14 (419,193 square feet)	140,000 tons/year	None

Equipment Location: 401 E Front Street
Davenport, Iowa 52804

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Table 2 – Project Issuance Information

Project Number	Project Description	Stack Testing	Issuance Date
25-225	Increase Pile 14 Area and Modify Emission Limits	No	12/10/2025

Under the Direction of the Director of the
Department of Natural Resources

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

Table 3 – Emission Limits

Pollutant	lb/day	Other Limits	Reference/Basis
Particulate Matter (PM) – State	14.21 ¹	NA	NA
PM ₁₀	6.72 ^{1,2}	NA	NAAQS
PM _{2.5}	1.01 ¹	NA	NA
Opacity	NA	See Footnote 3	567 IAC 23.3(2)“c”

¹ Established in Project Number 25-225 to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability. The emission limit is based on a maximum silt content of 1.04 percent and a minimum moisture content of 1.3 percent for Material Storage Pile 14.

² Established in Project Number 25-225 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

³ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property.

2. Compliance Demonstration(s)

If an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

Table 4 - Compliance Demonstrations

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	Storage Pile 14 Active Surface Silt and Moisture Sampling	Quarterly	NA	AP-42, Appendix C.1 and Appendix C.2 ¹
	Recordkeeping	See Footnote 2	NA	NA
	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M Method 202
PM ₁₀	Storage Pile 14 Active Surface Silt and Moisture Sampling	Quarterly	NA	AP-42, Appendix C.1 and Appendix C.2 ¹
	Recordkeeping	See Footnote 1	NA	NA
	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
PM _{2.5}	Storage Pile 14 Active Surface Silt and Moisture Sampling	Quarterly	NA	AP-42, Appendix C.1 and Appendix C.2 ¹
	Recordkeeping	See Footnote 1	NA	NA
	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

¹ Silt load testing shall be conducted according to the procedures outlined in AP-42, Appendix C.1 (*Procedures for Sampling Surface/Bulk Dust Loading*) and C.2 (*Procedures for Laboratory Analysis of Surface/Bulk Dust Loading Samples*).

² See Permit Condition 5 for the required recordkeeping requirements.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 21.10(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department for review no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.

- (2) A representative of the Department shall be permitted to witness the tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed in the table below.

Table 5 – Emission Point Parameters

Parameter	Value
Stack Height (feet from the ground)	*
Discharge Style	*
Stack Outlet Dimensions (inches)	*
Exhaust Temperature (°F)	*
Exhaust Flowrate (scfm)	*

**There is no physical stack associated with Material Storage Pile 14. Fugitive emissions are generated when the working face of Pile 14 is disturbed during facility normal operation.*

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

- (1) Material Storage Pile 14 (EU Pile 14) is not an affected emission unit under the federal standards of performance for new stationary sources, as defined in Title 40 of the Code of Federal Regulations (CFR), because there are no applicable categories at this time.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (1) Material Storage Pile 14 (EU Pile 14) is not an affected emission unit under the federal standards for emission of hazardous air pollutants for source categories, as defined in 40 CFR Part 63, because there are no applicable categories at this time.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by this permit shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

A. The owner or operator shall operate Material Storage Pile 14 (EU Pile 14) as follows:

- (1) Whenever Material Storage Pile 14 (EU Pile 14) is operating, the owner or operator shall take reasonable precautions to prevent the discharge beyond the lot line of the property. Reasonable precautions include, but are not limited to:
 - a. The installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials.
 - b. The use, where practical, of water or chemicals for control of dusts.
- (2) The throughput for Material Storage Pile 14 (EU Pile 14) shall not exceed 140,000 tons of limestone per 12-month rolling period.
 - a. The owner or operator shall install equipment necessary to monitor the throughput for Material Storage Pile 14 (EU Pile 14). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile 14 (EU Pile 14) on a monthly basis.
 - c. The owner or operator shall calculate and record the total limestone throughput, in tons, for Material Storage Pile 14 (EU Pile 14) on a rolling 12-month basis.

- (3) The maximum area for Material Storage Pile 14 (EU Pile 14) shall not exceed 419,193 square feet.
- a. The owner or operator shall maintain annual records of the Material Storage Pile 14 (EU Pile 14) area, in square feet.
- (4) The average active surface moisture content for Material Storage Pile 14 (EU Pile 14) shall be greater than or equal to 1.3 percent by weight.
- a. The owner or operator shall sample the active surface of Material Storage Pile 14 (EU Pile 14) to determine moisture content as percent by weight once per calendar quarter.
 - b. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
 - c. The owner or operator shall determine the average moisture content as percent by weight for all samples taken per calendar quarter.
 - d. On a quarterly basis, the owner or operator shall maintain the following records for each sampling event:
 1. The date of the sample;
 2. The sample location;
 3. The measured moisture content as percent by weight;
 4. The average moisture content as percent by weight; and
 5. The operator's initials.
- (5) The average active surface silt content for Material Storage Pile 14 (EU Pile 14) shall be less than or equal to 1.04 percent by weight.
- a. The owner or operator shall sample the active surface of Material Storage Pile 14 (EU Pile 14) to determine silt content as percent by weight once per calendar quarter.
 - b. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
 - c. The owner or operator shall determine the average silt content as percent by weight for all samples taken per calendar quarter.
 - d. On a quarterly basis, the owner or operator shall maintain the following records for each sampling event:
 1. The date of the sample;
 2. The sample location;
 3. The measured silt content as percent by weight;
 4. The average silt content as percent by weight; and
 5. The operator's initials.

- (6) During high wind episodes (greater than 12 miles per hour), if visible emissions are observed from the working face of Material Storage Pile 14 (EU Pile 14), the owner or operator shall employ measures to eliminate or minimize emissions. Such measures may include applying dust suppressant or covering the working face of Material Storage Pile 14 (EU Pile 14).
 - a. The owner or operator shall develop a written plan to implement, at a minimum, measures to minimize emissions during high wind episodes (greater than 12 miles per hour).
 - i. The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.
-

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in this permit, any control equipment covered by this permit shall operate at all times when the emission unit(s) covered by this permit are in operation.

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
 - (2) This current amendment becomes void.
-

11. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

- (1) In accordance with 567 IAC 22.3(3)“b”, dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)“b” shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)“b”.
- (2) In accordance with 567 IAC 22.3(3)“f”, when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
- (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
- (4) Unless specified, in accordance with a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.

B. The owner or operator shall furnish the Department with the following reports:

- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
- (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.
- (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.

- (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
- (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).
- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Table 7 – Permit History

Project No.	Permit No.	Description	Stack Testing	Issuance Date
18-017	18-A-116	Issue new permit for Material Storage Pile 14 and Establish PM ₁₀ Emission Limits	No	09/06/2018
22-153	18-A-116-S1	Change Emission Rate and Moisture Content	No	12/08/2022

END OF PERMIT



Air Quality Construction Permits Collection of Air Permits

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:

Darin Osland
Environmental Manager

Responsible Party:

Same

(563) 324-1391, Ext. 1140
dosland@linwoodmining.com

401 E Front St
Davenport, IA 52804

Project/Process Description

Pile A System

Equipment Location: 401 E Front Street
Davenport, Iowa 52804

Project Number: 25-225

Project Description: Update equipment list; Reduce annual throughput for Material Storage Piles E and H; Correct designation for Kiln 4 and Kiln 3 conveyors and issue individual permits to these units; and Modify emission limits.

Date: December 10, 2025

The permits in this document are issued in accordance with 567 Iowa Administrative Code Chapter 22, and are issued subject to the terms and conditions contained in this document. Issuance of the permits in this document shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law. If any permit contained in this document is modified, superseded, expires, or for any other reason changes or ceases to exist, the status of that permit shall not affect the validity or enforceability of any other permit contained in this document.

Under the Direction of the Director of the
Department of Natural Resources

**Table 1.A - List of Emission Units and Control Measures for Emission Point Pile A
Permit No. 18-A-117-S3**

**Table 1.A.1
Material Storage Piles**

EU ID	Total Area (ft ²)	Active Working Face* (ft ²)	Throughput (tpy)	Load In/Load out (Moisture %)	Wind Erosion (Silt Content %)	Control (Load In, % Reduction)	Control (Load Out, % Reduction)
EU Pile Barge	244,618	12,231	600,000	2.0	3.9	None	None
EU Pile B	131,097	6,555	650,000	0.5	0.56	Wind Screen (50%) (CE PileB1)	None
EU Pile E	240,554	12,028	50,000	1.5	3.95	Wind Screen (50%) (CE PileE)	None
EU Pile H	116,627	5,831	10,000	2.1	3.9	No Load In	None

*Active working face is 5 percent of pile total area.

**Table 1.A.2
Conveyors**

EU ID	Emission Unit Description	Maximum Rated Capacity	CE Description and ID	Stack Testing
EU LP-30	Kiln 4 Conveyor	50.31 tons/hour	None	No
EU LP-34	Kiln 3 Conveyor	43.13 tons/hour	None	No
EU TP20-CAM	TP20 CAM Span Belt Stacker	500 tons/hour	None	No
EU TP21-CAM	TP21 CAM Span Belt Stacker	500 tons/hour	None	No

**Table 2.B - List of Emission Units, Control Equipment, Emission Points, and Permits
Kiln Screeners**

EP ID	EU ID	Emission Unit Description	Maximum Rated Capacity	CE Description and ID	Stack Testing	Permit Number
EP LP-29	EP LP-29	Kiln 4 Screener	50.31 tons/year	Building Enclosure (95%) (CE LP-29)	No	25-A-232
EP LP-35	EP LP-35	Kiln 3 Screener	43.13 tons/year	Building Enclosure (95%) (CE LP-35)	No	25-A-233

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in any permit contained in this “Collection of Air Permits.”

A. The following emission limits shall not be exceeded per emission point:

Table 2 - Emission Point Specific Emission Limits

EP ID	Pollutant	lb/day	Other Limits	Reference/Basis
EP Pile A	Particulate Matter (PM) – State	71.50 ¹	NA	NA
	PM ₁₀	32.84 ^{1,2}	NA	NAAQS
	PM _{2.5}	5.65 ¹	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“c”
EP LP-29	Particulate Matter (PM) – State	1.81 ⁴	NA	NA
	PM ₁₀	0.58 ^{4,2}	NA	NAAQS
	PM _{2.5}	0.23 ⁴	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“d”
EP LP-35	Particulate Matter (PM) – State	1.55 ⁴	NA	NA
	PM ₁₀	0.50 ^{4,2}	NA	NAAQS
	PM _{2.5}	0.19 ⁴	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“d”

¹ Established in Project Number 25-225, per facility’s request, to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability. The emission limit is based on each control efficiency, each maximum silt content, and each minimum moisture content for the material storage piles specified in Table 1.A.1.

² Established in Project Number 25-225 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

³ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property.

⁴ Established in Project Number 25-225, per facility’s request, to keep the project minor for purposes of the PSD applicability. The emission limit is based on a building enclosure efficiency of 95 percent.

2. Compliance Demonstration(s)

For each Emission Point listed in the “Compliance Demonstrations” table, if an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

**Table 3.A - Compliance Demonstrations
(Emission Units Pile Barge, Pile B, and Pile E)**

EU ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EU Pile Barge EU Pile B EU Pile E	PM – State	Active Surface Silt and Moisture Sampling	Quarterly		AP-42, Appendix C.1 and Appendix C.2 ¹
		Recordkeeping	See Footnote 2	NA	NA
		None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
	PM ₁₀	Active Surface Silt and Moisture Sampling	Quarterly		AP-42, Appendix C.1 and Appendix C.2 ¹
		Recordkeeping	See Footnote 2	NA	NA
		None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	PM _{2.5}	Active Surface Silt and Moisture Sampling	Quarterly		AP-42, Appendix C.1 and Appendix C.2 ¹
		Recordkeeping	See Footnote 2	NA	NA
		None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

¹ Silt load testing shall be conducted according to the procedures outlined in AP-42, Appendix C.1 (*Procedures for Sampling Surface/Bulk Dust Loading*) and C.2 (*Procedures for Laboratory Analysis of Surface/Bulk Dust Loading Samples*).

² See Permit Condition 5 for the required recordkeeping requirements.

Table 4.B - Compliance Demonstrations
(Emission Units Pile H, LP-29, LP-30, LP-34, and LP-35)

EU ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EU Pile H EU LP-29	PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
EU LP-30	PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
EU LP-34 EU LP-35	PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 21.10(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department for review no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

The emission points shall conform to the specifications listed below:

Table 5 - Emission Point Characteristics

EP ID	Stack Height (feet)	Discharge Style	Stack Opening (inches)	Stack Temperature (°F)	Exhaust Flowrate (scfm)
EP Pile A	(1)	(1)	(1)	(1)	(1)
EP LP-29	(2)	(2)	(2)	(2)	(2)
EP LP-35	(2)	(2)	(2)	(2)	(2)

(1) *There is no physical stack associated with this emission point. Fugitive emissions are generated when the working face of Piles Barge, B, E, and H is disturbed during facility normal operation.*

(2) *The emission unit associated with this emission point is located inside a building enclosure.*

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

- (1) Material Storage Piles Barge, B, E, and H are not affected emission units under NSPS, because there are no applicable categories at this time.
- (2) The kiln screeners (EU LP-29 and EU LP-35) and the kiln conveyors (EU LP-30 and EU LP-34) are located at a facility that is subject to NSPS Subpart OOO (*Standards of Performance for Nonmetallic Mineral Processing Plants*). However, these units are not subject to this subpart, because they were constructed prior to the applicability date (after August 31, 1983) of Subpart OOO and they have not been modified or reconstructed since their initial construction.
- (3) The stackers (EU TP20-CAM and EU TP21-CAM) are located at a facility that is subject to NSPS Subpart OOO (*Standards of Performance for Nonmetallic Mineral Processing Plants*). However, these units are not subject to Subpart OOO, because they do not meet the definition of “transfer point” in §60.671 of Subpart OOO

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (1) This facility (Plant No. 82-01-015) is of the source category affected by 40 CFR Part 63, Subpart AAAAA (*National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants*). However, this facility is not subject to this subpart, because it has been determined under 40 CFR §63.7142 of Subpart AAAAA that this facility is a NESHAP area source.
- (2) Material Storage Piles Barge, B, E, and H are not affected emissions unit NESHAP, because there are no applicable categories at this time

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by these permits shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for these permits shall be:

- A. The owner or operator shall operate the material storage piles described in Table 1.A.1 and the processing units described in Tables 1.A.2 and 1.B as follows:
 - (1) Whenever any of the material storage piles described in Table 1.A.1 and the processing units described in Tables 1.A.2 and 1.B is operating, the owner or operator shall take reasonable precautions to prevent the discharge beyond the lot line of the property. Reasonable precautions include, but are not limited to:
 - a. The installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials.
 - b. The use, where practical, of water or chemicals for control of dusts.
 - (2) The owner or operator shall conduct visible emissions observations each time any of the processing units described in Table 1.A.2 is in operation. This requirement shall not apply on the days that none of the processing units described in Table 1.A.2 is operating.
 - a. The owner or operator shall record the date and time of the observation and the presence or absence of visible emission.
 - b. If visible emissions are observed, the owner or operator shall:
 - i. Investigate the emission unit or control equipment and make corrections to the associated operations or equipment.
 - ii. Maintain a record of all corrective actions taken.
 - (3) The maximum area for the material storage piles described in Table 1.A.1 shall not exceed 1,310,000 square feet, combined.
 - a. The owner or operator shall maintain annual records of the combined area, in square feet, for the material storage piles described in Table 1.A.1.

- (4) During high wind episodes (greater than 12 miles per hour), if visible emissions are observed from the working face of any of the material storage piles described in Table 1.A.1, the owner or operator shall employ measures to eliminate or minimize emissions. Such measures may include applying dust suppressant or covering the working face of the material storage pile.
 - a. The owner or operator shall develop a written plan to implement, at a minimum, measures to minimize emissions during high wind episodes (greater than 12 miles per hour).
 - i. The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.
- (5) The owner or operator shall maintain Material Storage Pile Barge (EU Pile Barge), Material Storage Pile B (EU Pile B), and Material Storage Pile E (EU Pile E) a minimum distance of 80 feet from the fence along Highway 22.
 - a. The owner or operator shall maintain records of the date when Material Storage Pile Barge (EU Pile Barge), Material Storage Pile B (EU Pile B), and Material Storage Pile E (EU Pile E) were moved 80 feet from the fence line along Highway 22.
 - b. The owner or operator shall maintain annual records of the distance from the fence line along Highway 22 for Material Storage Pile Barge (EU Pile Barge), Material Storage Pile B (EU Pile B), and Material Storage Pile E (EU Pile E).
- (6) The owner or operator shall maintain equipment to ensure 24-hour surveillance of all gaps in the property berm along the river boundaries. "No Trespassing" signs shall be posted at both ends of the gap in the property berm coverage to further restrict public access.
- (7) The owner or operator shall maintain a fence along all property lines except as specified in Permit Condition 5.A.(6) to restrict public access to the facility's property.
- (8) The owner or operator shall install and maintain signage to restrict public access from the landfill to Linwood property.

B. The owner or operator shall operate Material Storage Pile Barge (EU Pile Barge) as follows:

- (1) Material Storage Pile Barge (EU Pile Barge) is restricted to a maximum of 600,000 tons of limestone per 12-month rolling period.
 - a. The owner or operator shall install equipment necessary to monitor the throughput for Material Storage Pile Barge (EU Pile Barge). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile Barge (EU Pile Barge) on a monthly basis.
 - c. The owner or operator shall calculate and record the total limestone throughput, in tons, for Material Storage Pile Barge (EU Pile Barge) on a rolling 12-month basis.

(2) The average active surface moisture content for Material Storage Pile Barge (EU Pile Barge) shall be greater than or equal to 2.0 percent by weight.

- a. The owner or operator shall sample the active surface of Material Storage Pile Barge (EU Pile Barge) to determine moisture content as percent by weight once per calendar quarter.
- b. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
- c. The owner or operator shall determine the average moisture content as percent by weight for all samples taken per calendar quarter.
- d. On a quarterly basis, the owner or operator shall maintain the following records for each sampling event:
 1. The date of the sample;
 2. The sample location;
 3. The measured moisture content as percent by weight;
 4. The average moisture content as percent by weight; and
 5. The operator's initials.

(3) The average active surface silt content for Material Storage Pile Barge (EU Pile Barge) shall be less than or equal to 3.9 percent by weight.

- i. The owner or operator shall sample the active surface of Material Storage Pile Barge (EU Pile Barge) to determine silt content as percent by weight once per calendar quarter.
- ii. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
- iii. The owner or operator shall determine the average silt content as percent by weight for all samples taken per calendar quarter.

C. The owner or operator shall operate Material Storage Pile B (EU Pile B) as follows:

(1) The owner or operator shall install a Wind Screen (CE PileB1) on the load-in hoppers associated with Material Storage Pile B (EU Pile B).

- a. The owner or operator shall maintain a record of the date when installation of the Wind Screen (CE PileB1) was completed.
- b. The owner or operator shall maintain the Wind Screen (CE PileB1) in a manner to minimize emissions and achieve 50 percent reduction in emissions due to load-in of material from the hopper associated with Material Storage Pile B (EU Pile B). At a minimum, the Wind Screen (CE PileB1) shall be enclosed on three sides, at a height of 5 feet above the hopper and maintained in good working order.
 - i. The owner or operator shall develop an operating and maintenance plan for the Wind Screen (CE PileB1), including periodic inspections and a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.

- ii. The owner or operator shall maintain a record of all inspections and maintenance activities and any action resulting from the inspection and maintenance of the Wind Screen (CE PileB1).
- (2) Material Storage Pile B (EU Pile B) is restricted to a maximum throughput of 2,238 tons of limestone per calendar day.
 - a. The owner or operator shall install equipment necessary to monitor the throughput for Material Storage Pile B (EU Pile B). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile B (EU Pile B) for each calendar day.
- (3) Material Storage Pile B (EU Pile B) is restricted to a maximum throughput of 650,000 tons of limestone per 12-month rolling period.
 - a. The owner or operator shall install equipment necessary to monitor the throughput for Material Storage Pile B (EU Pile B). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile B (EU Pile B) on a monthly basis.
 - c. The owner or operator shall calculate and record the total limestone throughput, in tons, for Material Storage Pile B (EU Pile B) on a rolling 12-month basis.
- (5) The average active surface moisture content for Material Storage Pile B (EU Pile B) shall be greater than or equal to 0.5 percent by weight.
 - a. The owner or operator shall sample the active surface of Material Storage Pile B (EU Pile B) to determine moisture content as percent by weight once per calendar quarter.
 - b. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
 - c. The owner or operator shall determine the average moisture content as percent by weight for all samples taken per calendar quarter.

- d. On a quarterly basis, the owner or operator shall maintain the following records for each sampling event:
 - 1. The date of the sample;
 - 2. The sample location;
 - 3. The measured moisture content as percent by weight;
 - 4. The average moisture content as percent by weight; and
 - 5. The operator's initials.
- (6) The average active surface silt content for Material Storage Pile Be (EU Pile B) shall be less than or equal to 3.9 percent by weight.
 - a. The owner or operator shall sample the active surface of Material Storage Pile B (EU Pile B) to determine silt content as percent by weight once per calendar quarter.
 - b. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
 - c. The owner or operator shall determine the average silt content as percent by weight for all samples taken per calendar quarter.
- D. The owner or operator shall operate Material Storage Pile E (EU Pile E) as follows:
 - (1) The owner or operator shall install a Wind Screen (CE PileE) on the load-in hoppers associated with Material Storage Pile E (EU Pile E).
 - a. The owner or operator shall maintain a record of the date when installation of the Wind Screen (CE PileE) was completed.
 - b. The owner or operator shall maintain the Wind Screen (CE PileE) in a manner to minimize emissions and achieve 50 percent reduction in emissions due to load-in of material from the hopper associated with Material Storage Pile E (EU Pile E). At a minimum, the Wind Screen (CE PileE) shall be enclosed on three sides, at a height of 5 feet above the hopper and maintained in good working order.
 - i. The owner or operator shall develop an operating and maintenance plan for the Wind Screen (CE PileE), including periodic inspections and a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - ii. The owner or operator shall maintain a record of all inspections and maintenance activities and any action resulting from the inspection and maintenance of the Wind Screen (CE PileE).
 - (2) Material Storage Pile E (EU Pile E) is restricted to a maximum throughput of 2,640 tons of limestone per calendar day.
 - a. The owner or operator shall install equipment necessary to monitor the throughput for Material Storage Pile E (EU Pile E). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile E (EU Pile E) for each calendar day.

- (3) Material Storage Pile E (EU Pile E) is restricted to a maximum throughput of 50,000 tons of limestone per 12-month rolling period.
- a. The owner or operator shall install equipment necessary to monitor the throughput for Material Storage Pile E (EU Pile E). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile E (EU Pile E) on a monthly basis.
 - c. The owner or operator shall calculate and record the total limestone throughput, in tons, for Material Storage Pile E (EU Pile E) on a rolling 12-month basis.
- (4) The average active surface moisture content for Material Storage Pile E (EU Pile E) shall be greater than or equal to 1.5 percent by weight.
- a. The owner or operator shall sample the active surface of Material Storage Pile E (EU Pile E) to determine moisture content as percent by weight once per calendar quarter.
 - b. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
 - c. The owner or operator shall determine the average moisture content as percent by weight for all samples taken per calendar quarter.
 - d. On a quarterly basis, the owner or operator shall maintain the following records for each sampling event:
 1. The date of the sample;
 2. The sample location;
 3. The measured moisture content as percent by weight;
 4. The average moisture content as percent by weight; and
 5. The operator's initials.
- (5) The average active surface silt content for Material Storage Pile E (EU Pile E) shall be less than or equal to 3.95 percent by weight.
- a. The owner or operator shall sample the active surface of Material Storage Pile E (EU Pile E) to determine silt content as percent by weight once per calendar quarter.
 - b. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
 - c. The owner or operator shall determine the average silt content as percent by weight for all samples taken per calendar quarter.

- d. On a quarterly basis, the owner or operator shall maintain the following records for each sampling event:
 1. The date of the sample;
 2. The sample location;
 3. The measured silt content as percent by weight;
 4. The average silt content as percent by weight; and
 5. The operator's initials.
- E. The owner or operator shall maintain the Kiln 4 Screener (EU LP-29) inside a building enclosure (CE LP-29) to utilize 95 percent reduction of particulate emissions generated by the operation of these units.
 - (1) The owner or operator shall develop an operating and maintenance plan for the building enclosure, including periodic inspections and a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - (2) The owner or operator shall maintain a record of all inspections and maintenance activities and any action resulting from the inspection and maintenance of the building enclosure.
 - (3) The owner or operator shall conduct visible emissions observations, once per calendar day, on the building where the Kiln 4 Screener (EU LP-29) is located. This requirement shall not apply on the days that this unit is not operating.
 - a. The owner or operator shall record the date and time of the observation and the presence or absence of visible emission.
 - b. If visible emissions are observed, the owner or operator shall investigate the emission unit or control equipment and make corrections to the associated operations or equipment.
 - c. The owner or operator shall maintain a record of all corrective actions taken.
- F. The owner or operator shall maintain the Kiln 3 Screener (EU LP-35) inside a building enclosure (CE LP-35) to utilize 95 percent reduction of particulate emissions generated by the operation of these units.
 - (1) The owner or operator shall develop an operating and maintenance plan for the building enclosure, including periodic inspections and a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - (2) The owner or operator shall maintain a record of all inspections and maintenance activities and any action resulting from the inspection and maintenance of the building enclosure.
 - (3) The owner or operator shall conduct visible emissions observations, once per calendar day, on the building where the Kiln 3 Screener (EU LP-35) is located. This requirement shall not apply on the days that this unit is not operating.
 - a. The owner or operator shall record the date and time of the observation and the presence or absence of visible emission.
 - b. If visible emissions are observed, the owner or operator shall investigate the emission unit or control equipment and make corrections to the associated operations or equipment.
 - c. The owner or operator shall maintain a record of all corrective actions taken.

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Department Review

These permits are issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in these permits, any control equipment covered by these permits shall operate at all times when the emission unit(s) covered by these permits are in operation.

These permits are issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause the affected permit or permits to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

These permits are for the construction and operation of specific emission unit(s), control equipment, and emission point(s) as described in these permits and in the applications for these permits. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in these permits conform to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter any of the emission unit(s), or emission point(s), or the associated control equipment without the required amended permit(s).

Any owner or operator of the specified emission unit(s), emission point(s), or associated control equipment, including any person who becomes an owner or operator subsequent to the issuance date of the affected permit(s), is responsible for assuring that the installation, operation, and maintenance of the equipment listed in the permit(s) is in compliance with the provisions of the permit(s) and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, these permits are not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend the permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) The permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
- (2) This current amendment becomes void.

11. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

These requirements shall apply to each permit included in this "Collection of Air Permits" document.

- A. The owner or operator shall furnish the Department the following written notifications:
- (1) In accordance with 567 IAC 22.3(3)"b", dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)"b" shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)"b".
 - (2) In accordance with 567 IAC 22.3(3)"f", when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
 - (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
 - (4) Unless specified, in accordance with a federal regulation, the owner or the owner's authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.
- If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.
- B. The owner or operator shall furnish the Department with the following reports:
- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.
 - (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.
 - (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).

- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Table 6 – Permit History

Project No.	Permit No.	Description	Stack Testing	Issuance Date
18-017	18-A-117	Issue new Permit for Material Storage Piles; Establish PM ₁₀ Emission Limits	No	09/06/2018
18-366	18-A-117-S1	Update Pile Throughput; Enclose Units	No	03/14/2019
22-153	18-A-117-S2	Change Emission Rate, Moisture Content, and Throughput	No	12/08/2022
25-225	18-A-117-S3	Update Equipment List; Reduce Throughput for Piles E and H; and Modify Emission Limits	No	12/10/2025
	25-A-232	Issue new Permit to EU LP-29, previously permit under Permit No. 18-A-117-S2		
	25-A-233	Issue new Permit to EU LP-35, previously permit under Permit No. 18-A-117-S2		

END OF PERMIT



Air Quality Construction Permits Collection of Air Permits

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

(563) 324-1391, Ext. 1140
dosland@linwoodmining.com

401 E Front St
Davenport, IA 52804

Project/Process Description

Pile A System

Equipment Location: 401 E Front Street
Davenport, Iowa 52804

Project Number: 25-225

Project Description: Update equipment list; Reduce annual throughput for Material Storage Piles E and H; Correct designation for Kiln 4 and Kiln 3 conveyors and issue individual permits to these units; and Modify emission limits.

Date: December 10, 2025

The permits in this document are issued in accordance with 567 Iowa Administrative Code Chapter 22, and are issued subject to the terms and conditions contained in this document. Issuance of the permits in this document shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law. If any permit contained in this document is modified, superseded, expires, or for any other reason changes or ceases to exist, the status of that permit shall not affect the validity or enforceability of any other permit contained in this document.

Under the Direction of the Director of the
Department of Natural Resources

**Table 1.A - List of Emission Units and Control Measures for Emission Point Pile A
Permit No. 18-A-117-S3**

**Table 1.A.1
Material Storage Piles**

EU ID	Total Area (ft²)	Active Working Face* (ft²)	Throughput (tpy)	Load In/Load out (Moisture %)	Wind Erosion (Silt Content %)	Control (Load In, % Reduction)	Control (Load Out, % Reduction)
EU Pile Barge	244,618	12,231	600,000	2.0	3.9	None	None
EU Pile B	131,097	6,555	650,000	0.5	0.56	Wind Screen (50%) (CE PileB1)	None
EU Pile E	240,554	12,028	50,000	1.5	3.95	Wind Screen (50%) (CE PileE)	None
EU Pile H	116,627	5,831	10,000	2.1	3.9	No Load In	None

*Active working face is 5 percent of pile total area.

**Table 1.A.2
Conveyors**

EU ID	Emission Unit Description	Maximum Rated Capacity	CE Description and ID	Stack Testing
EU LP-30	Kiln 4 Conveyor	50.31 tons/hour	None	No
EU LP-34	Kiln 3 Conveyor	43.13 tons/hour	None	No
EU TP20-CAM	TP20 CAM Span Belt Stacker	500 tons/hour	None	No
EU TP21-CAM	TP21 CAM Span Belt Stacker	500 tons/hour	None	No

**Table 2.B - List of Emission Units, Control Equipment, Emission Points, and Permits
Kiln Screeners**

EP ID	EU ID	Emission Unit Description	Maximum Rated Capacity	CE Description and ID	Stack Testing	Permit Number
EP LP-29	EP LP-29	Kiln 4 Screener	50.31 tons/year	Building Enclosure (95%) (CE LP-29)	No	25-A-232
EP LP-35	EP LP-35	Kiln 3 Screener	43.13 tons/year	Building Enclosure (95%) (CE LP-35)	No	25-A-233

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in any permit contained in this “Collection of Air Permits.”

A. The following emission limits shall not be exceeded per emission point:

Table 2 - Emission Point Specific Emission Limits

EP ID	Pollutant	lb/day	Other Limits	Reference/Basis
EP Pile A	Particulate Matter (PM) – State	71.50 ¹	NA	NA
	PM ₁₀	32.84 ^{1,2}	NA	NAAQS
	PM _{2.5}	5.65 ¹	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“c”
EP LP-29	Particulate Matter (PM) – State	1.81 ⁴	NA	NA
	PM ₁₀	0.58 ^{4,2}	NA	NAAQS
	PM _{2.5}	0.23 ⁴	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“d”
EP LP-35	Particulate Matter (PM) – State	1.55 ⁴	NA	NA
	PM ₁₀	0.50 ^{4,2}	NA	NAAQS
	PM _{2.5}	0.19 ⁴	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“d”

¹ Established in Project Number 25-225, per facility’s request, to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability. The emission limit is based on each control efficiency, each maximum silt content, and each minimum moisture content for the material storage piles specified in Table 1.A.1.

² Established in Project Number 25-225 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

³ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property.

⁴ Established in Project Number 25-225, per facility’s request, to keep the project minor for purposes of the PSD applicability. The emission limit is based on a building enclosure efficiency of 95 percent.

2. Compliance Demonstration(s)

For each Emission Point listed in the “Compliance Demonstrations” table, if an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

**Table 3.A - Compliance Demonstrations
(Emission Units Pile Barge, Pile B, and Pile E)**

EU ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EU Pile Barge EU Pile B EU Pile E	PM – State	Active Surface Silt and Moisture Sampling	Quarterly		AP-42, Appendix C.1 and Appendix C.2 ¹
		Recordkeeping	See Footnote 2	NA	NA
		None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
	PM ₁₀	Active Surface Silt and Moisture Sampling	Quarterly		AP-42, Appendix C.1 and Appendix C.2 ¹
		Recordkeeping	See Footnote 2	NA	NA
		None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	PM _{2.5}	Active Surface Silt and Moisture Sampling	Quarterly		AP-42, Appendix C.1 and Appendix C.2 ¹
		Recordkeeping	See Footnote 2	NA	NA
		None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

¹ Silt load testing shall be conducted according to the procedures outlined in AP-42, Appendix C.1 (*Procedures for Sampling Surface/Bulk Dust Loading*) and C.2 (*Procedures for Laboratory Analysis of Surface/Bulk Dust Loading Samples*).

² See Permit Condition 5 for the required recordkeeping requirements.

Table 4.B - Compliance Demonstrations
(Emission Units Pile H, LP-29, LP-30, LP-34, and LP-35)

EU ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EU Pile H EU LP-29	PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
EU LP-30	PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
EU LP-34 EU LP-35	PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 21.10(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department for review no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

The emission points shall conform to the specifications listed below:

Table 5 - Emission Point Characteristics

EP ID	Stack Height (feet)	Discharge Style	Stack Opening (inches)	Stack Temperature (°F)	Exhaust Flowrate (scfm)
EP Pile A	(1)	(1)	(1)	(1)	(1)
EP LP-29	(2)	(2)	(2)	(2)	(2)
EP LP-35	(2)	(2)	(2)	(2)	(2)

⁽¹⁾ *There is no physical stack associated with this emission point. Fugitive emissions are generated when the working face of Piles Barge, B, E, and H is disturbed during facility normal operation.*

⁽²⁾ *The emission unit associated with this emission point is located inside a building enclosure.*

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

- (1) Material Storage Piles Barge, B, E, and H are not affected emission units under NSPS, because there are no applicable categories at this time.
- (2) The kiln screeners (EU LP-29 and EU LP-35) and the kiln conveyors (EU LP-30 and EU LP-34) are located at a facility that is subject to NSPS Subpart OOO (*Standards of Performance for Nonmetallic Mineral Processing Plants*). However, these units are not subject to this subpart, because they were constructed prior to the applicability date (after August 31, 1983) of Subpart OOO and they have not been modified or reconstructed since their initial construction.
- (3) The stackers (EU TP20-CAM and EU TP21-CAM) are located at a facility that is subject to NSPS Subpart OOO (*Standards of Performance for Nonmetallic Mineral Processing Plants*). However, these units are not subject to Subpart OOO, because they do not meet the definition of “transfer point” in §60.671 of Subpart OOO

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (1) This facility (Plant No. 82-01-015) is of the source category affected by 40 CFR Part 63, Subpart AAAAA (*National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants*). However, this facility is not subject to this subpart, because it has been determined under 40 CFR §63.7142 of Subpart AAAAA that this facility is a NESHAP area source.
- (2) Material Storage Piles Barge, B, E, and H are not affected emissions unit NESHAP, because there are no applicable categories at this time

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by these permits shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for these permits shall be:

- A. The owner or operator shall operate the material storage piles described in Table 1.A.1 and the processing units described in Tables 1.A.2 and 1.B as follows:
 - (1) Whenever any of the material storage piles described in Table 1.A.1 and the processing units described in Tables 1.A.2 and 1.B is operating, the owner or operator shall take reasonable precautions to prevent the discharge beyond the lot line of the property. Reasonable precautions include, but are not limited to:
 - a. The installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials.
 - b. The use, where practical, of water or chemicals for control of dusts.
 - (2) The owner or operator shall conduct visible emissions observations each time any of the processing units described in Table 1.A.2 is in operation. This requirement shall not apply on the days that none of the processing units described in Table 1.A.2 is operating.
 - a. The owner or operator shall record the date and time of the observation and the presence or absence of visible emission.
 - b. If visible emissions are observed, the owner or operator shall:
 - i. Investigate the emission unit or control equipment and make corrections to the associated operations or equipment.
 - ii. Maintain a record of all corrective actions taken.
 - (3) The maximum area for the material storage piles described in Table 1.A.1 shall not exceed 1,310,000 square feet, combined.
 - a. The owner or operator shall maintain annual records of the combined area, in square feet, for the material storage piles described in Table 1.A.1.

- (4) During high wind episodes (greater than 12 miles per hour), if visible emissions are observed from the working face of any of the material storage piles described in Table 1.A.1, the owner or operator shall employ measures to eliminate or minimize emissions. Such measures may include applying dust suppressant or covering the working face of the material storage pile.
 - a. The owner or operator shall develop a written plan to implement, at a minimum, measures to minimize emissions during high wind episodes (greater than 12 miles per hour).
 - i. The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.
- (5) The owner or operator shall maintain Material Storage Pile Barge (EU Pile Barge), Material Storage Pile B (EU Pile B), and Material Storage Pile E (EU Pile E) a minimum distance of 80 feet from the fence along Highway 22.
 - a. The owner or operator shall maintain records of the date when Material Storage Pile Barge (EU Pile Barge), Material Storage Pile B (EU Pile B), and Material Storage Pile E (EU Pile E) were moved 80 feet from the fence line along Highway 22.
 - b. The owner or operator shall maintain annual records of the distance from the fence line along Highway 22 for Material Storage Pile Barge (EU Pile Barge), Material Storage Pile B (EU Pile B), and Material Storage Pile E (EU Pile E).
- (6) The owner or operator shall maintain equipment to ensure 24-hour surveillance of all gaps in the property berm along the river boundaries. "No Trespassing" signs shall be posted at both ends of the gap in the property berm coverage to further restrict public access.
- (7) The owner or operator shall maintain a fence along all property lines except as specified in Permit Condition 5.A.(6) to restrict public access to the facility's property.
- (8) The owner or operator shall install and maintain signage to restrict public access from the landfill to Linwood property.

B. The owner or operator shall operate Material Storage Pile Barge (EU Pile Barge) as follows:

- (1) Material Storage Pile Barge (EU Pile Barge) is restricted to a maximum of 600,000 tons of limestone per 12-month rolling period.
 - a. The owner or operator shall install equipment necessary to monitor the throughput for Material Storage Pile Barge (EU Pile Barge). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile Barge (EU Pile Barge) on a monthly basis.
 - c. The owner or operator shall calculate and record the total limestone throughput, in tons, for Material Storage Pile Barge (EU Pile Barge) on a rolling 12-month basis.

(2) The average active surface moisture content for Material Storage Pile Barge (EU Pile Barge) shall be greater than or equal to 2.0 percent by weight.

- a. The owner or operator shall sample the active surface of Material Storage Pile Barge (EU Pile Barge) to determine moisture content as percent by weight once per calendar quarter.
- b. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
- c. The owner or operator shall determine the average moisture content as percent by weight for all samples taken per calendar quarter.
- d. On a quarterly basis, the owner or operator shall maintain the following records for each sampling event:
 1. The date of the sample;
 2. The sample location;
 3. The measured moisture content as percent by weight;
 4. The average moisture content as percent by weight; and
 5. The operator's initials.

(3) The average active surface silt content for Material Storage Pile Barge (EU Pile Barge) shall be less than or equal to 3.9 percent by weight.

- i. The owner or operator shall sample the active surface of Material Storage Pile Barge (EU Pile Barge) to determine silt content as percent by weight once per calendar quarter.
- ii. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
- iii. The owner or operator shall determine the average silt content as percent by weight for all samples taken per calendar quarter.

C. The owner or operator shall operate Material Storage Pile B (EU Pile B) as follows:

(1) The owner or operator shall install a Wind Screen (CE PileB1) on the load-in hoppers associated with Material Storage Pile B (EU Pile B).

- a. The owner or operator shall maintain a record of the date when installation of the Wind Screen (CE PileB1) was completed.
- b. The owner or operator shall maintain the Wind Screen (CE PileB1) in a manner to minimize emissions and achieve 50 percent reduction in emissions due to load-in of material from the hopper associated with Material Storage Pile B (EU Pile B). At a minimum, the Wind Screen (CE PileB1) shall be enclosed on three sides, at a height of 5 feet above the hopper and maintained in good working order.
 - i. The owner or operator shall develop an operating and maintenance plan for the Wind Screen (CE PileB1), including periodic inspections and a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.

- ii. The owner or operator shall maintain a record of all inspections and maintenance activities and any action resulting from the inspection and maintenance of the Wind Screen (CE PileB1).
- (2) Material Storage Pile B (EU Pile B) is restricted to a maximum throughput of 2,238 tons of limestone per calendar day.
 - a. The owner or operator shall install equipment necessary to monitor the throughput for Material Storage Pile B (EU Pile B). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile B (EU Pile B) for each calendar day.
- (3) Material Storage Pile B (EU Pile B) is restricted to a maximum throughput of 650,000 tons of limestone per 12-month rolling period.
 - a. The owner or operator shall install equipment necessary to monitor the throughput for Material Storage Pile B (EU Pile B). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile B (EU Pile B) on a monthly basis.
 - c. The owner or operator shall calculate and record the total limestone throughput, in tons, for Material Storage Pile B (EU Pile B) on a rolling 12-month basis.
- (5) The average active surface moisture content for Material Storage Pile B (EU Pile B) shall be greater than or equal to 0.5 percent by weight.
 - a. The owner or operator shall sample the active surface of Material Storage Pile B (EU Pile B) to determine moisture content as percent by weight once per calendar quarter.
 - b. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
 - c. The owner or operator shall determine the average moisture content as percent by weight for all samples taken per calendar quarter.

- d. On a quarterly basis, the owner or operator shall maintain the following records for each sampling event:
 - 1. The date of the sample;
 - 2. The sample location;
 - 3. The measured moisture content as percent by weight;
 - 4. The average moisture content as percent by weight; and
 - 5. The operator's initials.
- (6) The average active surface silt content for Material Storage Pile Be (EU Pile B) shall be less than or equal to 3.9 percent by weight.
 - a. The owner or operator shall sample the active surface of Material Storage Pile B (EU Pile B) to determine silt content as percent by weight once per calendar quarter.
 - b. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
 - c. The owner or operator shall determine the average silt content as percent by weight for all samples taken per calendar quarter.
- D. The owner or operator shall operate Material Storage Pile E (EU Pile E) as follows:
 - (1) The owner or operator shall install a Wind Screen (CE PileE) on the load-in hoppers associated with Material Storage Pile E (EU Pile E).
 - a. The owner or operator shall maintain a record of the date when installation of the Wind Screen (CE PileE) was completed.
 - b. The owner or operator shall maintain the Wind Screen (CE PileE) in a manner to minimize emissions and achieve 50 percent reduction in emissions due to load-in of material from the hopper associated with Material Storage Pile E (EU Pile E). At a minimum, the Wind Screen (CE PileE) shall be enclosed on three sides, at a height of 5 feet above the hopper and maintained in good working order.
 - i. The owner or operator shall develop an operating and maintenance plan for the Wind Screen (CE PileE), including periodic inspections and a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - ii. The owner or operator shall maintain a record of all inspections and maintenance activities and any action resulting from the inspection and maintenance of the Wind Screen (CE PileE).
 - (2) Material Storage Pile E (EU Pile E) is restricted to a maximum throughput of 2,640 tons of limestone per calendar day.
 - a. The owner or operator shall install equipment necessary to monitor the throughput for Material Storage Pile E (EU Pile E). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile E (EU Pile E) for each calendar day.

- (3) Material Storage Pile E (EU Pile E) is restricted to a maximum throughput of 50,000 tons of limestone per 12-month rolling period.
- a. The owner or operator shall install equipment necessary to monitor the throughput for Material Storage Pile E (EU Pile E). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile E (EU Pile E) on a monthly basis.
 - c. The owner or operator shall calculate and record the total limestone throughput, in tons, for Material Storage Pile E (EU Pile E) on a rolling 12-month basis.
- (4) The average active surface moisture content for Material Storage Pile E (EU Pile E) shall be greater than or equal to 1.5 percent by weight.
- a. The owner or operator shall sample the active surface of Material Storage Pile E (EU Pile E) to determine moisture content as percent by weight once per calendar quarter.
 - b. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
 - c. The owner or operator shall determine the average moisture content as percent by weight for all samples taken per calendar quarter.
 - d. On a quarterly basis, the owner or operator shall maintain the following records for each sampling event:
 1. The date of the sample;
 2. The sample location;
 3. The measured moisture content as percent by weight;
 4. The average moisture content as percent by weight; and
 5. The operator's initials.
- (5) The average active surface silt content for Material Storage Pile E (EU Pile E) shall be less than or equal to 3.95 percent by weight.
- a. The owner or operator shall sample the active surface of Material Storage Pile E (EU Pile E) to determine silt content as percent by weight once per calendar quarter.
 - b. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
 - c. The owner or operator shall determine the average silt content as percent by weight for all samples taken per calendar quarter.

- d. On a quarterly basis, the owner or operator shall maintain the following records for each sampling event:
 1. The date of the sample;
 2. The sample location;
 3. The measured silt content as percent by weight;
 4. The average silt content as percent by weight; and
 5. The operator's initials.
- E. The owner or operator shall maintain the Kiln 4 Screener (EU LP-29) inside a building enclosure (CE LP-29) to utilize 95 percent reduction of particulate emissions generated by the operation of these units.
 - (1) The owner or operator shall develop an operating and maintenance plan for the building enclosure, including periodic inspections and a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - (2) The owner or operator shall maintain a record of all inspections and maintenance activities and any action resulting from the inspection and maintenance of the building enclosure.
 - (3) The owner or operator shall conduct visible emissions observations, once per calendar day, on the building where the Kiln 4 Screener (EU LP-29) is located. This requirement shall not apply on the days that this unit is not operating.
 - a. The owner or operator shall record the date and time of the observation and the presence or absence of visible emission.
 - b. If visible emissions are observed, the owner or operator shall investigate the emission unit or control equipment and make corrections to the associated operations or equipment.
 - c. The owner or operator shall maintain a record of all corrective actions taken.
- F. The owner or operator shall maintain the Kiln 3 Screener (EU LP-35) inside a building enclosure (CE LP-35) to utilize 95 percent reduction of particulate emissions generated by the operation of these units.
 - (1) The owner or operator shall develop an operating and maintenance plan for the building enclosure, including periodic inspections and a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - (2) The owner or operator shall maintain a record of all inspections and maintenance activities and any action resulting from the inspection and maintenance of the building enclosure.
 - (3) The owner or operator shall conduct visible emissions observations, once per calendar day, on the building where the Kiln 3 Screener (EU LP-35) is located. This requirement shall not apply on the days that this unit is not operating.
 - a. The owner or operator shall record the date and time of the observation and the presence or absence of visible emission.
 - b. If visible emissions are observed, the owner or operator shall investigate the emission unit or control equipment and make corrections to the associated operations or equipment.
 - c. The owner or operator shall maintain a record of all corrective actions taken.

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Department Review

These permits are issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in these permits, any control equipment covered by these permits shall operate at all times when the emission unit(s) covered by these permits are in operation.

These permits are issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause the affected permit or permits to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

These permits are for the construction and operation of specific emission unit(s), control equipment, and emission point(s) as described in these permits and in the applications for these permits. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in these permits conform to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter any of the emission unit(s), or emission point(s), or the associated control equipment without the required amended permit(s).

Any owner or operator of the specified emission unit(s), emission point(s), or associated control equipment, including any person who becomes an owner or operator subsequent to the issuance date of the affected permit(s), is responsible for assuring that the installation, operation, and maintenance of the equipment listed in the permit(s) is in compliance with the provisions of the permit(s) and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, these permits are not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend the permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) The permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
- (2) This current amendment becomes void.

11. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

These requirements shall apply to each permit included in this "Collection of Air Permits" document.

- A. The owner or operator shall furnish the Department the following written notifications:
- (1) In accordance with 567 IAC 22.3(3)"b", dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)"b" shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)"b".
 - (2) In accordance with 567 IAC 22.3(3)"f", when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
 - (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
 - (4) Unless specified, in accordance with a federal regulation, the owner or the owner's authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.
- If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.
- B. The owner or operator shall furnish the Department with the following reports:
- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.
 - (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.
 - (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).

- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Table 6 – Permit History

Project No.	Permit No.	Description	Stack Testing	Issuance Date
18-017	18-A-117	Issue new Permit for Material Storage Piles; Establish PM ₁₀ Emission Limits	No	09/06/2018
18-366	18-A-117-S1	Update Pile Throughput; Enclose Units	No	03/14/2019
22-153	18-A-117-S2	Change Emission Rate, Moisture Content, and Throughput	No	12/08/2022
25-225	18-A-117-S3	Update Equipment List; Reduce Throughput for Piles E and H; and Modify Emission Limits	No	12/10/2025
	25-A-232	Issue new Permit to EU LP-29, previously permit under Permit No. 18-A-117-S2		
	25-A-233	Issue new Permit to EU LP-35, previously permit under Permit No. 18-A-117-S2		

END OF PERMIT



Air Quality Construction Permits Collection of Air Permits

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

(563) 324-1391, Ext. 1140
dosland@linwoodmining.com

401 E Front St
Davenport, IA 52804

Project/Process Description

Pile A System

Equipment Location: 401 E Front Street
Davenport, Iowa 52804

Project Number: 25-225

Project Description: Update equipment list; Reduce annual throughput for Material Storage Piles E and H; Correct designation for Kiln 4 and Kiln 3 conveyors and issue individual permits to these units; and Modify emission limits.

Date: December 10, 2025

The permits in this document are issued in accordance with 567 Iowa Administrative Code Chapter 22, and are issued subject to the terms and conditions contained in this document. Issuance of the permits in this document shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law. If any permit contained in this document is modified, superseded, expires, or for any other reason changes or ceases to exist, the status of that permit shall not affect the validity or enforceability of any other permit contained in this document.

Under the Direction of the Director of the
Department of Natural Resources

**Table 1.A - List of Emission Units and Control Measures for Emission Point Pile A
Permit No. 18-A-117-S3**

**Table 1.A.1
Material Storage Piles**

EU ID	Total Area (ft²)	Active Working Face* (ft²)	Throughput (tpy)	Load In/Load out (Moisture %)	Wind Erosion (Silt Content %)	Control (Load In, % Reduction)	Control (Load Out, % Reduction)
EU Pile Barge	244,618	12,231	600,000	2.0	3.9	None	None
EU Pile B	131,097	6,555	650,000	0.5	0.56	Wind Screen (50%) (CE PileB1)	None
EU Pile E	240,554	12,028	50,000	1.5	3.95	Wind Screen (50%) (CE PileE)	None
EU Pile H	116,627	5,831	10,000	2.1	3.9	No Load In	None

*Active working face is 5 percent of pile total area.

**Table 1.A.2
Conveyors**

EU ID	Emission Unit Description	Maximum Rated Capacity	CE Description and ID	Stack Testing
EU LP-30	Kiln 4 Conveyor	50.31 tons/hour	None	No
EU LP-34	Kiln 3 Conveyor	43.13 tons/hour	None	No
EU TP20-CAM	TP20 CAM Span Belt Stacker	500 tons/hour	None	No
EU TP21-CAM	TP21 CAM Span Belt Stacker	500 tons/hour	None	No

**Table 2.B - List of Emission Units, Control Equipment, Emission Points, and Permits
Kiln Screeners**

EP ID	EU ID	Emission Unit Description	Maximum Rated Capacity	CE Description and ID	Stack Testing	Permit Number
EP LP-29	EP LP-29	Kiln 4 Screener	50.31 tons/year	Building Enclosure (95%) (CE LP-29)	No	25-A-232
EP LP-35	EP LP-35	Kiln 3 Screener	43.13 tons/year	Building Enclosure (95%) (CE LP-35)	No	25-A-233

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in any permit contained in this “Collection of Air Permits.”

A. The following emission limits shall not be exceeded per emission point:

Table 2 - Emission Point Specific Emission Limits

EP ID	Pollutant	lb/day	Other Limits	Reference/Basis
EP Pile A	Particulate Matter (PM) – State	71.50 ¹	NA	NA
	PM ₁₀	32.84 ^{1,2}	NA	NAAQS
	PM _{2.5}	5.65 ¹	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“c”
EP LP-29	Particulate Matter (PM) – State	1.81 ⁴	NA	NA
	PM ₁₀	0.58 ^{4,2}	NA	NAAQS
	PM _{2.5}	0.23 ⁴	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“d”
EP LP-35	Particulate Matter (PM) – State	1.55 ⁴	NA	NA
	PM ₁₀	0.50 ^{4,2}	NA	NAAQS
	PM _{2.5}	0.19 ⁴	NA	NA
	Opacity	NA	See Footnote 3	567 IAC 23.3(2)“d”

¹ Established in Project Number 25-225, per facility’s request, to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability. The emission limit is based on each control efficiency, each maximum silt content, and each minimum moisture content for the material storage piles specified in Table 1.A.1.

² Established in Project Number 25-225 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

³ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property.

⁴ Established in Project Number 25-225, per facility’s request, to keep the project minor for purposes of the PSD applicability. The emission limit is based on a building enclosure efficiency of 95 percent.

2. Compliance Demonstration(s)

For each Emission Point listed in the “Compliance Demonstrations” table, if an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

**Table 3.A - Compliance Demonstrations
(Emission Units Pile Barge, Pile B, and Pile E)**

EU ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EU Pile Barge EU Pile B EU Pile E	PM – State	Active Surface Silt and Moisture Sampling	Quarterly		AP-42, Appendix C.1 and Appendix C.2 ¹
		Recordkeeping	See Footnote 2	NA	NA
		None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
	PM ₁₀	Active Surface Silt and Moisture Sampling	Quarterly		AP-42, Appendix C.1 and Appendix C.2 ¹
		Recordkeeping	See Footnote 2	NA	NA
		None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	PM _{2.5}	Active Surface Silt and Moisture Sampling	Quarterly		AP-42, Appendix C.1 and Appendix C.2 ¹
		Recordkeeping	See Footnote 2	NA	NA
		None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

¹ Silt load testing shall be conducted according to the procedures outlined in AP-42, Appendix C.1 (*Procedures for Sampling Surface/Bulk Dust Loading*) and C.2 (*Procedures for Laboratory Analysis of Surface/Bulk Dust Loading Samples*).

² See Permit Condition 5 for the required recordkeeping requirements.

Table 4.B - Compliance Demonstrations
(Emission Units Pile H, LP-29, LP-30, LP-34, and LP-35)

EU ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EU Pile H EU LP-29	PM – State	None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
EU LP-30	PM ₁₀	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
EU LP-34 EU LP-35	PM _{2.5}	None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 21.10(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department for review no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

The emission points shall conform to the specifications listed below:

Table 5 - Emission Point Characteristics

EP ID	Stack Height (feet)	Discharge Style	Stack Opening (inches)	Stack Temperature (°F)	Exhaust Flowrate (scfm)
EP Pile A	(1)	(1)	(1)	(1)	(1)
EP LP-29	(2)	(2)	(2)	(2)	(2)
EP LP-35	(2)	(2)	(2)	(2)	(2)

⁽¹⁾ *There is no physical stack associated with this emission point. Fugitive emissions are generated when the working face of Piles Barge, B, E, and H is disturbed during facility normal operation.*

⁽²⁾ *The emission unit associated with this emission point is located inside a building enclosure.*

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

- (1) Material Storage Piles Barge, B, E, and H are not affected emission units under NSPS, because there are no applicable categories at this time.
- (2) The kiln screeners (EU LP-29 and EU LP-35) and the kiln conveyors (EU LP-30 and EU LP-34) are located at a facility that is subject to NSPS Subpart OOO (*Standards of Performance for Nonmetallic Mineral Processing Plants*). However, these units are not subject to this subpart, because they were constructed prior to the applicability date (after August 31, 1983) of Subpart OOO and they have not been modified or reconstructed since their initial construction.
- (3) The stackers (EU TP20-CAM and EU TP21-CAM) are located at a facility that is subject to NSPS Subpart OOO (*Standards of Performance for Nonmetallic Mineral Processing Plants*). However, these units are not subject to Subpart OOO, because they do not meet the definition of “transfer point” in §60.671 of Subpart OOO

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (1) This facility (Plant No. 82-01-015) is of the source category affected by 40 CFR Part 63, Subpart AAAAA (*National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants*). However, this facility is not subject to this subpart, because it has been determined under 40 CFR §63.7142 of Subpart AAAAA that this facility is a NESHAP area source.
- (2) Material Storage Piles Barge, B, E, and H are not affected emissions unit NESHAP, because there are no applicable categories at this time

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by these permits shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for these permits shall be:

- A. The owner or operator shall operate the material storage piles described in Table 1.A.1 and the processing units described in Tables 1.A.2 and 1.B as follows:
 - (1) Whenever any of the material storage piles described in Table 1.A.1 and the processing units described in Tables 1.A.2 and 1.B is operating, the owner or operator shall take reasonable precautions to prevent the discharge beyond the lot line of the property. Reasonable precautions include, but are not limited to:
 - a. The installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials.
 - b. The use, where practical, of water or chemicals for control of dusts.
 - (2) The owner or operator shall conduct visible emissions observations each time any of the processing units described in Table 1.A.2 is in operation. This requirement shall not apply on the days that none of the processing units described in Table 1.A.2 is operating.
 - a. The owner or operator shall record the date and time of the observation and the presence or absence of visible emission.
 - b. If visible emissions are observed, the owner or operator shall:
 - i. Investigate the emission unit or control equipment and make corrections to the associated operations or equipment.
 - ii. Maintain a record of all corrective actions taken.
 - (3) The maximum area for the material storage piles described in Table 1.A.1 shall not exceed 1,310,000 square feet, combined.
 - a. The owner or operator shall maintain annual records of the combined area, in square feet, for the material storage piles described in Table 1.A.1.

- (4) During high wind episodes (greater than 12 miles per hour), if visible emissions are observed from the working face of any of the material storage piles described in Table 1.A.1, the owner or operator shall employ measures to eliminate or minimize emissions. Such measures may include applying dust suppressant or covering the working face of the material storage pile.
 - a. The owner or operator shall develop a written plan to implement, at a minimum, measures to minimize emissions during high wind episodes (greater than 12 miles per hour).
 - i. The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.
- (5) The owner or operator shall maintain Material Storage Pile Barge (EU Pile Barge), Material Storage Pile B (EU Pile B), and Material Storage Pile E (EU Pile E) a minimum distance of 80 feet from the fence along Highway 22.
 - a. The owner or operator shall maintain records of the date when Material Storage Pile Barge (EU Pile Barge), Material Storage Pile B (EU Pile B), and Material Storage Pile E (EU Pile E) were moved 80 feet from the fence line along Highway 22.
 - b. The owner or operator shall maintain annual records of the distance from the fence line along Highway 22 for Material Storage Pile Barge (EU Pile Barge), Material Storage Pile B (EU Pile B), and Material Storage Pile E (EU Pile E).
- (6) The owner or operator shall maintain equipment to ensure 24-hour surveillance of all gaps in the property berm along the river boundaries. "No Trespassing" signs shall be posted at both ends of the gap in the property berm coverage to further restrict public access.
- (7) The owner or operator shall maintain a fence along all property lines except as specified in Permit Condition 5.A.(6) to restrict public access to the facility's property.
- (8) The owner or operator shall install and maintain signage to restrict public access from the landfill to Linwood property.

B. The owner or operator shall operate Material Storage Pile Barge (EU Pile Barge) as follows:

- (1) Material Storage Pile Barge (EU Pile Barge) is restricted to a maximum of 600,000 tons of limestone per 12-month rolling period.
 - a. The owner or operator shall install equipment necessary to monitor the throughput for Material Storage Pile Barge (EU Pile Barge). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile Barge (EU Pile Barge) on a monthly basis.
 - c. The owner or operator shall calculate and record the total limestone throughput, in tons, for Material Storage Pile Barge (EU Pile Barge) on a rolling 12-month basis.

(2) The average active surface moisture content for Material Storage Pile Barge (EU Pile Barge) shall be greater than or equal to 2.0 percent by weight.

- a. The owner or operator shall sample the active surface of Material Storage Pile Barge (EU Pile Barge) to determine moisture content as percent by weight once per calendar quarter.
- b. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
- c. The owner or operator shall determine the average moisture content as percent by weight for all samples taken per calendar quarter.
- d. On a quarterly basis, the owner or operator shall maintain the following records for each sampling event:
 1. The date of the sample;
 2. The sample location;
 3. The measured moisture content as percent by weight;
 4. The average moisture content as percent by weight; and
 5. The operator's initials.

(3) The average active surface silt content for Material Storage Pile Barge (EU Pile Barge) shall be less than or equal to 3.9 percent by weight.

- i. The owner or operator shall sample the active surface of Material Storage Pile Barge (EU Pile Barge) to determine silt content as percent by weight once per calendar quarter.
- ii. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
- iii. The owner or operator shall determine the average silt content as percent by weight for all samples taken per calendar quarter.

C. The owner or operator shall operate Material Storage Pile B (EU Pile B) as follows:

(1) The owner or operator shall install a Wind Screen (CE PileB1) on the load-in hoppers associated with Material Storage Pile B (EU Pile B).

- a. The owner or operator shall maintain a record of the date when installation of the Wind Screen (CE PileB1) was completed.
- b. The owner or operator shall maintain the Wind Screen (CE PileB1) in a manner to minimize emissions and achieve 50 percent reduction in emissions due to load-in of material from the hopper associated with Material Storage Pile B (EU Pile B). At a minimum, the Wind Screen (CE PileB1) shall be enclosed on three sides, at a height of 5 feet above the hopper and maintained in good working order.
 - i. The owner or operator shall develop an operating and maintenance plan for the Wind Screen (CE PileB1), including periodic inspections and a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.

- ii. The owner or operator shall maintain a record of all inspections and maintenance activities and any action resulting from the inspection and maintenance of the Wind Screen (CE PileB1).
- (2) Material Storage Pile B (EU Pile B) is restricted to a maximum throughput of 2,238 tons of limestone per calendar day.
 - a. The owner or operator shall install equipment necessary to monitor the throughput for Material Storage Pile B (EU Pile B). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile B (EU Pile B) for each calendar day.
- (3) Material Storage Pile B (EU Pile B) is restricted to a maximum throughput of 650,000 tons of limestone per 12-month rolling period.
 - a. The owner or operator shall install equipment necessary to monitor the throughput for Material Storage Pile B (EU Pile B). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile B (EU Pile B) on a monthly basis.
 - c. The owner or operator shall calculate and record the total limestone throughput, in tons, for Material Storage Pile B (EU Pile B) on a rolling 12-month basis.
- (5) The average active surface moisture content for Material Storage Pile B (EU Pile B) shall be greater than or equal to 0.5 percent by weight.
 - a. The owner or operator shall sample the active surface of Material Storage Pile B (EU Pile B) to determine moisture content as percent by weight once per calendar quarter.
 - b. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
 - c. The owner or operator shall determine the average moisture content as percent by weight for all samples taken per calendar quarter.

- d. On a quarterly basis, the owner or operator shall maintain the following records for each sampling event:
 - 1. The date of the sample;
 - 2. The sample location;
 - 3. The measured moisture content as percent by weight;
 - 4. The average moisture content as percent by weight; and
 - 5. The operator's initials.
- (6) The average active surface silt content for Material Storage Pile Be (EU Pile B) shall be less than or equal to 3.9 percent by weight.
 - a. The owner or operator shall sample the active surface of Material Storage Pile B (EU Pile B) to determine silt content as percent by weight once per calendar quarter.
 - b. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
 - c. The owner or operator shall determine the average silt content as percent by weight for all samples taken per calendar quarter.
- D. The owner or operator shall operate Material Storage Pile E (EU Pile E) as follows:
 - (1) The owner or operator shall install a Wind Screen (CE PileE) on the load-in hoppers associated with Material Storage Pile E (EU Pile E).
 - a. The owner or operator shall maintain a record of the date when installation of the Wind Screen (CE PileE) was completed.
 - b. The owner or operator shall maintain the Wind Screen (CE PileE) in a manner to minimize emissions and achieve 50 percent reduction in emissions due to load-in of material from the hopper associated with Material Storage Pile E (EU Pile E). At a minimum, the Wind Screen (CE PileE) shall be enclosed on three sides, at a height of 5 feet above the hopper and maintained in good working order.
 - i. The owner or operator shall develop an operating and maintenance plan for the Wind Screen (CE PileE), including periodic inspections and a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - ii. The owner or operator shall maintain a record of all inspections and maintenance activities and any action resulting from the inspection and maintenance of the Wind Screen (CE PileE).
 - (2) Material Storage Pile E (EU Pile E) is restricted to a maximum throughput of 2,640 tons of limestone per calendar day.
 - a. The owner or operator shall install equipment necessary to monitor the throughput for Material Storage Pile E (EU Pile E). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile E (EU Pile E) for each calendar day.

- (3) Material Storage Pile E (EU Pile E) is restricted to a maximum throughput of 50,000 tons of limestone per 12-month rolling period.
- a. The owner or operator shall install equipment necessary to monitor the throughput for Material Storage Pile E (EU Pile E). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile E (EU Pile E) on a monthly basis.
 - c. The owner or operator shall calculate and record the total limestone throughput, in tons, for Material Storage Pile E (EU Pile E) on a rolling 12-month basis.
- (4) The average active surface moisture content for Material Storage Pile E (EU Pile E) shall be greater than or equal to 1.5 percent by weight.
- a. The owner or operator shall sample the active surface of Material Storage Pile E (EU Pile E) to determine moisture content as percent by weight once per calendar quarter.
 - b. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
 - c. The owner or operator shall determine the average moisture content as percent by weight for all samples taken per calendar quarter.
 - d. On a quarterly basis, the owner or operator shall maintain the following records for each sampling event:
 1. The date of the sample;
 2. The sample location;
 3. The measured moisture content as percent by weight;
 4. The average moisture content as percent by weight; and
 5. The operator's initials.
- (5) The average active surface silt content for Material Storage Pile E (EU Pile E) shall be less than or equal to 3.95 percent by weight.
- a. The owner or operator shall sample the active surface of Material Storage Pile E (EU Pile E) to determine silt content as percent by weight once per calendar quarter.
 - b. The owner or operator shall take a minimum of two active surface samples per calendar quarter.
 - c. The owner or operator shall determine the average silt content as percent by weight for all samples taken per calendar quarter.

- d. On a quarterly basis, the owner or operator shall maintain the following records for each sampling event:
 1. The date of the sample;
 2. The sample location;
 3. The measured silt content as percent by weight;
 4. The average silt content as percent by weight; and
 5. The operator's initials.
- E. The owner or operator shall maintain the Kiln 4 Screener (EU LP-29) inside a building enclosure (CE LP-29) to utilize 95 percent reduction of particulate emissions generated by the operation of these units.
 - (1) The owner or operator shall develop an operating and maintenance plan for the building enclosure, including periodic inspections and a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - (2) The owner or operator shall maintain a record of all inspections and maintenance activities and any action resulting from the inspection and maintenance of the building enclosure.
 - (3) The owner or operator shall conduct visible emissions observations, once per calendar day, on the building where the Kiln 4 Screener (EU LP-29) is located. This requirement shall not apply on the days that this unit is not operating.
 - a. The owner or operator shall record the date and time of the observation and the presence or absence of visible emission.
 - b. If visible emissions are observed, the owner or operator shall investigate the emission unit or control equipment and make corrections to the associated operations or equipment.
 - c. The owner or operator shall maintain a record of all corrective actions taken.
- F. The owner or operator shall maintain the Kiln 3 Screener (EU LP-35) inside a building enclosure (CE LP-35) to utilize 95 percent reduction of particulate emissions generated by the operation of these units.
 - (1) The owner or operator shall develop an operating and maintenance plan for the building enclosure, including periodic inspections and a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - (2) The owner or operator shall maintain a record of all inspections and maintenance activities and any action resulting from the inspection and maintenance of the building enclosure.
 - (3) The owner or operator shall conduct visible emissions observations, once per calendar day, on the building where the Kiln 3 Screener (EU LP-35) is located. This requirement shall not apply on the days that this unit is not operating.
 - a. The owner or operator shall record the date and time of the observation and the presence or absence of visible emission.
 - b. If visible emissions are observed, the owner or operator shall investigate the emission unit or control equipment and make corrections to the associated operations or equipment.
 - c. The owner or operator shall maintain a record of all corrective actions taken.

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Department Review

These permits are issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in these permits, any control equipment covered by these permits shall operate at all times when the emission unit(s) covered by these permits are in operation.

These permits are issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause the affected permit or permits to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

These permits are for the construction and operation of specific emission unit(s), control equipment, and emission point(s) as described in these permits and in the applications for these permits. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in these permits conform to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter any of the emission unit(s), or emission point(s), or the associated control equipment without the required amended permit(s).

Any owner or operator of the specified emission unit(s), emission point(s), or associated control equipment, including any person who becomes an owner or operator subsequent to the issuance date of the affected permit(s), is responsible for assuring that the installation, operation, and maintenance of the equipment listed in the permit(s) is in compliance with the provisions of the permit(s) and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, these permits are not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend the permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) The permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
- (2) This current amendment becomes void.

11. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

These requirements shall apply to each permit included in this "Collection of Air Permits" document.

- A. The owner or operator shall furnish the Department the following written notifications:
- (1) In accordance with 567 IAC 22.3(3)"b", dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)"b" shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)"b".
 - (2) In accordance with 567 IAC 22.3(3)"f", when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
 - (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
 - (4) Unless specified, in accordance with a federal regulation, the owner or the owner's authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.
- If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.
- B. The owner or operator shall furnish the Department with the following reports:
- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.
 - (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.
 - (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).

- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Table 6 – Permit History

Project No.	Permit No.	Description	Stack Testing	Issuance Date
18-017	18-A-117	Issue new Permit for Material Storage Piles; Establish PM ₁₀ Emission Limits	No	09/06/2018
18-366	18-A-117-S1	Update Pile Throughput; Enclose Units	No	03/14/2019
22-153	18-A-117-S2	Change Emission Rate, Moisture Content, and Throughput	No	12/08/2022
25-225	18-A-117-S3	Update Equipment List; Reduce Throughput for Piles E and H; and Modify Emission Limits	No	12/10/2025
	25-A-232	Issue new Permit to EU LP-29, previously permit under Permit No. 18-A-117-S2		
	25-A-233	Issue new Permit to EU LP-35, previously permit under Permit No. 18-A-117-S2		

END OF PERMIT



Air Quality Construction Permits Collection of Air Permits

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

(563) 324-1391, Ext. 1140
dosland@linwoodmining.com

401 E Front St
Davenport, IA 52804

Project/Process Description

North Mill Limestone Milling Facility

Equipment Location: 401 E Front St
Davenport, Iowa 52804

Project Number: 25-225

Project Description: Increase the area for Material Storage Pile 16; Add annual throughput limit for Material Storage Pile 16, and Amend Emission Limits for Emission Point CC-25.

Date: December 10, 2025

The permits in this document are issued in accordance with 567 Iowa Administrative Code Chapter 22, and are issued subject to the terms and conditions contained in this document. Issuance of the permits in this document shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law. If any permit contained in this document is modified, superseded, expires, or for any other reason changes or ceases to exist, the status of that permit shall not affect the validity or enforceability of any other permit contained in this document.

Under the Direction of the Director of the
Department of Natural Resources

**List of Emission Units, Control Equipment, Emission Points, and Permits
North Mill Limestone Milling Facility**

**Table 1.A
North Mill Dryer System**

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-20-D	North Mill Dryer	130 tons/hour, dry limestone	Baghouse (CE CC-20)	EP CC-20	Yes	25-A-181-S1
EU CC-20-B	North Mill Dryer Burner	70 million Btu/hour, natural gas				

**Table 1.B
North Mill Milling System**

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-21-M	North Mill Roller Mill	60 tons/hour, dry limestone	Baghouse (CE CC-21)	EP CC-21	Yes	25-A-182-S1
EU CC-21-C	North Mill Roller Mill Cyclone					

**Table 1.C
North Mill Inside Dust System**

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-22-M	North Mill Cage Mill	45 tons/hour, limestone	Baghouse (CE CC-22)	EP CC-22	Yes	25-A-183-S1
EU CC-22-DH	North Mill Dryer Baghouse Hopper	25 tons/hour, limestone				
EU CC-22-RH	North Mill Roller Mill Baghouse Hopper	5 tons/hour, limestone				
EU CC-22-R	North Mill Roller Mill Product	55 tons/hour, limestone				
EU CC-22-CSE	North Mill Transfer System (conveyors, screws, and elevators)	130 tons/hour, limestone				

Table 1.D
North Mill Loadout Dust System

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-23-S3	North Mill Loadout Spout #3	125 tons/hour, limestone	Baghouse (CE CC-23)	EP CC-23	Yes	25-A-184-S1
EU CC-23-S4	North Mill Loadout Spout #4	125 tons/hour, limestone				

Table 1.E
North Mill Tank Vent Dust System

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-24-T7	North Mill Storage Tank #7	1,000 tons, limestone	Baghouse (CE CC-24)	EP CC-24	Yes	25-A-185-S1
EU CC-24-T8	North Mill Storage Tank #8	1,000 tons, limestone				
EU CC-24-B3	North Mill Storage Bin #3	400 tons, limestone				
EU CC-24-B4	North Mill Storage Bin #4	400 tons, limestone				
EU CC-24-B5	North Mill Storage Bin #5	400 tons, limestone				
EU CC-24-B6	North Mill Storage Bin #6	400 tons, limestone				
EU CC-24-S5	North Mill Loadout Spout #5	125 tons/hour, limestone				
EU CC-24-S6	North Mill Loadout Spout #6	125 tons/hour, limestone				

Table 1.F
North Mill Dryer Convey System

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-25-C1	North Mill Hopper to Feed Conveyor	130 tons/hour, dry limestone	None	EP CC-25	Yes	25-A-186-S2
EU CC-25-C2	North Mill Feed Conveyor to Dryer	130 tons/hour, dry limestone	None			
EU CC-25-C3	North Mill Dryer Transfer to Convey Inside	130 tons/hour, dry limestone	None			
EU Pile 16	Material Storage Pile 16	389,280 square feet	None	EP CC-25	No	

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in any permit contained in this “Collection of Air Permits.”

- A. The following federal emission limits shall not be exceeded for each of the following emission points and emission units:

**Table 2 – Federal Emission Limits
(New Source Performance Standards)**

ID	Pollutant	Limits	Reference/Basis
EP CC-21 EP CC-22 EP CC-23 EP CC-24	Particulate Matter (PM) – Federal	0.014 gr/dscf ^{1,2}	40 CFR Part 60, Subpart OOO [567 IAC 23.1(2)“bbb”] ³
EU CC-25-C1	Opacity	7% ^{4,5}	
EU CC-25-C2			
EU CC-25-C2			

¹ The emission limit is expressed as the average of three stack test runs.

² Per Table 2 to Subpart OOO of Part 60, the owner or operator shall meet this limit for affected sources **with a capture system** that commenced construction, modification, or reconstruction on or after April 22, 2008.

³ Department’s reference to 40 CFR Part 60, Subpart OOO – *Standards of Performance for Nonmetallic Mineral Processing Plants* [40 CFR §60.670 – 40 CFR §60.676].

⁴ The emission limit is based on a six-minute average.

⁵ Per Table 3 to Subpart OOO of Part 60, the owner or operator shall meet this limit for affected sources **without a capture system** that commenced construction, modification, or reconstruction on or after April 22, 2008.

B. The following emission limits shall not be exceeded for each of the following emission points:

Table 1 - Emission Point Specific Emission Limits

EP ID	Pollutant	lb/hr ¹	Other Limits	Reference/Basis
EP CC-20	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		1.71 ²	NA	Requested
	PM ₁₀	1.71 ³	NA	NAAQS
	PM _{2.5}	0.90 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
	Sulfur Dioxide (SO ₂)	0.04 ²	500 ppmv ¹	567 IAC 23.3(3)“e”
	Nitrogen Oxides (NO _x)	7.70 ²	NA	NA
	Volatile Organic Compounds (VOC)	0.44 ²	NA	NA
	Carbon Monoxide (CO)	6.47 ²	NA	NA
EP CC-21	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.20 ²	NA	Requested
	PM ₁₀	0.20 ³	NA	NAAQS
	PM _{2.5}	0.15 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
EP CC-22	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.86 ²	NA	Requested
	PM ₁₀	0.86 ³	NA	NAAQS
	PM _{2.5}	0.45 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
EP CC-23	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.77 ²	NA	Requested
	PM ₁₀	0.77 ³	NA	NAAQS
	PM _{2.5}	0.40 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”

¹ The emission limit is expressed as the average of three stack test runs.

² Established in Project Number 25-182, per facility’s request, to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability.

³ Established in Project Number 25-182 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ Established in Project Number 25-267 to reduce emissions below the applicable modeling significant emission rate.

⁵ The emission limit is based on a six-minute average.

⁶ An exceedance of the indicator opacity of “no visible emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁷ Established in Project Number 25-182 to maintain potential emissions below “major source” thresholds for purposes of NESHAP applicability.

**Table 2 - Emission Point Specific Emission Limits
(Continued)**

EP ID	Pollutant	lb/hr ¹	Other Limits	Reference/Basis
EP CC-24	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.34 ²	NA	Requested
	PM ₁₀	0.34 ³	NA	NAAQS
	PM _{2.5}	0.20 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
EP CC-25	Particulate Matter (PM) – State	NA	61.0 lb/day ⁷	NA
	PM ₁₀	NA	24.96 lb/day ^{7,8}	NAAQS
	PM _{2.5}	NA	5.04 lb/day ⁷	NA
	Opacity	NA	See Footnote 9	567 IAC 23.3(2)“c”

¹ The emission limit is expressed as the average of three stack test runs.

² Established in Project Number 25-182, per facility’s request, to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability.

³ Established in Project Number 25-182 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ Established in Project Number 25-267 to reduce emissions below the applicable modeling significant emission rate.

⁵ The emission limit is based on a six-minute average.

⁶ An exceedance of the indicator opacity of “no visible emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁷ Established in Project Number 25-225 to keep the project minor for purposes of PSD applicability.

⁸ Established in Project Number 25-225 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the SIP by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁹ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property.

2. Compliance Demonstration(s)

For each Emission Point listed in the “Compliance Demonstrations” table, if an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

**Table 3.A - Compliance Demonstrations
North Mill Dryer System**

EP ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EP CC-20	PM – State	Stack Test ¹	Initial One Time	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
	PM ₁₀ ²	Stack Test ¹	Initial One Time	1 hour	40 CFR 51, Appendix M, 201A with 202
	PM _{2.5} ²	Stack Test ¹	Initial One Time	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9
	SO ₂	None	NA	1 hour	40 CFR 60, Appendix A, Method 6C
	NO _x	None	NA	1 hour	40 CFR 60, Appendix A, Method 7E
	VOC	None	NA	1 hour	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18
	CO	None	NA	1 hour	40 CFR 60, Appendix A, Method 10
	HAP	None	NA	1 hour	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18

¹ The owner or operator shall conduct initial testing on EP CC-20 to demonstrate compliance with the emission limits in Permit Condition 1, Table 3.

² The owner or operator may conduct stack testing for total particulate matter (40 CFR 60, Appendix M, Method 5 and 40 CFR 51, Appendix M, Method 202) to demonstrate compliance with the PM₁₀ and PM_{2.5} emission limits in Permit Condition 1, Table 3.

Table 4.B - Compliance Demonstrations
Emission Points CC-21, CC-22, CC-23, and CC-24

EP ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EP CC-21	PM – Federal	Stack Test ¹	Initial	1 hour	40 CFR 60, Appendix A, Method 5
			One Time		
EP CC-22	PM – State	Stack Test ¹	Initial	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
			One Time		
EP CC-23	PM ₁₀ ²	Stack Test ¹	Initial	1 hour	40 CFR 51, Appendix M, 201A with 202
			One Time		
EP CC-24	PM _{2.5} ²	Stack Test ¹	Initial	1 hour	40 CFR 51, Appendix M, 201A with 202
			One Time		
EP CC-24	Opacity	Visible Emissions Observation ³	NA	1 hour	40 CFR 60, Appendix A, Method 9
			Quarterly ³	30 minutes ³	40 CFR Part 60, Appendix A-7, Method 22

¹ The owner or operator shall conduct initial testing on EP CC-21, EP CC-22, EP CC-23, and EP CC-24 to demonstrate compliance with the applicable emission limits in Permit Condition 1, Tables 2 and 3.

² The owner or operator may conduct stack testing for total particulate matter (*40 CFR 60, Appendix M, Method 5 and 40 CFR 51, Appendix M, Method 202*) to demonstrate compliance with the PM₁₀ and PM_{2.5} emission limits in Permit Condition 1, Table 3.

³ According to 40 CFR §60.674(c) of Subpart OOO, the owner or operator of any affected facility for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses a baghouse to control emissions shall conduct quarterly 30-minute visible emissions inspections using EPA Method 22 (40 CFR Part 60, Appendix A-7). The Method 22 test shall be conducted while the baghouse is operating.

Table 5.C - Compliance Demonstrations
Emission Units CC-25-C1, CC-25-C2, and CC-25-C3

EU ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EU CC-25-C1	Opacity	Visible Emissions Observation ¹	Initial ¹	30 minutes ²	40 CFR 60, Appendix A, Method 9
EU CC-25-C2			Once Every 5 Calendar Years ¹		
EU CC-25-C3					

¹ The owner or operator shall conduct initial and periodic visible emissions observations on Emission Units CC-25-C1, CC-25-C2, EU CC-25-C3 to demonstrate compliance with the emission limit in Permit Condition 1, Table 2.

² According to 40 CFR §60.675(c)(3) of Subpart OOO, when determining compliance with the fugitive emissions standard for any affected facility described under §60.672(b) or §60.672(e)(1) of Subpart OOO, the duration of the Method 9 (40 CFR Part 60, Appendix A-4) observations must be 30 minutes (five 6-minute averages).

Table 6.D - Compliance Demonstrations
Emission Point CC-25

EP ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EP CC-25	PM – State	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
	PM ₁₀	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	PM _{2.5}	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

¹ See Permit Condition 5 for the required recordkeeping requirements.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 21.10(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department for review no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

The emission points shall conform to the specifications listed below:

Table 7 - Emission Point Characteristics

EP ID	Stack Height (feet)	Discharge Style	Stack Opening (inches)	Stack Temperature (°F)	Exhaust Flowrate (scfm)
EP CC-20	30	Vertical, unobstructed	48	200	40,000
EP CC-21	65	Vertical, unobstructed	16	150	4,600
EP CC-22	65	Vertical, unobstructed	32	100	20,000
EP CC-23	30	Vertical, unobstructed	30	68	18,000
EP CC-24	30	Vertical, unobstructed	20	68	8,000
EP CC-25	*	*	*	*	*

* There is no physical stack associated with EP CC-25. Uncaptured emissions are generated during the operation of Emission Units CC-25-C1, CC-25-C2, EU CC-25-C3. Fugitive emissions are generated when the working face of Material Storage Pile 16 is disturbed during facility normal operation.

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

- (1) The North Mill Dryer System (EP CC-20) is not an affected emission unit under Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart UUU (*Standards of Performance for Calciners and Dryers in Mineral Industries*), because it does not process any of the minerals listed in §60.731 of Subpart UUU.
- (2) Material Storage Pile 16 covered by this permit is not an affected emission unit under the federal standards of performance for new stationary sources, as defined in 40 CFR Part 60, because there are no applicable categories at this time.
- (3) The following subparts apply to the emission units and points listed in Table 6.

Table 6 – Applicable NSPS Standards

ID	Subpart	Title	Type	State Reference (567 IAC)	Federal Reference (40 CFR)
EP CC-21 EP CC-22 EP CC-23 EP CC-24	A	General Provisions	NA	23.1(2)	§60.1 – §60.19
EU CC-25-C1 EU CC-25-C2 EU CC-25-C3	OOO	Standards of Performance for Nonmetallic Mineral Processing Plants	Construction, modification, or reconstruction on or after 4/22/2008	23.1(2)“bbb”	§60.670 - §60.676

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (1) This facility (Plant No. 82-01-015) is of the source category affected by 40 CFR Part 63, Subpart AAAAA (*National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants*). However, this facility is not subject to this subpart, because it has been determined under 40 CFR §63.7142 of Subpart AAAAA that this facility is a NESHAP area source.
- (2) Material Storage Pile 16 (EU Pile 16) is not an affected emission unit under NESHAP, because there are no applicable categories at this time.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by these permits shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for these permits shall be:

- A. The owner or operator shall operate the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) as follows:
 - (1) The North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) is restricted to operating with *either* the Old Mill Limestone Milling Facility (EP CC-1) *or* the New Mill Limestone Milling Facility (EP CC-2 and EP CC-5) at any given time. Simultaneous operation with both the Old Mill and Old Mill limestone milling facilities is not allowed.
 - a. The owner or operator shall maintain onsite procedures to ensure the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) operates with only one of the two specified limestone milling facilities at any given time.
 - b. The owner or operator shall maintain daily records including the date, start and stop time of operation, and the name of any limestone milling facility that operated on each calendar day.
 - (2) The North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) is limited to producing no more than 500,000 tons of limestone per 12-month rolling period.
 - a. The owner or operator shall install equipment necessary to monitor the production of the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone, in tons, produced by the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) on a monthly basis.
 - c. The owner or operator shall calculate and record the total limestone, in tons, produced by the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) on a rolling 12-month basis.

- (3) The owner or operator shall conduct visible emissions observations on Emission Points CC-20, CC-21, CC-22, CC-23, and CC-24 once per calendar day. This requirement shall not apply on the days that the associated processing units are not in operation.
 - a. The owner or operator shall record the date and time of the observation and the presence or absence of visible emissions.
 - b. If visible emissions are observed, the owner or operator shall investigate the emission unit or control equipment and make corrections to the associated operations or equipment.
 - c. The owner or operator shall maintain a record of all corrective actions taken.
- (4) The owner or operator shall use natural gas as the only fuel for the North Mill Dryer Burner (EU CC-20-B).
 - a. The owner or operator shall maintain a record of the type of fuel burned in the North Mill Dryer Burner (EU CC-20-B).
 - b. Prior to burning any other fuel in this unit, the owner or operator shall apply for and obtain an amended construction permit from the Department.
- (5) Whenever the North Mill Hopper to Feed Conveyor (EU CC-25-C1), or the North Mill Feed Conveyor to Dryer (EU CC-25-C2), or the North Mill Dryer Transfer to Convey Inside (EU CC-25-C3) is operating, the owner or operator shall take reasonable precautions to prevent the discharge of dust emissions beyond the lot line of the property.
 - a. Reasonable precautions include, but are not limited to:
 - i. The installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials.
 - ii. The use, where practical, of water or chemicals for control of dusts.
- (6) The owner or operator shall operate the loadout spouts as follows:
 - a. Emission Point CC-23 (North Mill Loadout Dust System)
 - i. Simultaneous operation of the North Mill Loadout Spout #3 (EU CC-23-S3) and the North Mill Loadout Spout #4 (EU CC-23-S4) is not allowed; therefore, the owner or operator shall operate either the North Mill Loadout Spout #3 (EU CC-23-S3) *or* the North Mill Loadout Spout #4 (EU CC-23-S4) at one time.
 - ii. Open-bodied product trucks transporting materials from the North Mill Loadout Spout #3 (EU CC-23-S3) *or* the North Mill Loadout Spout #4 (EU CC-23-S4) shall be covered to minimize discharge of dust emissions.

- b. Emission Point CC-24 (North Mill Tank Vent Dust System)
 - i. Simultaneous operation of the North Mill Loadout Spout #5 (EU CC-24-S5) and the North Mill Loadout Spout #6 (EU CC-24-S6) is not allowed; therefore, the owner or operator shall operate either the North Mill Loadout Spout #5 (EU CC-24-S5) *or* the North Mill Loadout Spout #6 (EU CC-24-S6) at one time.
 - ii. Open-bodied product trucks transporting materials from the North Mill Loadout Spout #5 (EU CC-24-S5) *or* the North Mill Loadout Spout #6 (EU CC-24-S6) shall be covered to minimize discharge of dust emissions.
- (7) The owner or operator shall operate, inspect, and maintain Baghouses CC-20, CC-21, CC-22, CC-23, and CC-24 in accordance with the manufacturer's specifications and instructions.
 - a. The owner or operator shall keep a record of all maintenance and inspection activities performed on the control equipment covered by this permit. At a minimum, this record shall include the date that any inspection and/or maintenance was performed; any issues identified during inspection and maintenance activities; the date each issue was resolved; and the identification of the staff member performing the inspection and maintenance activities.
- (8) The owner or operator shall operate Material Storage Pile 16 as follows:
 - a. The maximum area for Material Storage Pile 16 shall not exceed 389,280 square feet.
 - i. The owner or operator shall maintain annual records of the Material Storage Pile 16 area, in square feet.
 - b. The throughput for Material Storage Pile 16 shall not exceed 656,000 tons of limestone per 12-month rolling period.
 - i. The owner or operator shall install equipment necessary to monitor the throughput Material Storage Pile 16. The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - ii. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile 16 on a monthly basis.
 - iii. The owner or operator shall calculate and record the total limestone throughput, in tons, for Material Storage Pile 16 on a rolling 12-month basis.
 - c. During high wind episodes (greater than 12 miles per hour), if visible emissions are observed from the working face of Material Storage Pile 16, the owner or operator shall employ measures to eliminate or minimize emissions. Such measures may include applying dust suppressant or covering the working face of Material Storage Pile 16.
 - i. The owner or operator shall develop a written plan to implement, at a minimum, measures to minimize emissions during high wind episodes (greater than 12 miles per hour).
 - a) The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.

- B. The owner or operator shall comply with the applicable requirements in 40 CFR Part 60, Subpart OOO [*Standards of Performance for Nonmetallic Mineral Processing Plants* (§60.670 - §60.676)], including those not specifically mentioned in this permit.
- (1) Per Table 2 to Subpart OOO of Part 60, the owner or operator shall monitor Baghouses CC-21, CC-22, CC-23, and CC-24 as indicated below.
- a. Per 40 CFR §60.674(c) of Subpart OOO, the owner or operator of any affected emission unit for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses baghouse to control emissions shall conduct quarterly 30-minute visible emissions inspections using EPA Method 22 (40 CFR Part 60, Appendix A-7).
- i. The Method 22 test shall be conducted while the baghouse is operating. The test is successful if no visible emissions are observed. If any visible emissions are observed, the owner or operator shall initiate corrective action within 24 hours to return the baghouse to normal operation.
- ii. The owner or operator shall record each Method 22 test, including the date and any corrective actions taken, in the logbook required under §60.676(b) of Subpart OOO.
- iii. The owner or operator may establish a different baghouse-specific success level for the visible emissions test (other than no visible emissions) by conducting a PM performance test according to §60.675(b) of Subpart OOO simultaneously with a Method 22 to determine what constitutes normal visible emissions from the baghouse when it is in compliance with the applicable PM concentration limit in Table 2 of Subpart OOO. The revised visible emissions success level shall be incorporated into the permit for the affected facility.
- iv. Per 40 CFR §60.674(d) of Subpart OOO, as an alternative to the periodic Method 22 visible emissions inspections specified above, the owner or operator of any affected emission unit for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses a baghouse to control emissions may use a bag leak detection system according to §60.674(d)(1) through (3) of Subpart OOO.
- (2) The owner or operator shall comply with the applicable reporting and recordkeeping requirements in 40 CFR §60.676 of Subpart OOO.

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

8. Department Review

These permits are issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in these permits, any control equipment covered by these permits shall operate at all times when the emission unit(s) covered by these permits are in operation.

These permits are issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause the affected permit or permits to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

9. Owner and Operator Responsibility

These permits are for the construction and operation of specific emission unit(s), control equipment, and emission point(s) as described in these permits and in the applications for these permits. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in these permits conform to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter any of the emission unit(s), or emission point(s), or the associated control equipment without the required amended permit(s).

Any owner or operator of the specified emission unit(s), emission point(s), or associated control equipment, including any person who becomes an owner or operator subsequent to the issuance date of the affected permit(s), is responsible for assuring that the installation, operation, and maintenance of the equipment listed in the permit(s) is in compliance with the provisions of the permit(s) and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

10. Transferability

Unless the equipment is portable, these permits are not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

11. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend the permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) The permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
- (2) This current amendment becomes void.

12. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

13. Notification, Reporting, and Recordkeeping

These requirements shall apply to each permit included in this "Collection of Air Permits" document.

- A. The owner or operator shall furnish the Department the following written notifications:
- (1) In accordance with 567 IAC 22.3(3)"b", dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)"b" shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)"b".
 - (2) In accordance with 567 IAC 22.3(3)"f", when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
 - (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
 - (4) Unless specified, in accordance with a federal regulation, the owner or the owner's authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.
- If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.
- B. The owner or operator shall furnish the Department with the following reports:
- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.
 - (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.
 - (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).

- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

14. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

15. Permit History

Table 7 – Permit History

Project No.	Permit No.	Description	Stack Testing	Issuance Date
25-182	25-A-181	Issue Permit to EP CC-20 (Dryer System)	Yes	09/24/2025
	25-A-182	Issue Permit to EP CC-21 (Milling System)	Yes	
	25-A-183	Issue Permit to EP CC-22 (Inside Dust System)	Yes	
	25-A-184	Issue Permit to EP CC-23 (Loadout Dust System)	Yes	
	25-A-185	Issue Permit to EP CC-24 (Tank Vent Dust System)	Yes	
	25-A-186	Issue Permit to Conveying Units	Yes	
		Move Pile 16 from 18-A-110-S1 to 25-A-186	No	
25-267	25-A-181-S1	Establish PM _{2.5} Emission Limits and Amend the operation of the North Mill Limestone Milling Facility	Yes	10/29/2025
	25-A-182-S1			
	25-A-183-S1			
	25-A-184-S1			
	25-A-185-S1			
	25-A-186-S1			

**Table 7 – Permit History
(Continued)**

Project No.	Permit No.	Description	Stack Testing	Issuance Date
25-225	25-A-186-S2	Increase the area for Material Storage Pile 16; Add annual throughput limit for Material Storage Pile 16, and Amend Emission Limits for Emission Point CC-25	No	12/10/2025

END OF PERMIT



Air Quality Construction Permits Collection of Air Permits

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

(563) 324-1391, Ext. 1140
dosland@linwoodmining.com

401 E Front St
Davenport, IA 52804

Project/Process Description

North Mill Limestone Milling Facility

Equipment Location: 401 E Front St
Davenport, Iowa 52804

Project Number: 25-225

Project Description: Increase the area for Material Storage Pile 16; Add annual throughput limit for Material Storage Pile 16, and Amend Emission Limits for Emission Point CC-25.

Date: December 10, 2025

The permits in this document are issued in accordance with 567 Iowa Administrative Code Chapter 22, and are issued subject to the terms and conditions contained in this document. Issuance of the permits in this document shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law. If any permit contained in this document is modified, superseded, expires, or for any other reason changes or ceases to exist, the status of that permit shall not affect the validity or enforceability of any other permit contained in this document.

Under the Direction of the Director of the
Department of Natural Resources

**List of Emission Units, Control Equipment, Emission Points, and Permits
North Mill Limestone Milling Facility**

**Table 1.A
North Mill Dryer System**

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-20-D	North Mill Dryer	130 tons/hour, dry limestone	Baghouse (CE CC-20)	EP CC-20	Yes	25-A-181-S1
EU CC-20-B	North Mill Dryer Burner	70 million Btu/hour, natural gas				

**Table 1.B
North Mill Milling System**

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-21-M	North Mill Roller Mill	60 tons/hour, dry limestone	Baghouse (CE CC-21)	EP CC-21	Yes	25-A-182-S1
EU CC-21-C	North Mill Roller Mill Cyclone					

**Table 1.C
North Mill Inside Dust System**

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-22-M	North Mill Cage Mill	45 tons/hour, limestone	Baghouse (CE CC-22)	EP CC-22	Yes	25-A-183-S1
EU CC-22-DH	North Mill Dryer Baghouse Hopper	25 tons/hour, limestone				
EU CC-22-RH	North Mill Roller Mill Baghouse Hopper	5 tons/hour, limestone				
EU CC-22-R	North Mill Roller Mill Product	55 tons/hour, limestone				
EU CC-22-CSE	North Mill Transfer System (conveyors, screws, and elevators)	130 tons/hour, limestone				

Table 1.D
North Mill Loadout Dust System

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-23-S3	North Mill Loadout Spout #3	125 tons/hour, limestone	Baghouse (CE CC-23)	EP CC-23	Yes	25-A-184-S1
EU CC-23-S4	North Mill Loadout Spout #4	125 tons/hour, limestone				

Table 1.E
North Mill Tank Vent Dust System

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-24-T7	North Mill Storage Tank #7	1,000 tons, limestone	Baghouse (CE CC-24)	EP CC-24	Yes	25-A-185-S1
EU CC-24-T8	North Mill Storage Tank #8	1,000 tons, limestone				
EU CC-24-B3	North Mill Storage Bin #3	400 tons, limestone				
EU CC-24-B4	North Mill Storage Bin #4	400 tons, limestone				
EU CC-24-B5	North Mill Storage Bin #5	400 tons, limestone				
EU CC-24-B6	North Mill Storage Bin #6	400 tons, limestone				
EU CC-24-S5	North Mill Loadout Spout #5	125 tons/hour, limestone				
EU CC-24-S6	North Mill Loadout Spout #6	125 tons/hour, limestone				

Table 1.F
North Mill Dryer Convey System

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-25-C1	North Mill Hopper to Feed Conveyor	130 tons/hour, dry limestone	None	EP CC-25	Yes	25-A-186-S2
EU CC-25-C2	North Mill Feed Conveyor to Dryer	130 tons/hour, dry limestone	None			
EU CC-25-C3	North Mill Dryer Transfer to Convey Inside	130 tons/hour, dry limestone	None			
EU Pile 16	Material Storage Pile 16	389,280 square feet	None	EP CC-25	No	

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in any permit contained in this “Collection of Air Permits.”

- A. The following federal emission limits shall not be exceeded for each of the following emission points and emission units:

**Table 2 – Federal Emission Limits
(New Source Performance Standards)**

ID	Pollutant	Limits	Reference/Basis
EP CC-21 EP CC-22 EP CC-23 EP CC-24	Particulate Matter (PM) – Federal	0.014 gr/dscf ^{1,2}	40 CFR Part 60, Subpart OOO [567 IAC 23.1(2)“bbb”] ³
EU CC-25-C1	Opacity	7% ^{4,5}	
EU CC-25-C2			
EU CC-25-C2			

¹ The emission limit is expressed as the average of three stack test runs.

² Per Table 2 to Subpart OOO of Part 60, the owner or operator shall meet this limit for affected sources **with a capture system** that commenced construction, modification, or reconstruction on or after April 22, 2008.

³ Department’s reference to 40 CFR Part 60, Subpart OOO – *Standards of Performance for Nonmetallic Mineral Processing Plants* [40 CFR §60.670 – 40 CFR §60.676].

⁴ The emission limit is based on a six-minute average.

⁵ Per Table 3 to Subpart OOO of Part 60, the owner or operator shall meet this limit for affected sources **without a capture system** that commenced construction, modification, or reconstruction on or after April 22, 2008.

B. The following emission limits shall not be exceeded for each of the following emission points:

Table 1 - Emission Point Specific Emission Limits

EP ID	Pollutant	lb/hr ¹	Other Limits	Reference/Basis
EP CC-20	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		1.71 ²	NA	Requested
	PM ₁₀	1.71 ³	NA	NAAQS
	PM _{2.5}	0.90 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
	Sulfur Dioxide (SO ₂)	0.04 ²	500 ppmv ¹	567 IAC 23.3(3)“e”
	Nitrogen Oxides (NO _x)	7.70 ²	NA	NA
	Volatile Organic Compounds (VOC)	0.44 ²	NA	NA
	Carbon Monoxide (CO)	6.47 ²	NA	NA
EP CC-21	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.20 ²	NA	Requested
	PM ₁₀	0.20 ³	NA	NAAQS
	PM _{2.5}	0.15 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
EP CC-22	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.86 ²	NA	Requested
	PM ₁₀	0.86 ³	NA	NAAQS
	PM _{2.5}	0.45 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
EP CC-23	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.77 ²	NA	Requested
	PM ₁₀	0.77 ³	NA	NAAQS
	PM _{2.5}	0.40 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”

¹ The emission limit is expressed as the average of three stack test runs.

² Established in Project Number 25-182, per facility’s request, to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability.

³ Established in Project Number 25-182 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ Established in Project Number 25-267 to reduce emissions below the applicable modeling significant emission rate.

⁵ The emission limit is based on a six-minute average.

⁶ An exceedance of the indicator opacity of “no visible emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁷ Established in Project Number 25-182 to maintain potential emissions below “major source” thresholds for purposes of NESHAP applicability.

**Table 2 - Emission Point Specific Emission Limits
(Continued)**

EP ID	Pollutant	lb/hr ¹	Other Limits	Reference/Basis
EP CC-24	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.34 ²	NA	Requested
	PM ₁₀	0.34 ³	NA	NAAQS
	PM _{2.5}	0.20 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
EP CC-25	Particulate Matter (PM) – State	NA	61.0 lb/day ⁷	NA
	PM ₁₀	NA	24.96 lb/day ^{7,8}	NAAQS
	PM _{2.5}	NA	5.04 lb/day ⁷	NA
	Opacity	NA	See Footnote 9	567 IAC 23.3(2)“c”

¹ The emission limit is expressed as the average of three stack test runs.

² Established in Project Number 25-182, per facility’s request, to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability.

³ Established in Project Number 25-182 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ Established in Project Number 25-267 to reduce emissions below the applicable modeling significant emission rate.

⁵ The emission limit is based on a six-minute average.

⁶ An exceedance of the indicator opacity of “no visible emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁷ Established in Project Number 25-225 to keep the project minor for purposes of PSD applicability.

⁸ Established in Project Number 25-225 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the SIP by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁹ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property.

2. Compliance Demonstration(s)

For each Emission Point listed in the “Compliance Demonstrations” table, if an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

**Table 3.A - Compliance Demonstrations
North Mill Dryer System**

EP ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EP CC-20	PM – State	Stack Test ¹	Initial One Time	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
	PM ₁₀ ²	Stack Test ¹	Initial One Time	1 hour	40 CFR 51, Appendix M, 201A with 202
	PM _{2.5} ²	Stack Test ¹	Initial One Time	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9
	SO ₂	None	NA	1 hour	40 CFR 60, Appendix A, Method 6C
	NO _x	None	NA	1 hour	40 CFR 60, Appendix A, Method 7E
	VOC	None	NA	1 hour	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18
	CO	None	NA	1 hour	40 CFR 60, Appendix A, Method 10
	HAP	None	NA	1 hour	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18

¹ The owner or operator shall conduct initial testing on EP CC-20 to demonstrate compliance with the emission limits in Permit Condition 1, Table 3.

² The owner or operator may conduct stack testing for total particulate matter (*40 CFR 60, Appendix M, Method 5 and 40 CFR 51, Appendix M, Method 202*) to demonstrate compliance with the PM₁₀ and PM_{2.5} emission limits in Permit Condition 1, Table 3.

Table 4.B - Compliance Demonstrations
Emission Points CC-21, CC-22, CC-23, and CC-24

EP ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EP CC-21	PM – Federal	Stack Test ¹	Initial	1 hour	40 CFR 60, Appendix A, Method 5
			One Time		
EP CC-22	PM – State	Stack Test ¹	Initial	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
			One Time		
EP CC-23	PM ₁₀ ²	Stack Test ¹	Initial	1 hour	40 CFR 51, Appendix M, 201A with 202
			One Time		
EP CC-24	PM _{2.5} ²	Stack Test ¹	Initial	1 hour	40 CFR 51, Appendix M, 201A with 202
			One Time		
EP CC-24	Opacity	Visible Emissions Observation ³	NA	1 hour	40 CFR 60, Appendix A, Method 9
			Quarterly ³	30 minutes ³	40 CFR Part 60, Appendix A-7, Method 22

¹ The owner or operator shall conduct initial testing on EP CC-21, EP CC-22, EP CC-23, and EP CC-24 to demonstrate compliance with the applicable emission limits in Permit Condition 1, Tables 2 and 3.

² The owner or operator may conduct stack testing for total particulate matter (*40 CFR 60, Appendix M, Method 5 and 40 CFR 51, Appendix M, Method 202*) to demonstrate compliance with the PM₁₀ and PM_{2.5} emission limits in Permit Condition 1, Table 3.

³ According to 40 CFR §60.674(c) of Subpart OOO, the owner or operator of any affected facility for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses a baghouse to control emissions shall conduct quarterly 30-minute visible emissions inspections using EPA Method 22 (40 CFR Part 60, Appendix A-7). The Method 22 test shall be conducted while the baghouse is operating.

Table 5.C - Compliance Demonstrations
Emission Units CC-25-C1, CC-25-C2, and CC-25-C3

EU ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EU CC-25-C1	Opacity	Visible Emissions Observation ¹	Initial ¹	30 minutes ²	40 CFR 60, Appendix A, Method 9
EU CC-25-C2			Once Every 5 Calendar Years ¹		
EU CC-25-C3					

¹ The owner or operator shall conduct initial and periodic visible emissions observations on Emission Units CC-25-C1, CC-25-C2, EU CC-25-C3 to demonstrate compliance with the emission limit in Permit Condition 1, Table 2.

² According to 40 CFR §60.675(c)(3) of Subpart OOO, when determining compliance with the fugitive emissions standard for any affected facility described under §60.672(b) or §60.672(e)(1) of Subpart OOO, the duration of the Method 9 (40 CFR Part 60, Appendix A-4) observations must be 30 minutes (five 6-minute averages).

Table 6.D - Compliance Demonstrations
Emission Point CC-25

EP ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EP CC-25	PM – State	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
	PM ₁₀	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	PM _{2.5}	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

¹ See Permit Condition 5 for the required recordkeeping requirements.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 21.10(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department for review no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

The emission points shall conform to the specifications listed below:

Table 7 - Emission Point Characteristics

EP ID	Stack Height (feet)	Discharge Style	Stack Opening (inches)	Stack Temperature (°F)	Exhaust Flowrate (scfm)
EP CC-20	30	Vertical, unobstructed	48	200	40,000
EP CC-21	65	Vertical, unobstructed	16	150	4,600
EP CC-22	65	Vertical, unobstructed	32	100	20,000
EP CC-23	30	Vertical, unobstructed	30	68	18,000
EP CC-24	30	Vertical, unobstructed	20	68	8,000
EP CC-25	*	*	*	*	*

* There is no physical stack associated with EP CC-25. Uncaptured emissions are generated during the operation of Emission Units CC-25-C1, CC-25-C2, EU CC-25-C3. Fugitive emissions are generated when the working face of Material Storage Pile 16 is disturbed during facility normal operation.

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

- (1) The North Mill Dryer System (EP CC-20) is not an affected emission unit under Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart UUU (*Standards of Performance for Calciners and Dryers in Mineral Industries*), because it does not process any of the minerals listed in §60.731 of Subpart UUU.
- (2) Material Storage Pile 16 covered by this permit is not an affected emission unit under the federal standards of performance for new stationary sources, as defined in 40 CFR Part 60, because there are no applicable categories at this time.
- (3) The following subparts apply to the emission units and points listed in Table 6.

Table 6 – Applicable NSPS Standards

ID	Subpart	Title	Type	State Reference (567 IAC)	Federal Reference (40 CFR)
EP CC-21 EP CC-22 EP CC-23 EP CC-24	A	General Provisions	NA	23.1(2)	§60.1 – §60.19
EU CC-25-C1 EU CC-25-C2 EU CC-25-C3	OOO	Standards of Performance for Nonmetallic Mineral Processing Plants	Construction, modification, or reconstruction on or after 4/22/2008	23.1(2)“bbb”	§60.670 - §60.676

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (1) This facility (Plant No. 82-01-015) is of the source category affected by 40 CFR Part 63, Subpart AAAAA (*National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants*). However, this facility is not subject to this subpart, because it has been determined under 40 CFR §63.7142 of Subpart AAAAA that this facility is a NESHAP area source.
- (2) Material Storage Pile 16 (EU Pile 16) is not an affected emission unit under NESHAP, because there are no applicable categories at this time.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by these permits shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for these permits shall be:

- A. The owner or operator shall operate the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) as follows:
 - (1) The North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) is restricted to operating with *either* the Old Mill Limestone Milling Facility (EP CC-1) *or* the New Mill Limestone Milling Facility (EP CC-2 and EP CC-5) at any given time. Simultaneous operation with both the Old Mill and Old Mill limestone milling facilities is not allowed.
 - a. The owner or operator shall maintain onsite procedures to ensure the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) operates with only one of the two specified limestone milling facilities at any given time.
 - b. The owner or operator shall maintain daily records including the date, start and stop time of operation, and the name of any limestone milling facility that operated on each calendar day.
 - (2) The North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) is limited to producing no more than 500,000 tons of limestone per 12-month rolling period.
 - a. The owner or operator shall install equipment necessary to monitor the production of the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone, in tons, produced by the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) on a monthly basis.
 - c. The owner or operator shall calculate and record the total limestone, in tons, produced by the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) on a rolling 12-month basis.

- (3) The owner or operator shall conduct visible emissions observations on Emission Points CC-20, CC-21, CC-22, CC-23, and CC-24 once per calendar day. This requirement shall not apply on the days that the associated processing units are not in operation.
 - a. The owner or operator shall record the date and time of the observation and the presence or absence of visible emissions.
 - b. If visible emissions are observed, the owner or operator shall investigate the emission unit or control equipment and make corrections to the associated operations or equipment.
 - c. The owner or operator shall maintain a record of all corrective actions taken.
- (4) The owner or operator shall use natural gas as the only fuel for the North Mill Dryer Burner (EU CC-20-B).
 - a. The owner or operator shall maintain a record of the type of fuel burned in the North Mill Dryer Burner (EU CC-20-B).
 - b. Prior to burning any other fuel in this unit, the owner or operator shall apply for and obtain an amended construction permit from the Department.
- (5) Whenever the North Mill Hopper to Feed Conveyor (EU CC-25-C1), or the North Mill Feed Conveyor to Dryer (EU CC-25-C2), or the North Mill Dryer Transfer to Convey Inside (EU CC-25-C3) is operating, the owner or operator shall take reasonable precautions to prevent the discharge of dust emissions beyond the lot line of the property.
 - a. Reasonable precautions include, but are not limited to:
 - i. The installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials.
 - ii. The use, where practical, of water or chemicals for control of dusts.
- (6) The owner or operator shall operate the loadout spouts as follows:
 - a. Emission Point CC-23 (North Mill Loadout Dust System)
 - i. Simultaneous operation of the North Mill Loadout Spout #3 (EU CC-23-S3) and the North Mill Loadout Spout #4 (EU CC-23-S4) is not allowed; therefore, the owner or operator shall operate either the North Mill Loadout Spout #3 (EU CC-23-S3) *or* the North Mill Loadout Spout #4 (EU CC-23-S4) at one time.
 - ii. Open-bodied product trucks transporting materials from the North Mill Loadout Spout #3 (EU CC-23-S3) *or* the North Mill Loadout Spout #4 (EU CC-23-S4) shall be covered to minimize discharge of dust emissions.

- b. Emission Point CC-24 (North Mill Tank Vent Dust System)
 - i. Simultaneous operation of the North Mill Loadout Spout #5 (EU CC-24-S5) and the North Mill Loadout Spout #6 (EU CC-24-S6) is not allowed; therefore, the owner or operator shall operate either the North Mill Loadout Spout #5 (EU CC-24-S5) *or* the North Mill Loadout Spout #6 (EU CC-24-S6) at one time.
 - ii. Open-bodied product trucks transporting materials from the North Mill Loadout Spout #5 (EU CC-24-S5) *or* the North Mill Loadout Spout #6 (EU CC-24-S6) shall be covered to minimize discharge of dust emissions.
- (7) The owner or operator shall operate, inspect, and maintain Baghouses CC-20, CC-21, CC-22, CC-23, and CC-24 in accordance with the manufacturer's specifications and instructions.
 - a. The owner or operator shall keep a record of all maintenance and inspection activities performed on the control equipment covered by this permit. At a minimum, this record shall include the date that any inspection and/or maintenance was performed; any issues identified during inspection and maintenance activities; the date each issue was resolved; and the identification of the staff member performing the inspection and maintenance activities.
- (8) The owner or operator shall operate Material Storage Pile 16 as follows:
 - a. The maximum area for Material Storage Pile 16 shall not exceed 389,280 square feet.
 - i. The owner or operator shall maintain annual records of the Material Storage Pile 16 area, in square feet.
 - b. The throughput for Material Storage Pile 16 shall not exceed 656,000 tons of limestone per 12-month rolling period.
 - i. The owner or operator shall install equipment necessary to monitor the throughput Material Storage Pile 16. The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - ii. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile 16 on a monthly basis.
 - iii. The owner or operator shall calculate and record the total limestone throughput, in tons, for Material Storage Pile 16 on a rolling 12-month basis.
 - c. During high wind episodes (greater than 12 miles per hour), if visible emissions are observed from the working face of Material Storage Pile 16, the owner or operator shall employ measures to eliminate or minimize emissions. Such measures may include applying dust suppressant or covering the working face of Material Storage Pile 16.
 - i. The owner or operator shall develop a written plan to implement, at a minimum, measures to minimize emissions during high wind episodes (greater than 12 miles per hour).
 - a) The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.

- B. The owner or operator shall comply with the applicable requirements in 40 CFR Part 60, Subpart OOO [*Standards of Performance for Nonmetallic Mineral Processing Plants* (§60.670 - §60.676)], including those not specifically mentioned in this permit.
- (1) Per Table 2 to Subpart OOO of Part 60, the owner or operator shall monitor Baghouses CC-21, CC-22, CC-23, and CC-24 as indicated below.
- a. Per 40 CFR §60.674(c) of Subpart OOO, the owner or operator of any affected emission unit for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses baghouse to control emissions shall conduct quarterly 30-minute visible emissions inspections using EPA Method 22 (40 CFR Part 60, Appendix A-7).
- i. The Method 22 test shall be conducted while the baghouse is operating. The test is successful if no visible emissions are observed. If any visible emissions are observed, the owner or operator shall initiate corrective action within 24 hours to return the baghouse to normal operation.
- ii. The owner or operator shall record each Method 22 test, including the date and any corrective actions taken, in the logbook required under §60.676(b) of Subpart OOO.
- iii. The owner or operator may establish a different baghouse-specific success level for the visible emissions test (other than no visible emissions) by conducting a PM performance test according to §60.675(b) of Subpart OOO simultaneously with a Method 22 to determine what constitutes normal visible emissions from the baghouse when it is in compliance with the applicable PM concentration limit in Table 2 of Subpart OOO. The revised visible emissions success level shall be incorporated into the permit for the affected facility.
- iv. Per 40 CFR §60.674(d) of Subpart OOO, as an alternative to the periodic Method 22 visible emissions inspections specified above, the owner or operator of any affected emission unit for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses a baghouse to control emissions may use a bag leak detection system according to §60.674(d)(1) through (3) of Subpart OOO.
- (2) The owner or operator shall comply with the applicable reporting and recordkeeping requirements in 40 CFR §60.676 of Subpart OOO.

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

8. Department Review

These permits are issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in these permits, any control equipment covered by these permits shall operate at all times when the emission unit(s) covered by these permits are in operation.

These permits are issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause the affected permit or permits to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

9. Owner and Operator Responsibility

These permits are for the construction and operation of specific emission unit(s), control equipment, and emission point(s) as described in these permits and in the applications for these permits. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in these permits conform to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter any of the emission unit(s), or emission point(s), or the associated control equipment without the required amended permit(s).

Any owner or operator of the specified emission unit(s), emission point(s), or associated control equipment, including any person who becomes an owner or operator subsequent to the issuance date of the affected permit(s), is responsible for assuring that the installation, operation, and maintenance of the equipment listed in the permit(s) is in compliance with the provisions of the permit(s) and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

10. Transferability

Unless the equipment is portable, these permits are not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

11. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend the permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) The permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
- (2) This current amendment becomes void.

12. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

13. Notification, Reporting, and Recordkeeping

These requirements shall apply to each permit included in this "Collection of Air Permits" document.

- A. The owner or operator shall furnish the Department the following written notifications:
- (1) In accordance with 567 IAC 22.3(3)"b", dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)"b" shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)"b".
 - (2) In accordance with 567 IAC 22.3(3)"f", when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
 - (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
 - (4) Unless specified, in accordance with a federal regulation, the owner or the owner's authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.
- If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.
- B. The owner or operator shall furnish the Department with the following reports:
- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.
 - (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.
 - (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).

- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

14. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

15. Permit History

Table 7 – Permit History

Project No.	Permit No.	Description	Stack Testing	Issuance Date
25-182	25-A-181	Issue Permit to EP CC-20 (Dryer System)	Yes	09/24/2025
	25-A-182	Issue Permit to EP CC-21 (Milling System)	Yes	
	25-A-183	Issue Permit to EP CC-22 (Inside Dust System)	Yes	
	25-A-184	Issue Permit to EP CC-23 (Loadout Dust System)	Yes	
	25-A-185	Issue Permit to EP CC-24 (Tank Vent Dust System)	Yes	
	25-A-186	Issue Permit to Conveying Units	Yes	
		Move Pile 16 from 18-A-110-S1 to 25-A-186	No	
25-267	25-A-181-S1	Establish PM _{2.5} Emission Limits and Amend the operation of the North Mill Limestone Milling Facility	Yes	10/29/2025
	25-A-182-S1			
	25-A-183-S1			
	25-A-184-S1			
	25-A-185-S1			
	25-A-186-S1			

**Table 7 – Permit History
(Continued)**

Project No.	Permit No.	Description	Stack Testing	Issuance Date
25-225	25-A-186-S2	Increase the area for Material Storage Pile 16; Add annual throughput limit for Material Storage Pile 16, and Amend Emission Limits for Emission Point CC-25	No	12/10/2025

END OF PERMIT



Air Quality Construction Permits Collection of Air Permits

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

(563) 324-1391, Ext. 1140
dosland@linwoodmining.com

401 E Front St
Davenport, IA 52804

Project/Process Description

North Mill Limestone Milling Facility

Equipment Location: 401 E Front St
Davenport, Iowa 52804

Project Number: 25-225

Project Description: Increase the area for Material Storage Pile 16; Add annual throughput limit for Material Storage Pile 16, and Amend Emission Limits for Emission Point CC-25.

Date: December 10, 2025

The permits in this document are issued in accordance with 567 Iowa Administrative Code Chapter 22, and are issued subject to the terms and conditions contained in this document. Issuance of the permits in this document shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law. If any permit contained in this document is modified, superseded, expires, or for any other reason changes or ceases to exist, the status of that permit shall not affect the validity or enforceability of any other permit contained in this document.

Under the Direction of the Director of the
Department of Natural Resources

**List of Emission Units, Control Equipment, Emission Points, and Permits
North Mill Limestone Milling Facility**

**Table 1.A
North Mill Dryer System**

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-20-D	North Mill Dryer	130 tons/hour, dry limestone	Baghouse (CE CC-20)	EP CC-20	Yes	25-A-181-S1
EU CC-20-B	North Mill Dryer Burner	70 million Btu/hour, natural gas				

**Table 1.B
North Mill Milling System**

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-21-M	North Mill Roller Mill	60 tons/hour, dry limestone	Baghouse (CE CC-21)	EP CC-21	Yes	25-A-182-S1
EU CC-21-C	North Mill Roller Mill Cyclone					

**Table 1.C
North Mill Inside Dust System**

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-22-M	North Mill Cage Mill	45 tons/hour, limestone	Baghouse (CE CC-22)	EP CC-22	Yes	25-A-183-S1
EU CC-22-DH	North Mill Dryer Baghouse Hopper	25 tons/hour, limestone				
EU CC-22-RH	North Mill Roller Mill Baghouse Hopper	5 tons/hour, limestone				
EU CC-22-R	North Mill Roller Mill Product	55 tons/hour, limestone				
EU CC-22-CSE	North Mill Transfer System (conveyors, screws, and elevators)	130 tons/hour, limestone				

Table 1.D
North Mill Loadout Dust System

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-23-S3	North Mill Loadout Spout #3	125 tons/hour, limestone	Baghouse (CE CC-23)	EP CC-23	Yes	25-A-184-S1
EU CC-23-S4	North Mill Loadout Spout #4	125 tons/hour, limestone				

Table 1.E
North Mill Tank Vent Dust System

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-24-T7	North Mill Storage Tank #7	1,000 tons, limestone	Baghouse (CE CC-24)	EP CC-24	Yes	25-A-185-S1
EU CC-24-T8	North Mill Storage Tank #8	1,000 tons, limestone				
EU CC-24-B3	North Mill Storage Bin #3	400 tons, limestone				
EU CC-24-B4	North Mill Storage Bin #4	400 tons, limestone				
EU CC-24-B5	North Mill Storage Bin #5	400 tons, limestone				
EU CC-24-B6	North Mill Storage Bin #6	400 tons, limestone				
EU CC-24-S5	North Mill Loadout Spout #5	125 tons/hour, limestone				
EU CC-24-S6	North Mill Loadout Spout #6	125 tons/hour, limestone				

Table 1.F
North Mill Dryer Convey System

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-25-C1	North Mill Hopper to Feed Conveyor	130 tons/hour, dry limestone	None	EP CC-25	Yes	25-A-186-S2
EU CC-25-C2	North Mill Feed Conveyor to Dryer	130 tons/hour, dry limestone	None			
EU CC-25-C3	North Mill Dryer Transfer to Convey Inside	130 tons/hour, dry limestone	None			
EU Pile 16	Material Storage Pile 16	389,280 square feet	None	EP CC-25	No	

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in any permit contained in this “Collection of Air Permits.”

- A. The following federal emission limits shall not be exceeded for each of the following emission points and emission units:

**Table 2 – Federal Emission Limits
(New Source Performance Standards)**

ID	Pollutant	Limits	Reference/Basis
EP CC-21 EP CC-22 EP CC-23 EP CC-24	Particulate Matter (PM) – Federal	0.014 gr/dscf ^{1,2}	40 CFR Part 60, Subpart OOO [567 IAC 23.1(2)“bbb”] ³
EU CC-25-C1	Opacity	7% ^{4,5}	
EU CC-25-C2			
EU CC-25-C2			

¹ The emission limit is expressed as the average of three stack test runs.

² Per Table 2 to Subpart OOO of Part 60, the owner or operator shall meet this limit for affected sources **with a capture system** that commenced construction, modification, or reconstruction on or after April 22, 2008.

³ Department’s reference to 40 CFR Part 60, Subpart OOO – *Standards of Performance for Nonmetallic Mineral Processing Plants* [40 CFR §60.670 – 40 CFR §60.676].

⁴ The emission limit is based on a six-minute average.

⁵ Per Table 3 to Subpart OOO of Part 60, the owner or operator shall meet this limit for affected sources **without a capture system** that commenced construction, modification, or reconstruction on or after April 22, 2008.

B. The following emission limits shall not be exceeded for each of the following emission points:

Table 1 - Emission Point Specific Emission Limits

EP ID	Pollutant	lb/hr ¹	Other Limits	Reference/Basis
EP CC-20	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		1.71 ²	NA	Requested
	PM ₁₀	1.71 ³	NA	NAAQS
	PM _{2.5}	0.90 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
	Sulfur Dioxide (SO ₂)	0.04 ²	500 ppmv ¹	567 IAC 23.3(3)“e”
	Nitrogen Oxides (NO _x)	7.70 ²	NA	NA
	Volatile Organic Compounds (VOC)	0.44 ²	NA	NA
	Carbon Monoxide (CO)	6.47 ²	NA	NA
	Total HAP	0.17 ⁷	NA	NESHAP Area Source
EP CC-21	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.20 ²	NA	Requested
	PM ₁₀	0.20 ³	NA	NAAQS
	PM _{2.5}	0.15 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
EP CC-22	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.86 ²	NA	Requested
	PM ₁₀	0.86 ³	NA	NAAQS
	PM _{2.5}	0.45 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
EP CC-23	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.77 ²	NA	Requested
	PM ₁₀	0.77 ³	NA	NAAQS
	PM _{2.5}	0.40 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”

¹ The emission limit is expressed as the average of three stack test runs.

² Established in Project Number 25-182, per facility’s request, to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability.

³ Established in Project Number 25-182 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ Established in Project Number 25-267 to reduce emissions below the applicable modeling significant emission rate.

⁵ The emission limit is based on a six-minute average.

⁶ An exceedance of the indicator opacity of “no visible emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁷ Established in Project Number 25-182 to maintain potential emissions below “major source” thresholds for purposes of NESHAP applicability.

**Table 2 - Emission Point Specific Emission Limits
(Continued)**

EP ID	Pollutant	lb/hr ¹	Other Limits	Reference/Basis
EP CC-24	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.34 ²	NA	Requested
	PM ₁₀	0.34 ³	NA	NAAQS
	PM _{2.5}	0.20 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
EP CC-25	Particulate Matter (PM) – State	NA	61.0 lb/day ⁷	NA
	PM ₁₀	NA	24.96 lb/day ^{7,8}	NAAQS
	PM _{2.5}	NA	5.04 lb/day ⁷	NA
	Opacity	NA	See Footnote 9	567 IAC 23.3(2)“c”

¹ The emission limit is expressed as the average of three stack test runs.

² Established in Project Number 25-182, per facility’s request, to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability.

³ Established in Project Number 25-182 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ Established in Project Number 25-267 to reduce emissions below the applicable modeling significant emission rate.

⁵ The emission limit is based on a six-minute average.

⁶ An exceedance of the indicator opacity of “no visible emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁷ Established in Project Number 25-225 to keep the project minor for purposes of PSD applicability.

⁸ Established in Project Number 25-225 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the SIP by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁹ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property.

2. Compliance Demonstration(s)

For each Emission Point listed in the “Compliance Demonstrations” table, if an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

**Table 3.A - Compliance Demonstrations
North Mill Dryer System**

EP ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EP CC-20	PM – State	Stack Test ¹	Initial One Time	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
	PM ₁₀ ²	Stack Test ¹	Initial One Time	1 hour	40 CFR 51, Appendix M, 201A with 202
	PM _{2.5} ²	Stack Test ¹	Initial One Time	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9
	SO ₂	None	NA	1 hour	40 CFR 60, Appendix A, Method 6C
	NO _x	None	NA	1 hour	40 CFR 60, Appendix A, Method 7E
	VOC	None	NA	1 hour	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18
	CO	None	NA	1 hour	40 CFR 60, Appendix A, Method 10
	HAP	None	NA	1 hour	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18

¹ The owner or operator shall conduct initial testing on EP CC-20 to demonstrate compliance with the emission limits in Permit Condition 1, Table 3.

² The owner or operator may conduct stack testing for total particulate matter (*40 CFR 60, Appendix M, Method 5 and 40 CFR 51, Appendix M, Method 202*) to demonstrate compliance with the PM₁₀ and PM_{2.5} emission limits in Permit Condition 1, Table 3.

Table 4.B - Compliance Demonstrations
Emission Points CC-21, CC-22, CC-23, and CC-24

EP ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EP CC-21	PM – Federal	Stack Test ¹	Initial	1 hour	40 CFR 60, Appendix A, Method 5
			One Time		
EP CC-22	PM – State	Stack Test ¹	Initial	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
			One Time		
EP CC-23	PM ₁₀ ²	Stack Test ¹	Initial	1 hour	40 CFR 51, Appendix M, 201A with 202
			One Time		
EP CC-24	PM _{2.5} ²	Stack Test ¹	Initial	1 hour	40 CFR 51, Appendix M, 201A with 202
			One Time		
EP CC-24	Opacity	Visible Emissions Observation ³	NA	1 hour	40 CFR 60, Appendix A, Method 9
			Quarterly ³	30 minutes ³	40 CFR Part 60, Appendix A-7, Method 22

¹ The owner or operator shall conduct initial testing on EP CC-21, EP CC-22, EP CC-23, and EP CC-24 to demonstrate compliance with the applicable emission limits in Permit Condition 1, Tables 2 and 3.

² The owner or operator may conduct stack testing for total particulate matter (*40 CFR 60, Appendix M, Method 5 and 40 CFR 51, Appendix M, Method 202*) to demonstrate compliance with the PM₁₀ and PM_{2.5} emission limits in Permit Condition 1, Table 3.

³ According to 40 CFR §60.674(c) of Subpart OOO, the owner or operator of any affected facility for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses a baghouse to control emissions shall conduct quarterly 30-minute visible emissions inspections using EPA Method 22 (40 CFR Part 60, Appendix A-7). The Method 22 test shall be conducted while the baghouse is operating.

Table 5.C - Compliance Demonstrations
Emission Units CC-25-C1, CC-25-C2, and CC-25-C3

EU ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EU CC-25-C1	Opacity	Visible Emissions Observation ¹	Initial ¹	30 minutes ²	40 CFR 60, Appendix A, Method 9
EU CC-25-C2			Once Every 5 Calendar Years ¹		
EU CC-25-C3					

¹ The owner or operator shall conduct initial and periodic visible emissions observations on Emission Units CC-25-C1, CC-25-C2, EU CC-25-C3 to demonstrate compliance with the emission limit in Permit Condition 1, Table 2.

² According to 40 CFR §60.675(c)(3) of Subpart OOO, when determining compliance with the fugitive emissions standard for any affected facility described under §60.672(b) or §60.672(e)(1) of Subpart OOO, the duration of the Method 9 (40 CFR Part 60, Appendix A-4) observations must be 30 minutes (five 6-minute averages).

Table 6.D - Compliance Demonstrations
Emission Point CC-25

EP ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EP CC-25	PM – State	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
	PM ₁₀	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	PM _{2.5}	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

¹ See Permit Condition 5 for the required recordkeeping requirements.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 21.10(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department for review no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

The emission points shall conform to the specifications listed below:

Table 7 - Emission Point Characteristics

EP ID	Stack Height (feet)	Discharge Style	Stack Opening (inches)	Stack Temperature (°F)	Exhaust Flowrate (scfm)
EP CC-20	30	Vertical, unobstructed	48	200	40,000
EP CC-21	65	Vertical, unobstructed	16	150	4,600
EP CC-22	65	Vertical, unobstructed	32	100	20,000
EP CC-23	30	Vertical, unobstructed	30	68	18,000
EP CC-24	30	Vertical, unobstructed	20	68	8,000
EP CC-25	*	*	*	*	*

* There is no physical stack associated with EP CC-25. Uncaptured emissions are generated during the operation of Emission Units CC-25-C1, CC-25-C2, EU CC-25-C3. Fugitive emissions are generated when the working face of Material Storage Pile 16 is disturbed during facility normal operation.

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

- (1) The North Mill Dryer System (EP CC-20) is not an affected emission unit under Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart UUU (*Standards of Performance for Calciners and Dryers in Mineral Industries*), because it does not process any of the minerals listed in §60.731 of Subpart UUU.
- (2) Material Storage Pile 16 covered by this permit is not an affected emission unit under the federal standards of performance for new stationary sources, as defined in 40 CFR Part 60, because there are no applicable categories at this time.
- (3) The following subparts apply to the emission units and points listed in Table 6.

Table 6 – Applicable NSPS Standards

ID	Subpart	Title	Type	State Reference (567 IAC)	Federal Reference (40 CFR)
EP CC-21 EP CC-22 EP CC-23 EP CC-24	A	General Provisions	NA	23.1(2)	§60.1 – §60.19
EU CC-25-C1 EU CC-25-C2 EU CC-25-C3	OOO	Standards of Performance for Nonmetallic Mineral Processing Plants	Construction, modification, or reconstruction on or after 4/22/2008	23.1(2)“bbb”	§60.670 - §60.676

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (1) This facility (Plant No. 82-01-015) is of the source category affected by 40 CFR Part 63, Subpart AAAAA (*National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants*). However, this facility is not subject to this subpart, because it has been determined under 40 CFR §63.7142 of Subpart AAAAA that this facility is a NESHAP area source.
- (2) Material Storage Pile 16 (EU Pile 16) is not an affected emission unit under NESHAP, because there are no applicable categories at this time.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by these permits shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for these permits shall be:

- A. The owner or operator shall operate the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) as follows:
 - (1) The North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) is restricted to operating with *either* the Old Mill Limestone Milling Facility (EP CC-1) *or* the New Mill Limestone Milling Facility (EP CC-2 and EP CC-5) at any given time. Simultaneous operation with both the Old Mill and Old Mill limestone milling facilities is not allowed.
 - a. The owner or operator shall maintain onsite procedures to ensure the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) operates with only one of the two specified limestone milling facilities at any given time.
 - b. The owner or operator shall maintain daily records including the date, start and stop time of operation, and the name of any limestone milling facility that operated on each calendar day.
 - (2) The North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) is limited to producing no more than 500,000 tons of limestone per 12-month rolling period.
 - a. The owner or operator shall install equipment necessary to monitor the production of the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone, in tons, produced by the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) on a monthly basis.
 - c. The owner or operator shall calculate and record the total limestone, in tons, produced by the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) on a rolling 12-month basis.

- (3) The owner or operator shall conduct visible emissions observations on Emission Points CC-20, CC-21, CC-22, CC-23, and CC-24 once per calendar day. This requirement shall not apply on the days that the associated processing units are not in operation.
 - a. The owner or operator shall record the date and time of the observation and the presence or absence of visible emissions.
 - b. If visible emissions are observed, the owner or operator shall investigate the emission unit or control equipment and make corrections to the associated operations or equipment.
 - c. The owner or operator shall maintain a record of all corrective actions taken.
- (4) The owner or operator shall use natural gas as the only fuel for the North Mill Dryer Burner (EU CC-20-B).
 - a. The owner or operator shall maintain a record of the type of fuel burned in the North Mill Dryer Burner (EU CC-20-B).
 - b. Prior to burning any other fuel in this unit, the owner or operator shall apply for and obtain an amended construction permit from the Department.
- (5) Whenever the North Mill Hopper to Feed Conveyor (EU CC-25-C1), or the North Mill Feed Conveyor to Dryer (EU CC-25-C2), or the North Mill Dryer Transfer to Convey Inside (EU CC-25-C3) is operating, the owner or operator shall take reasonable precautions to prevent the discharge of dust emissions beyond the lot line of the property.
 - a. Reasonable precautions include, but are not limited to:
 - i. The installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials.
 - ii. The use, where practical, of water or chemicals for control of dusts.
- (6) The owner or operator shall operate the loadout spouts as follows:
 - a. Emission Point CC-23 (North Mill Loadout Dust System)
 - i. Simultaneous operation of the North Mill Loadout Spout #3 (EU CC-23-S3) and the North Mill Loadout Spout #4 (EU CC-23-S4) is not allowed; therefore, the owner or operator shall operate either the North Mill Loadout Spout #3 (EU CC-23-S3) *or* the North Mill Loadout Spout #4 (EU CC-23-S4) at one time.
 - ii. Open-bodied product trucks transporting materials from the North Mill Loadout Spout #3 (EU CC-23-S3) *or* the North Mill Loadout Spout #4 (EU CC-23-S4) shall be covered to minimize discharge of dust emissions.

- b. Emission Point CC-24 (North Mill Tank Vent Dust System)
 - i. Simultaneous operation of the North Mill Loadout Spout #5 (EU CC-24-S5) and the North Mill Loadout Spout #6 (EU CC-24-S6) is not allowed; therefore, the owner or operator shall operate either the North Mill Loadout Spout #5 (EU CC-24-S5) *or* the North Mill Loadout Spout #6 (EU CC-24-S6) at one time.
 - ii. Open-bodied product trucks transporting materials from the North Mill Loadout Spout #5 (EU CC-24-S5) *or* the North Mill Loadout Spout #6 (EU CC-24-S6) shall be covered to minimize discharge of dust emissions.
- (7) The owner or operator shall operate, inspect, and maintain Baghouses CC-20, CC-21, CC-22, CC-23, and CC-24 in accordance with the manufacturer's specifications and instructions.
 - a. The owner or operator shall keep a record of all maintenance and inspection activities performed on the control equipment covered by this permit. At a minimum, this record shall include the date that any inspection and/or maintenance was performed; any issues identified during inspection and maintenance activities; the date each issue was resolved; and the identification of the staff member performing the inspection and maintenance activities.
- (8) The owner or operator shall operate Material Storage Pile 16 as follows:
 - a. The maximum area for Material Storage Pile 16 shall not exceed 389,280 square feet.
 - i. The owner or operator shall maintain annual records of the Material Storage Pile 16 area, in square feet.
 - b. The throughput for Material Storage Pile 16 shall not exceed 656,000 tons of limestone per 12-month rolling period.
 - i. The owner or operator shall install equipment necessary to monitor the throughput Material Storage Pile 16. The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - ii. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile 16 on a monthly basis.
 - iii. The owner or operator shall calculate and record the total limestone throughput, in tons, for Material Storage Pile 16 on a rolling 12-month basis.
 - c. During high wind episodes (greater than 12 miles per hour), if visible emissions are observed from the working face of Material Storage Pile 16, the owner or operator shall employ measures to eliminate or minimize emissions. Such measures may include applying dust suppressant or covering the working face of Material Storage Pile 16.
 - i. The owner or operator shall develop a written plan to implement, at a minimum, measures to minimize emissions during high wind episodes (greater than 12 miles per hour).
 - a) The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.

- B. The owner or operator shall comply with the applicable requirements in 40 CFR Part 60, Subpart OOO [*Standards of Performance for Nonmetallic Mineral Processing Plants* (§60.670 - §60.676)], including those not specifically mentioned in this permit.
- (1) Per Table 2 to Subpart OOO of Part 60, the owner or operator shall monitor Baghouses CC-21, CC-22, CC-23, and CC-24 as indicated below.
- a. Per 40 CFR §60.674(c) of Subpart OOO, the owner or operator of any affected emission unit for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses baghouse to control emissions shall conduct quarterly 30-minute visible emissions inspections using EPA Method 22 (40 CFR Part 60, Appendix A-7).
- i. The Method 22 test shall be conducted while the baghouse is operating. The test is successful if no visible emissions are observed. If any visible emissions are observed, the owner or operator shall initiate corrective action within 24 hours to return the baghouse to normal operation.
- ii. The owner or operator shall record each Method 22 test, including the date and any corrective actions taken, in the logbook required under §60.676(b) of Subpart OOO.
- iii. The owner or operator may establish a different baghouse-specific success level for the visible emissions test (other than no visible emissions) by conducting a PM performance test according to §60.675(b) of Subpart OOO simultaneously with a Method 22 to determine what constitutes normal visible emissions from the baghouse when it is in compliance with the applicable PM concentration limit in Table 2 of Subpart OOO. The revised visible emissions success level shall be incorporated into the permit for the affected facility.
- iv. Per 40 CFR §60.674(d) of Subpart OOO, as an alternative to the periodic Method 22 visible emissions inspections specified above, the owner or operator of any affected emission unit for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses a baghouse to control emissions may use a bag leak detection system according to §60.674(d)(1) through (3) of Subpart OOO.
- (2) The owner or operator shall comply with the applicable reporting and recordkeeping requirements in 40 CFR §60.676 of Subpart OOO.

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

8. Department Review

These permits are issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in these permits, any control equipment covered by these permits shall operate at all times when the emission unit(s) covered by these permits are in operation.

These permits are issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause the affected permit or permits to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

9. Owner and Operator Responsibility

These permits are for the construction and operation of specific emission unit(s), control equipment, and emission point(s) as described in these permits and in the applications for these permits. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in these permits conform to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter any of the emission unit(s), or emission point(s), or the associated control equipment without the required amended permit(s).

Any owner or operator of the specified emission unit(s), emission point(s), or associated control equipment, including any person who becomes an owner or operator subsequent to the issuance date of the affected permit(s), is responsible for assuring that the installation, operation, and maintenance of the equipment listed in the permit(s) is in compliance with the provisions of the permit(s) and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

10. Transferability

Unless the equipment is portable, these permits are not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

11. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend the permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) The permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
- (2) This current amendment becomes void.

12. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

13. Notification, Reporting, and Recordkeeping

These requirements shall apply to each permit included in this "Collection of Air Permits" document.

- A. The owner or operator shall furnish the Department the following written notifications:
- (1) In accordance with 567 IAC 22.3(3)"b", dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)"b" shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)"b".
 - (2) In accordance with 567 IAC 22.3(3)"f", when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
 - (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
 - (4) Unless specified, in accordance with a federal regulation, the owner or the owner's authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.
- If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.
- B. The owner or operator shall furnish the Department with the following reports:
- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.
 - (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.
 - (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).

- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

14. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

15. Permit History

Table 7 – Permit History

Project No.	Permit No.	Description	Stack Testing	Issuance Date
25-182	25-A-181	Issue Permit to EP CC-20 (Dryer System)	Yes	09/24/2025
	25-A-182	Issue Permit to EP CC-21 (Milling System)	Yes	
	25-A-183	Issue Permit to EP CC-22 (Inside Dust System)	Yes	
	25-A-184	Issue Permit to EP CC-23 (Loadout Dust System)	Yes	
	25-A-185	Issue Permit to EP CC-24 (Tank Vent Dust System)	Yes	
	25-A-186	Issue Permit to Conveying Units	Yes	
		Move Pile 16 from 18-A-110-S1 to 25-A-186	No	
25-267	25-A-181-S1	Establish PM _{2.5} Emission Limits and Amend the operation of the North Mill Limestone Milling Facility	Yes	10/29/2025
	25-A-182-S1			
	25-A-183-S1			
	25-A-184-S1			
	25-A-185-S1			
	25-A-186-S1			

**Table 7 – Permit History
(Continued)**

Project No.	Permit No.	Description	Stack Testing	Issuance Date
25-225	25-A-186-S2	Increase the area for Material Storage Pile 16; Add annual throughput limit for Material Storage Pile 16, and Amend Emission Limits for Emission Point CC-25	No	12/10/2025

END OF PERMIT



Air Quality Construction Permits Collection of Air Permits

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

(563) 324-1391, Ext. 1140
dosland@linwoodmining.com

401 E Front St
Davenport, IA 52804

Project/Process Description

North Mill Limestone Milling Facility

Equipment Location: 401 E Front St
Davenport, Iowa 52804

Project Number: 25-225

Project Description: Increase the area for Material Storage Pile 16; Add annual throughput limit for Material Storage Pile 16, and Amend Emission Limits for Emission Point CC-25.

Date: December 10, 2025

The permits in this document are issued in accordance with 567 Iowa Administrative Code Chapter 22, and are issued subject to the terms and conditions contained in this document. Issuance of the permits in this document shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law. If any permit contained in this document is modified, superseded, expires, or for any other reason changes or ceases to exist, the status of that permit shall not affect the validity or enforceability of any other permit contained in this document.

Under the Direction of the Director of the
Department of Natural Resources

**List of Emission Units, Control Equipment, Emission Points, and Permits
North Mill Limestone Milling Facility**

**Table 1.A
North Mill Dryer System**

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-20-D	North Mill Dryer	130 tons/hour, dry limestone	Baghouse (CE CC-20)	EP CC-20	Yes	25-A-181-S1
EU CC-20-B	North Mill Dryer Burner	70 million Btu/hour, natural gas				

**Table 1.B
North Mill Milling System**

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-21-M	North Mill Roller Mill	60 tons/hour, dry limestone	Baghouse (CE CC-21)	EP CC-21	Yes	25-A-182-S1
EU CC-21-C	North Mill Roller Mill Cyclone					

**Table 1.C
North Mill Inside Dust System**

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-22-M	North Mill Cage Mill	45 tons/hour, limestone	Baghouse (CE CC-22)	EP CC-22	Yes	25-A-183-S1
EU CC-22-DH	North Mill Dryer Baghouse Hopper	25 tons/hour, limestone				
EU CC-22-RH	North Mill Roller Mill Baghouse Hopper	5 tons/hour, limestone				
EU CC-22-R	North Mill Roller Mill Product	55 tons/hour, limestone				
EU CC-22-CSE	North Mill Transfer System (conveyors, screws, and elevators)	130 tons/hour, limestone				

Table 1.D
North Mill Loadout Dust System

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-23-S3	North Mill Loadout Spout #3	125 tons/hour, limestone	Baghouse (CE CC-23)	EP CC-23	Yes	25-A-184-S1
EU CC-23-S4	North Mill Loadout Spout #4	125 tons/hour, limestone				

Table 1.E
North Mill Tank Vent Dust System

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-24-T7	North Mill Storage Tank #7	1,000 tons, limestone	Baghouse (CE CC-24)	EP CC-24	Yes	25-A-185-S1
EU CC-24-T8	North Mill Storage Tank #8	1,000 tons, limestone				
EU CC-24-B3	North Mill Storage Bin #3	400 tons, limestone				
EU CC-24-B4	North Mill Storage Bin #4	400 tons, limestone				
EU CC-24-B5	North Mill Storage Bin #5	400 tons, limestone				
EU CC-24-B6	North Mill Storage Bin #6	400 tons, limestone				
EU CC-24-S5	North Mill Loadout Spout #5	125 tons/hour, limestone				
EU CC-24-S6	North Mill Loadout Spout #6	125 tons/hour, limestone				

Table 1.F
North Mill Dryer Convey System

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-25-C1	North Mill Hopper to Feed Conveyor	130 tons/hour, dry limestone	None	EP CC-25	Yes	25-A-186-S2
EU CC-25-C2	North Mill Feed Conveyor to Dryer	130 tons/hour, dry limestone	None			
EU CC-25-C3	North Mill Dryer Transfer to Convey Inside	130 tons/hour, dry limestone	None			
EU Pile 16	Material Storage Pile 16	389,280 square feet	None	EP CC-25	No	

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in any permit contained in this “Collection of Air Permits.”

- A. The following federal emission limits shall not be exceeded for each of the following emission points and emission units:

**Table 2 – Federal Emission Limits
(New Source Performance Standards)**

ID	Pollutant	Limits	Reference/Basis
EP CC-21 EP CC-22 EP CC-23 EP CC-24	Particulate Matter (PM) – Federal	0.014 gr/dscf ^{1,2}	40 CFR Part 60, Subpart OOO [567 IAC 23.1(2)“bbb”] ³
EU CC-25-C1	Opacity	7% ^{4,5}	
EU CC-25-C2			
EU CC-25-C2			

¹ The emission limit is expressed as the average of three stack test runs.

² Per Table 2 to Subpart OOO of Part 60, the owner or operator shall meet this limit for affected sources **with a capture system** that commenced construction, modification, or reconstruction on or after April 22, 2008.

³ Department’s reference to 40 CFR Part 60, Subpart OOO – *Standards of Performance for Nonmetallic Mineral Processing Plants* [40 CFR §60.670 – 40 CFR §60.676].

⁴ The emission limit is based on a six-minute average.

⁵ Per Table 3 to Subpart OOO of Part 60, the owner or operator shall meet this limit for affected sources **without a capture system** that commenced construction, modification, or reconstruction on or after April 22, 2008.

B. The following emission limits shall not be exceeded for each of the following emission points:

Table 1 - Emission Point Specific Emission Limits

EP ID	Pollutant	lb/hr ¹	Other Limits	Reference/Basis
EP CC-20	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		1.71 ²	NA	Requested
	PM ₁₀	1.71 ³	NA	NAAQS
	PM _{2.5}	0.90 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
	Sulfur Dioxide (SO ₂)	0.04 ²	500 ppmv ¹	567 IAC 23.3(3)“e”
	Nitrogen Oxides (NO _x)	7.70 ²	NA	NA
	Volatile Organic Compounds (VOC)	0.44 ²	NA	NA
	Carbon Monoxide (CO)	6.47 ²	NA	NA
EP CC-21	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.20 ²	NA	Requested
	PM ₁₀	0.20 ³	NA	NAAQS
	PM _{2.5}	0.15 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
EP CC-22	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.86 ²	NA	Requested
	PM ₁₀	0.86 ³	NA	NAAQS
	PM _{2.5}	0.45 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
EP CC-23	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.77 ²	NA	Requested
	PM ₁₀	0.77 ³	NA	NAAQS
	PM _{2.5}	0.40 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”

¹ The emission limit is expressed as the average of three stack test runs.

² Established in Project Number 25-182, per facility’s request, to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability.

³ Established in Project Number 25-182 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ Established in Project Number 25-267 to reduce emissions below the applicable modeling significant emission rate.

⁵ The emission limit is based on a six-minute average.

⁶ An exceedance of the indicator opacity of “no visible emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁷ Established in Project Number 25-182 to maintain potential emissions below “major source” thresholds for purposes of NESHAP applicability.

**Table 2 - Emission Point Specific Emission Limits
(Continued)**

EP ID	Pollutant	lb/hr ¹	Other Limits	Reference/Basis
EP CC-24	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.34 ²	NA	Requested
	PM ₁₀	0.34 ³	NA	NAAQS
	PM _{2.5}	0.20 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
EP CC-25	Particulate Matter (PM) – State	NA	61.0 lb/day ⁷	NA
	PM ₁₀	NA	24.96 lb/day ^{7,8}	NAAQS
	PM _{2.5}	NA	5.04 lb/day ⁷	NA
	Opacity	NA	See Footnote 9	567 IAC 23.3(2)“c”

¹ The emission limit is expressed as the average of three stack test runs.

² Established in Project Number 25-182, per facility’s request, to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability.

³ Established in Project Number 25-182 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ Established in Project Number 25-267 to reduce emissions below the applicable modeling significant emission rate.

⁵ The emission limit is based on a six-minute average.

⁶ An exceedance of the indicator opacity of “no visible emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁷ Established in Project Number 25-225 to keep the project minor for purposes of PSD applicability.

⁸ Established in Project Number 25-225 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the SIP by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁹ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property.

2. Compliance Demonstration(s)

For each Emission Point listed in the “Compliance Demonstrations” table, if an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

**Table 3.A - Compliance Demonstrations
North Mill Dryer System**

EP ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EP CC-20	PM – State	Stack Test ¹	Initial One Time	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
	PM ₁₀ ²	Stack Test ¹	Initial One Time	1 hour	40 CFR 51, Appendix M, 201A with 202
	PM _{2.5} ²	Stack Test ¹	Initial One Time	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9
	SO ₂	None	NA	1 hour	40 CFR 60, Appendix A, Method 6C
	NO _x	None	NA	1 hour	40 CFR 60, Appendix A, Method 7E
	VOC	None	NA	1 hour	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18
	CO	None	NA	1 hour	40 CFR 60, Appendix A, Method 10
	HAP	None	NA	1 hour	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18

¹ The owner or operator shall conduct initial testing on EP CC-20 to demonstrate compliance with the emission limits in Permit Condition 1, Table 3.

² The owner or operator may conduct stack testing for total particulate matter (40 CFR 60, Appendix M, Method 5 and 40 CFR 51, Appendix M, Method 202) to demonstrate compliance with the PM₁₀ and PM_{2.5} emission limits in Permit Condition 1, Table 3.

Table 4.B - Compliance Demonstrations
Emission Points CC-21, CC-22, CC-23, and CC-24

EP ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EP CC-21	PM – Federal	Stack Test ¹	Initial	1 hour	40 CFR 60, Appendix A, Method 5
			One Time		
EP CC-22	PM – State	Stack Test ¹	Initial	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
			One Time		
EP CC-23	PM ₁₀ ²	Stack Test ¹	Initial	1 hour	40 CFR 51, Appendix M, 201A with 202
			One Time		
EP CC-24	PM _{2.5} ²	Stack Test ¹	Initial	1 hour	40 CFR 51, Appendix M, 201A with 202
			One Time		
EP CC-24	Opacity	Visible Emissions Observation ³	NA	1 hour	40 CFR 60, Appendix A, Method 9
			Quarterly ³	30 minutes ³	40 CFR Part 60, Appendix A-7, Method 22

¹ The owner or operator shall conduct initial testing on EP CC-21, EP CC-22, EP CC-23, and EP CC-24 to demonstrate compliance with the applicable emission limits in Permit Condition 1, Tables 2 and 3.

² The owner or operator may conduct stack testing for total particulate matter (*40 CFR 60, Appendix M, Method 5 and 40 CFR 51, Appendix M, Method 202*) to demonstrate compliance with the PM₁₀ and PM_{2.5} emission limits in Permit Condition 1, Table 3.

³ According to 40 CFR §60.674(c) of Subpart OOO, the owner or operator of any affected facility for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses a baghouse to control emissions shall conduct quarterly 30-minute visible emissions inspections using EPA Method 22 (40 CFR Part 60, Appendix A-7). The Method 22 test shall be conducted while the baghouse is operating.

Table 5.C - Compliance Demonstrations
Emission Units CC-25-C1, CC-25-C2, and CC-25-C3

EU ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EU CC-25-C1	Opacity	Visible Emissions Observation ¹	Initial ¹	30 minutes ²	40 CFR 60, Appendix A, Method 9
EU CC-25-C2			Once Every 5 Calendar Years ¹		
EU CC-25-C3					

¹ The owner or operator shall conduct initial and periodic visible emissions observations on Emission Units CC-25-C1, CC-25-C2, EU CC-25-C3 to demonstrate compliance with the emission limit in Permit Condition 1, Table 2.

² According to 40 CFR §60.675(c)(3) of Subpart OOO, when determining compliance with the fugitive emissions standard for any affected facility described under §60.672(b) or §60.672(e)(1) of Subpart OOO, the duration of the Method 9 (40 CFR Part 60, Appendix A-4) observations must be 30 minutes (five 6-minute averages).

Table 6.D - Compliance Demonstrations
Emission Point CC-25

EP ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EP CC-25	PM – State	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
	PM ₁₀	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	PM _{2.5}	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

¹ See Permit Condition 5 for the required recordkeeping requirements.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 21.10(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department for review no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

The emission points shall conform to the specifications listed below:

Table 7 - Emission Point Characteristics

EP ID	Stack Height (feet)	Discharge Style	Stack Opening (inches)	Stack Temperature (°F)	Exhaust Flowrate (scfm)
EP CC-20	30	Vertical, unobstructed	48	200	40,000
EP CC-21	65	Vertical, unobstructed	16	150	4,600
EP CC-22	65	Vertical, unobstructed	32	100	20,000
EP CC-23	30	Vertical, unobstructed	30	68	18,000
EP CC-24	30	Vertical, unobstructed	20	68	8,000
EP CC-25	*	*	*	*	*

* There is no physical stack associated with EP CC-25. Uncaptured emissions are generated during the operation of Emission Units CC-25-C1, CC-25-C2, EU CC-25-C3. Fugitive emissions are generated when the working face of Material Storage Pile 16 is disturbed during facility normal operation.

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

- (1) The North Mill Dryer System (EP CC-20) is not an affected emission unit under Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart UUU (*Standards of Performance for Calciners and Dryers in Mineral Industries*), because it does not process any of the minerals listed in §60.731 of Subpart UUU.
- (2) Material Storage Pile 16 covered by this permit is not an affected emission unit under the federal standards of performance for new stationary sources, as defined in 40 CFR Part 60, because there are no applicable categories at this time.
- (3) The following subparts apply to the emission units and points listed in Table 6.

Table 6 – Applicable NSPS Standards

ID	Subpart	Title	Type	State Reference (567 IAC)	Federal Reference (40 CFR)
EP CC-21 EP CC-22 EP CC-23 EP CC-24	A	General Provisions	NA	23.1(2)	§60.1 – §60.19
EU CC-25-C1 EU CC-25-C2 EU CC-25-C3	OOO	Standards of Performance for Nonmetallic Mineral Processing Plants	Construction, modification, or reconstruction on or after 4/22/2008	23.1(2)“bbb”	§60.670 - §60.676

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (1) This facility (Plant No. 82-01-015) is of the source category affected by 40 CFR Part 63, Subpart AAAAA (*National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants*). However, this facility is not subject to this subpart, because it has been determined under 40 CFR §63.7142 of Subpart AAAAA that this facility is a NESHAP area source.
- (2) Material Storage Pile 16 (EU Pile 16) is not an affected emission unit under NESHAP, because there are no applicable categories at this time.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by these permits shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for these permits shall be:

- A. The owner or operator shall operate the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) as follows:
 - (1) The North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) is restricted to operating with *either* the Old Mill Limestone Milling Facility (EP CC-1) *or* the New Mill Limestone Milling Facility (EP CC-2 and EP CC-5) at any given time. Simultaneous operation with both the Old Mill and Old Mill limestone milling facilities is not allowed.
 - a. The owner or operator shall maintain onsite procedures to ensure the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) operates with only one of the two specified limestone milling facilities at any given time.
 - b. The owner or operator shall maintain daily records including the date, start and stop time of operation, and the name of any limestone milling facility that operated on each calendar day.
 - (2) The North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) is limited to producing no more than 500,000 tons of limestone per 12-month rolling period.
 - a. The owner or operator shall install equipment necessary to monitor the production of the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone, in tons, produced by the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) on a monthly basis.
 - c. The owner or operator shall calculate and record the total limestone, in tons, produced by the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) on a rolling 12-month basis.

- (3) The owner or operator shall conduct visible emissions observations on Emission Points CC-20, CC-21, CC-22, CC-23, and CC-24 once per calendar day. This requirement shall not apply on the days that the associated processing units are not in operation.
 - a. The owner or operator shall record the date and time of the observation and the presence or absence of visible emissions.
 - b. If visible emissions are observed, the owner or operator shall investigate the emission unit or control equipment and make corrections to the associated operations or equipment.
 - c. The owner or operator shall maintain a record of all corrective actions taken.
- (4) The owner or operator shall use natural gas as the only fuel for the North Mill Dryer Burner (EU CC-20-B).
 - a. The owner or operator shall maintain a record of the type of fuel burned in the North Mill Dryer Burner (EU CC-20-B).
 - b. Prior to burning any other fuel in this unit, the owner or operator shall apply for and obtain an amended construction permit from the Department.
- (5) Whenever the North Mill Hopper to Feed Conveyor (EU CC-25-C1), or the North Mill Feed Conveyor to Dryer (EU CC-25-C2), or the North Mill Dryer Transfer to Convey Inside (EU CC-25-C3) is operating, the owner or operator shall take reasonable precautions to prevent the discharge of dust emissions beyond the lot line of the property.
 - a. Reasonable precautions include, but are not limited to:
 - i. The installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials.
 - ii. The use, where practical, of water or chemicals for control of dusts.
- (6) The owner or operator shall operate the loadout spouts as follows:
 - a. Emission Point CC-23 (North Mill Loadout Dust System)
 - i. Simultaneous operation of the North Mill Loadout Spout #3 (EU CC-23-S3) and the North Mill Loadout Spout #4 (EU CC-23-S4) is not allowed; therefore, the owner or operator shall operate either the North Mill Loadout Spout #3 (EU CC-23-S3) *or* the North Mill Loadout Spout #4 (EU CC-23-S4) at one time.
 - ii. Open-bodied product trucks transporting materials from the North Mill Loadout Spout #3 (EU CC-23-S3) *or* the North Mill Loadout Spout #4 (EU CC-23-S4) shall be covered to minimize discharge of dust emissions.

- b. Emission Point CC-24 (North Mill Tank Vent Dust System)
 - i. Simultaneous operation of the North Mill Loadout Spout #5 (EU CC-24-S5) and the North Mill Loadout Spout #6 (EU CC-24-S6) is not allowed; therefore, the owner or operator shall operate either the North Mill Loadout Spout #5 (EU CC-24-S5) *or* the North Mill Loadout Spout #6 (EU CC-24-S6) at one time.
 - ii. Open-bodied product trucks transporting materials from the North Mill Loadout Spout #5 (EU CC-24-S5) *or* the North Mill Loadout Spout #6 (EU CC-24-S6) shall be covered to minimize discharge of dust emissions.
- (7) The owner or operator shall operate, inspect, and maintain Baghouses CC-20, CC-21, CC-22, CC-23, and CC-24 in accordance with the manufacturer's specifications and instructions.
 - a. The owner or operator shall keep a record of all maintenance and inspection activities performed on the control equipment covered by this permit. At a minimum, this record shall include the date that any inspection and/or maintenance was performed; any issues identified during inspection and maintenance activities; the date each issue was resolved; and the identification of the staff member performing the inspection and maintenance activities.
- (8) The owner or operator shall operate Material Storage Pile 16 as follows:
 - a. The maximum area for Material Storage Pile 16 shall not exceed 389,280 square feet.
 - i. The owner or operator shall maintain annual records of the Material Storage Pile 16 area, in square feet.
 - b. The throughput for Material Storage Pile 16 shall not exceed 656,000 tons of limestone per 12-month rolling period.
 - i. The owner or operator shall install equipment necessary to monitor the throughput Material Storage Pile 16. The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - ii. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile 16 on a monthly basis.
 - iii. The owner or operator shall calculate and record the total limestone throughput, in tons, for Material Storage Pile 16 on a rolling 12-month basis.
 - c. During high wind episodes (greater than 12 miles per hour), if visible emissions are observed from the working face of Material Storage Pile 16, the owner or operator shall employ measures to eliminate or minimize emissions. Such measures may include applying dust suppressant or covering the working face of Material Storage Pile 16.
 - i. The owner or operator shall develop a written plan to implement, at a minimum, measures to minimize emissions during high wind episodes (greater than 12 miles per hour).
 - a) The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.

- B. The owner or operator shall comply with the applicable requirements in 40 CFR Part 60, Subpart OOO [*Standards of Performance for Nonmetallic Mineral Processing Plants* (§60.670 - §60.676)], including those not specifically mentioned in this permit.
- (1) Per Table 2 to Subpart OOO of Part 60, the owner or operator shall monitor Baghouses CC-21, CC-22, CC-23, and CC-24 as indicated below.
- a. Per 40 CFR §60.674(c) of Subpart OOO, the owner or operator of any affected emission unit for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses baghouse to control emissions shall conduct quarterly 30-minute visible emissions inspections using EPA Method 22 (40 CFR Part 60, Appendix A-7).
- i. The Method 22 test shall be conducted while the baghouse is operating. The test is successful if no visible emissions are observed. If any visible emissions are observed, the owner or operator shall initiate corrective action within 24 hours to return the baghouse to normal operation.
- ii. The owner or operator shall record each Method 22 test, including the date and any corrective actions taken, in the logbook required under §60.676(b) of Subpart OOO.
- iii. The owner or operator may establish a different baghouse-specific success level for the visible emissions test (other than no visible emissions) by conducting a PM performance test according to §60.675(b) of Subpart OOO simultaneously with a Method 22 to determine what constitutes normal visible emissions from the baghouse when it is in compliance with the applicable PM concentration limit in Table 2 of Subpart OOO. The revised visible emissions success level shall be incorporated into the permit for the affected facility.
- iv. Per 40 CFR §60.674(d) of Subpart OOO, as an alternative to the periodic Method 22 visible emissions inspections specified above, the owner or operator of any affected emission unit for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses a baghouse to control emissions may use a bag leak detection system according to §60.674(d)(1) through (3) of Subpart OOO.
- (2) The owner or operator shall comply with the applicable reporting and recordkeeping requirements in 40 CFR §60.676 of Subpart OOO.

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

8. Department Review

These permits are issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in these permits, any control equipment covered by these permits shall operate at all times when the emission unit(s) covered by these permits are in operation.

These permits are issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause the affected permit or permits to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

9. Owner and Operator Responsibility

These permits are for the construction and operation of specific emission unit(s), control equipment, and emission point(s) as described in these permits and in the applications for these permits. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in these permits conform to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter any of the emission unit(s), or emission point(s), or the associated control equipment without the required amended permit(s).

Any owner or operator of the specified emission unit(s), emission point(s), or associated control equipment, including any person who becomes an owner or operator subsequent to the issuance date of the affected permit(s), is responsible for assuring that the installation, operation, and maintenance of the equipment listed in the permit(s) is in compliance with the provisions of the permit(s) and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

10. Transferability

Unless the equipment is portable, these permits are not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

11. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend the permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) The permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
- (2) This current amendment becomes void.

12. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

13. Notification, Reporting, and Recordkeeping

These requirements shall apply to each permit included in this "Collection of Air Permits" document.

- A. The owner or operator shall furnish the Department the following written notifications:
- (1) In accordance with 567 IAC 22.3(3)"b", dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)"b" shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)"b".
 - (2) In accordance with 567 IAC 22.3(3)"f", when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
 - (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
 - (4) Unless specified, in accordance with a federal regulation, the owner or the owner's authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.
- If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.
- B. The owner or operator shall furnish the Department with the following reports:
- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.
 - (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.
 - (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).

- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

14. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

15. Permit History

Table 7 – Permit History

Project No.	Permit No.	Description	Stack Testing	Issuance Date
25-182	25-A-181	Issue Permit to EP CC-20 (Dryer System)	Yes	09/24/2025
	25-A-182	Issue Permit to EP CC-21 (Milling System)	Yes	
	25-A-183	Issue Permit to EP CC-22 (Inside Dust System)	Yes	
	25-A-184	Issue Permit to EP CC-23 (Loadout Dust System)	Yes	
	25-A-185	Issue Permit to EP CC-24 (Tank Vent Dust System)	Yes	
	25-A-186	Issue Permit to Conveying Units	Yes	
		Move Pile 16 from 18-A-110-S1 to 25-A-186	No	
25-267	25-A-181-S1	Establish PM _{2.5} Emission Limits and Amend the operation of the North Mill Limestone Milling Facility	Yes	10/29/2025
	25-A-182-S1			
	25-A-183-S1			
	25-A-184-S1			
	25-A-185-S1			
	25-A-186-S1			

**Table 7 – Permit History
(Continued)**

Project No.	Permit No.	Description	Stack Testing	Issuance Date
25-225	25-A-186-S2	Increase the area for Material Storage Pile 16; Add annual throughput limit for Material Storage Pile 16, and Amend Emission Limits for Emission Point CC-25	No	12/10/2025

END OF PERMIT



Air Quality Construction Permits Collection of Air Permits

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

(563) 324-1391, Ext. 1140
dosland@linwoodmining.com

401 E Front St
Davenport, IA 52804

Project/Process Description

North Mill Limestone Milling Facility

Equipment Location: 401 E Front St
Davenport, Iowa 52804

Project Number: 25-225

Project Description: Increase the area for Material Storage Pile 16; Add annual throughput limit for Material Storage Pile 16, and Amend Emission Limits for Emission Point CC-25.

Date: December 10, 2025

The permits in this document are issued in accordance with 567 Iowa Administrative Code Chapter 22, and are issued subject to the terms and conditions contained in this document. Issuance of the permits in this document shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law. If any permit contained in this document is modified, superseded, expires, or for any other reason changes or ceases to exist, the status of that permit shall not affect the validity or enforceability of any other permit contained in this document.

Under the Direction of the Director of the
Department of Natural Resources

**List of Emission Units, Control Equipment, Emission Points, and Permits
North Mill Limestone Milling Facility**

**Table 1.A
North Mill Dryer System**

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-20-D	North Mill Dryer	130 tons/hour, dry limestone	Baghouse (CE CC-20)	EP CC-20	Yes	25-A-181-S1
EU CC-20-B	North Mill Dryer Burner	70 million Btu/hour, natural gas				

**Table 1.B
North Mill Milling System**

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-21-M	North Mill Roller Mill	60 tons/hour, dry limestone	Baghouse (CE CC-21)	EP CC-21	Yes	25-A-182-S1
EU CC-21-C	North Mill Roller Mill Cyclone					

**Table 1.C
North Mill Inside Dust System**

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-22-M	North Mill Cage Mill	45 tons/hour, limestone	Baghouse (CE CC-22)	EP CC-22	Yes	25-A-183-S1
EU CC-22-DH	North Mill Dryer Baghouse Hopper	25 tons/hour, limestone				
EU CC-22-RH	North Mill Roller Mill Baghouse Hopper	5 tons/hour, limestone				
EU CC-22-R	North Mill Roller Mill Product	55 tons/hour, limestone				
EU CC-22-CSE	North Mill Transfer System (conveyors, screws, and elevators)	130 tons/hour, limestone				

Table 1.D
North Mill Loadout Dust System

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-23-S3	North Mill Loadout Spout #3	125 tons/hour, limestone	Baghouse (CE CC-23)	EP CC-23	Yes	25-A-184-S1
EU CC-23-S4	North Mill Loadout Spout #4	125 tons/hour, limestone				

Table 1.E
North Mill Tank Vent Dust System

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-24-T7	North Mill Storage Tank #7	1,000 tons, limestone	Baghouse (CE CC-24)	EP CC-24	Yes	25-A-185-S1
EU CC-24-T8	North Mill Storage Tank #8	1,000 tons, limestone				
EU CC-24-B3	North Mill Storage Bin #3	400 tons, limestone				
EU CC-24-B4	North Mill Storage Bin #4	400 tons, limestone				
EU CC-24-B5	North Mill Storage Bin #5	400 tons, limestone				
EU CC-24-B6	North Mill Storage Bin #6	400 tons, limestone				
EU CC-24-S5	North Mill Loadout Spout #5	125 tons/hour, limestone				
EU CC-24-S6	North Mill Loadout Spout #6	125 tons/hour, limestone				

Table 1.F
North Mill Dryer Convey System

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-25-C1	North Mill Hopper to Feed Conveyor	130 tons/hour, dry limestone	None	EP CC-25	Yes	25-A-186-S2
EU CC-25-C2	North Mill Feed Conveyor to Dryer	130 tons/hour, dry limestone	None			
EU CC-25-C3	North Mill Dryer Transfer to Convey Inside	130 tons/hour, dry limestone	None			
EU Pile 16	Material Storage Pile 16	389,280 square feet	None	EP CC-25	No	

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in any permit contained in this “Collection of Air Permits.”

- A. The following federal emission limits shall not be exceeded for each of the following emission points and emission units:

**Table 2 – Federal Emission Limits
(New Source Performance Standards)**

ID	Pollutant	Limits	Reference/Basis
EP CC-21 EP CC-22 EP CC-23 EP CC-24	Particulate Matter (PM) – Federal	0.014 gr/dscf ^{1,2}	40 CFR Part 60, Subpart OOO [567 IAC 23.1(2)“bbb”] ³
EU CC-25-C1	Opacity	7% ^{4,5}	
EU CC-25-C2			
EU CC-25-C2			

¹ The emission limit is expressed as the average of three stack test runs.

² Per Table 2 to Subpart OOO of Part 60, the owner or operator shall meet this limit for affected sources **with a capture system** that commenced construction, modification, or reconstruction on or after April 22, 2008.

³ Department’s reference to 40 CFR Part 60, Subpart OOO – *Standards of Performance for Nonmetallic Mineral Processing Plants* [40 CFR §60.670 – 40 CFR §60.676].

⁴ The emission limit is based on a six-minute average.

⁵ Per Table 3 to Subpart OOO of Part 60, the owner or operator shall meet this limit for affected sources **without a capture system** that commenced construction, modification, or reconstruction on or after April 22, 2008.

B. The following emission limits shall not be exceeded for each of the following emission points:

Table 1 - Emission Point Specific Emission Limits

EP ID	Pollutant	lb/hr ¹	Other Limits	Reference/Basis
EP CC-20	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		1.71 ²	NA	Requested
	PM ₁₀	1.71 ³	NA	NAAQS
	PM _{2.5}	0.90 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
	Sulfur Dioxide (SO ₂)	0.04 ²	500 ppmv ¹	567 IAC 23.3(3)“e”
	Nitrogen Oxides (NO _x)	7.70 ²	NA	NA
	Volatile Organic Compounds (VOC)	0.44 ²	NA	NA
	Carbon Monoxide (CO)	6.47 ²	NA	NA
EP CC-21	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.20 ²	NA	Requested
	PM ₁₀	0.20 ³	NA	NAAQS
	PM _{2.5}	0.15 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
EP CC-22	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.86 ²	NA	Requested
	PM ₁₀	0.86 ³	NA	NAAQS
	PM _{2.5}	0.45 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
EP CC-23	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.77 ²	NA	Requested
	PM ₁₀	0.77 ³	NA	NAAQS
	PM _{2.5}	0.40 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”

¹ The emission limit is expressed as the average of three stack test runs.

² Established in Project Number 25-182, per facility’s request, to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability.

³ Established in Project Number 25-182 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ Established in Project Number 25-267 to reduce emissions below the applicable modeling significant emission rate.

⁵ The emission limit is based on a six-minute average.

⁶ An exceedance of the indicator opacity of “no visible emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁷ Established in Project Number 25-182 to maintain potential emissions below “major source” thresholds for purposes of NESHAP applicability.

**Table 2 - Emission Point Specific Emission Limits
(Continued)**

EP ID	Pollutant	lb/hr ¹	Other Limits	Reference/Basis
EP CC-24	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.34 ²	NA	Requested
	PM ₁₀	0.34 ³	NA	NAAQS
	PM _{2.5}	0.20 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
EP CC-25	Particulate Matter (PM) – State	NA	61.0 lb/day ⁷	NA
	PM ₁₀	NA	24.96 lb/day ^{7,8}	NAAQS
	PM _{2.5}	NA	5.04 lb/day ⁷	NA
	Opacity	NA	See Footnote 9	567 IAC 23.3(2)“c”

¹ The emission limit is expressed as the average of three stack test runs.

² Established in Project Number 25-182, per facility’s request, to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability.

³ Established in Project Number 25-182 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ Established in Project Number 25-267 to reduce emissions below the applicable modeling significant emission rate.

⁵ The emission limit is based on a six-minute average.

⁶ An exceedance of the indicator opacity of “no visible emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁷ Established in Project Number 25-225 to keep the project minor for purposes of PSD applicability.

⁸ Established in Project Number 25-225 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the SIP by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁹ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property.

2. Compliance Demonstration(s)

For each Emission Point listed in the “Compliance Demonstrations” table, if an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

**Table 3.A - Compliance Demonstrations
North Mill Dryer System**

EP ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EP CC-20	PM – State	Stack Test ¹	Initial One Time	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
	PM ₁₀ ²	Stack Test ¹	Initial One Time	1 hour	40 CFR 51, Appendix M, 201A with 202
	PM _{2.5} ²	Stack Test ¹	Initial One Time	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9
	SO ₂	None	NA	1 hour	40 CFR 60, Appendix A, Method 6C
	NO _x	None	NA	1 hour	40 CFR 60, Appendix A, Method 7E
	VOC	None	NA	1 hour	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18
	CO	None	NA	1 hour	40 CFR 60, Appendix A, Method 10
	HAP	None	NA	1 hour	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18

¹ The owner or operator shall conduct initial testing on EP CC-20 to demonstrate compliance with the emission limits in Permit Condition 1, Table 3.

² The owner or operator may conduct stack testing for total particulate matter (*40 CFR 60, Appendix M, Method 5 and 40 CFR 51, Appendix M, Method 202*) to demonstrate compliance with the PM₁₀ and PM_{2.5} emission limits in Permit Condition 1, Table 3.

Table 4.B - Compliance Demonstrations
Emission Points CC-21, CC-22, CC-23, and CC-24

EP ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EP CC-21	PM – Federal	Stack Test ¹	Initial	1 hour	40 CFR 60, Appendix A, Method 5
			One Time		
EP CC-22	PM – State	Stack Test ¹	Initial	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
			One Time		
EP CC-23	PM ₁₀ ²	Stack Test ¹	Initial	1 hour	40 CFR 51, Appendix M, 201A with 202
			One Time		
EP CC-24	PM _{2.5} ²	Stack Test ¹	Initial	1 hour	40 CFR 51, Appendix M, 201A with 202
			One Time		
EP CC-24	Opacity	Visible Emissions Observation ³	NA	1 hour	40 CFR 60, Appendix A, Method 9
			Quarterly ³	30 minutes ³	40 CFR Part 60, Appendix A-7, Method 22

¹ The owner or operator shall conduct initial testing on EP CC-21, EP CC-22, EP CC-23, and EP CC-24 to demonstrate compliance with the applicable emission limits in Permit Condition 1, Tables 2 and 3.

² The owner or operator may conduct stack testing for total particulate matter (*40 CFR 60, Appendix M, Method 5 and 40 CFR 51, Appendix M, Method 202*) to demonstrate compliance with the PM₁₀ and PM_{2.5} emission limits in Permit Condition 1, Table 3.

³ According to 40 CFR §60.674(c) of Subpart OOO, the owner or operator of any affected facility for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses a baghouse to control emissions shall conduct quarterly 30-minute visible emissions inspections using EPA Method 22 (40 CFR Part 60, Appendix A-7). The Method 22 test shall be conducted while the baghouse is operating.

Table 5.C - Compliance Demonstrations
Emission Units CC-25-C1, CC-25-C2, and CC-25-C3

EU ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EU CC-25-C1	Opacity	Visible Emissions Observation ¹	Initial ¹	30 minutes ²	40 CFR 60, Appendix A, Method 9
EU CC-25-C2			Once Every 5 Calendar Years ¹		
EU CC-25-C3					

¹ The owner or operator shall conduct initial and periodic visible emissions observations on Emission Units CC-25-C1, CC-25-C2, EU CC-25-C3 to demonstrate compliance with the emission limit in Permit Condition 1, Table 2.

² According to 40 CFR §60.675(c)(3) of Subpart OOO, when determining compliance with the fugitive emissions standard for any affected facility described under §60.672(b) or §60.672(e)(1) of Subpart OOO, the duration of the Method 9 (40 CFR Part 60, Appendix A-4) observations must be 30 minutes (five 6-minute averages).

Table 6.D - Compliance Demonstrations
Emission Point CC-25

EP ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EP CC-25	PM – State	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
	PM ₁₀	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	PM _{2.5}	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

¹ See Permit Condition 5 for the required recordkeeping requirements.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 21.10(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department for review no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

The emission points shall conform to the specifications listed below:

Table 7 - Emission Point Characteristics

EP ID	Stack Height (feet)	Discharge Style	Stack Opening (inches)	Stack Temperature (°F)	Exhaust Flowrate (scfm)
EP CC-20	30	Vertical, unobstructed	48	200	40,000
EP CC-21	65	Vertical, unobstructed	16	150	4,600
EP CC-22	65	Vertical, unobstructed	32	100	20,000
EP CC-23	30	Vertical, unobstructed	30	68	18,000
EP CC-24	30	Vertical, unobstructed	20	68	8,000
EP CC-25	*	*	*	*	*

* There is no physical stack associated with EP CC-25. Uncaptured emissions are generated during the operation of Emission Units CC-25-C1, CC-25-C2, EU CC-25-C3. Fugitive emissions are generated when the working face of Material Storage Pile 16 is disturbed during facility normal operation.

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

- (1) The North Mill Dryer System (EP CC-20) is not an affected emission unit under Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart UUU (*Standards of Performance for Calciners and Dryers in Mineral Industries*), because it does not process any of the minerals listed in §60.731 of Subpart UUU.
- (2) Material Storage Pile 16 covered by this permit is not an affected emission unit under the federal standards of performance for new stationary sources, as defined in 40 CFR Part 60, because there are no applicable categories at this time.
- (3) The following subparts apply to the emission units and points listed in Table 6.

Table 6 – Applicable NSPS Standards

ID	Subpart	Title	Type	State Reference (567 IAC)	Federal Reference (40 CFR)
EP CC-21 EP CC-22 EP CC-23 EP CC-24	A	General Provisions	NA	23.1(2)	§60.1 – §60.19
EU CC-25-C1 EU CC-25-C2 EU CC-25-C3	OOO	Standards of Performance for Nonmetallic Mineral Processing Plants	Construction, modification, or reconstruction on or after 4/22/2008	23.1(2)“bbb”	§60.670 - §60.676

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (1) This facility (Plant No. 82-01-015) is of the source category affected by 40 CFR Part 63, Subpart AAAAA (*National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants*). However, this facility is not subject to this subpart, because it has been determined under 40 CFR §63.7142 of Subpart AAAAA that this facility is a NESHAP area source.
- (2) Material Storage Pile 16 (EU Pile 16) is not an affected emission unit under NESHAP, because there are no applicable categories at this time.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by these permits shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for these permits shall be:

- A. The owner or operator shall operate the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) as follows:
 - (1) The North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) is restricted to operating with *either* the Old Mill Limestone Milling Facility (EP CC-1) *or* the New Mill Limestone Milling Facility (EP CC-2 and EP CC-5) at any given time. Simultaneous operation with both the Old Mill and Old Mill limestone milling facilities is not allowed.
 - a. The owner or operator shall maintain onsite procedures to ensure the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) operates with only one of the two specified limestone milling facilities at any given time.
 - b. The owner or operator shall maintain daily records including the date, start and stop time of operation, and the name of any limestone milling facility that operated on each calendar day.
 - (2) The North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) is limited to producing no more than 500,000 tons of limestone per 12-month rolling period.
 - a. The owner or operator shall install equipment necessary to monitor the production of the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone, in tons, produced by the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) on a monthly basis.
 - c. The owner or operator shall calculate and record the total limestone, in tons, produced by the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) on a rolling 12-month basis.

- (3) The owner or operator shall conduct visible emissions observations on Emission Points CC-20, CC-21, CC-22, CC-23, and CC-24 once per calendar day. This requirement shall not apply on the days that the associated processing units are not in operation.
 - a. The owner or operator shall record the date and time of the observation and the presence or absence of visible emissions.
 - b. If visible emissions are observed, the owner or operator shall investigate the emission unit or control equipment and make corrections to the associated operations or equipment.
 - c. The owner or operator shall maintain a record of all corrective actions taken.
- (4) The owner or operator shall use natural gas as the only fuel for the North Mill Dryer Burner (EU CC-20-B).
 - a. The owner or operator shall maintain a record of the type of fuel burned in the North Mill Dryer Burner (EU CC-20-B).
 - b. Prior to burning any other fuel in this unit, the owner or operator shall apply for and obtain an amended construction permit from the Department.
- (5) Whenever the North Mill Hopper to Feed Conveyor (EU CC-25-C1), or the North Mill Feed Conveyor to Dryer (EU CC-25-C2), or the North Mill Dryer Transfer to Convey Inside (EU CC-25-C3) is operating, the owner or operator shall take reasonable precautions to prevent the discharge of dust emissions beyond the lot line of the property.
 - a. Reasonable precautions include, but are not limited to:
 - i. The installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials.
 - ii. The use, where practical, of water or chemicals for control of dusts.
- (6) The owner or operator shall operate the loadout spouts as follows:
 - a. Emission Point CC-23 (North Mill Loadout Dust System)
 - i. Simultaneous operation of the North Mill Loadout Spout #3 (EU CC-23-S3) and the North Mill Loadout Spout #4 (EU CC-23-S4) is not allowed; therefore, the owner or operator shall operate either the North Mill Loadout Spout #3 (EU CC-23-S3) *or* the North Mill Loadout Spout #4 (EU CC-23-S4) at one time.
 - ii. Open-bodied product trucks transporting materials from the North Mill Loadout Spout #3 (EU CC-23-S3) *or* the North Mill Loadout Spout #4 (EU CC-23-S4) shall be covered to minimize discharge of dust emissions.

- b. Emission Point CC-24 (North Mill Tank Vent Dust System)
 - i. Simultaneous operation of the North Mill Loadout Spout #5 (EU CC-24-S5) and the North Mill Loadout Spout #6 (EU CC-24-S6) is not allowed; therefore, the owner or operator shall operate either the North Mill Loadout Spout #5 (EU CC-24-S5) *or* the North Mill Loadout Spout #6 (EU CC-24-S6) at one time.
 - ii. Open-bodied product trucks transporting materials from the North Mill Loadout Spout #5 (EU CC-24-S5) *or* the North Mill Loadout Spout #6 (EU CC-24-S6) shall be covered to minimize discharge of dust emissions.
- (7) The owner or operator shall operate, inspect, and maintain Baghouses CC-20, CC-21, CC-22, CC-23, and CC-24 in accordance with the manufacturer's specifications and instructions.
 - a. The owner or operator shall keep a record of all maintenance and inspection activities performed on the control equipment covered by this permit. At a minimum, this record shall include the date that any inspection and/or maintenance was performed; any issues identified during inspection and maintenance activities; the date each issue was resolved; and the identification of the staff member performing the inspection and maintenance activities.
- (8) The owner or operator shall operate Material Storage Pile 16 as follows:
 - a. The maximum area for Material Storage Pile 16 shall not exceed 389,280 square feet.
 - i. The owner or operator shall maintain annual records of the Material Storage Pile 16 area, in square feet.
 - b. The throughput for Material Storage Pile 16 shall not exceed 656,000 tons of limestone per 12-month rolling period.
 - i. The owner or operator shall install equipment necessary to monitor the throughput Material Storage Pile 16. The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - ii. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile 16 on a monthly basis.
 - iii. The owner or operator shall calculate and record the total limestone throughput, in tons, for Material Storage Pile 16 on a rolling 12-month basis.
 - c. During high wind episodes (greater than 12 miles per hour), if visible emissions are observed from the working face of Material Storage Pile 16, the owner or operator shall employ measures to eliminate or minimize emissions. Such measures may include applying dust suppressant or covering the working face of Material Storage Pile 16.
 - i. The owner or operator shall develop a written plan to implement, at a minimum, measures to minimize emissions during high wind episodes (greater than 12 miles per hour).
 - a) The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.

- B. The owner or operator shall comply with the applicable requirements in 40 CFR Part 60, Subpart OOO [*Standards of Performance for Nonmetallic Mineral Processing Plants* (§60.670 - §60.676)], including those not specifically mentioned in this permit.
- (1) Per Table 2 to Subpart OOO of Part 60, the owner or operator shall monitor Baghouses CC-21, CC-22, CC-23, and CC-24 as indicated below.
- a. Per 40 CFR §60.674(c) of Subpart OOO, the owner or operator of any affected emission unit for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses baghouse to control emissions shall conduct quarterly 30-minute visible emissions inspections using EPA Method 22 (40 CFR Part 60, Appendix A-7).
- i. The Method 22 test shall be conducted while the baghouse is operating. The test is successful if no visible emissions are observed. If any visible emissions are observed, the owner or operator shall initiate corrective action within 24 hours to return the baghouse to normal operation.
- ii. The owner or operator shall record each Method 22 test, including the date and any corrective actions taken, in the logbook required under §60.676(b) of Subpart OOO.
- iii. The owner or operator may establish a different baghouse-specific success level for the visible emissions test (other than no visible emissions) by conducting a PM performance test according to §60.675(b) of Subpart OOO simultaneously with a Method 22 to determine what constitutes normal visible emissions from the baghouse when it is in compliance with the applicable PM concentration limit in Table 2 of Subpart OOO. The revised visible emissions success level shall be incorporated into the permit for the affected facility.
- iv. Per 40 CFR §60.674(d) of Subpart OOO, as an alternative to the periodic Method 22 visible emissions inspections specified above, the owner or operator of any affected emission unit for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses a baghouse to control emissions may use a bag leak detection system according to §60.674(d)(1) through (3) of Subpart OOO.
- (2) The owner or operator shall comply with the applicable reporting and recordkeeping requirements in 40 CFR §60.676 of Subpart OOO.

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

8. Department Review

These permits are issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in these permits, any control equipment covered by these permits shall operate at all times when the emission unit(s) covered by these permits are in operation.

These permits are issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause the affected permit or permits to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

9. Owner and Operator Responsibility

These permits are for the construction and operation of specific emission unit(s), control equipment, and emission point(s) as described in these permits and in the applications for these permits. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in these permits conform to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter any of the emission unit(s), or emission point(s), or the associated control equipment without the required amended permit(s).

Any owner or operator of the specified emission unit(s), emission point(s), or associated control equipment, including any person who becomes an owner or operator subsequent to the issuance date of the affected permit(s), is responsible for assuring that the installation, operation, and maintenance of the equipment listed in the permit(s) is in compliance with the provisions of the permit(s) and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

10. Transferability

Unless the equipment is portable, these permits are not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

11. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend the permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) The permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
- (2) This current amendment becomes void.

12. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

13. Notification, Reporting, and Recordkeeping

These requirements shall apply to each permit included in this "Collection of Air Permits" document.

- A. The owner or operator shall furnish the Department the following written notifications:
- (1) In accordance with 567 IAC 22.3(3)"b", dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)"b" shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)"b".
 - (2) In accordance with 567 IAC 22.3(3)"f", when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
 - (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
 - (4) Unless specified, in accordance with a federal regulation, the owner or the owner's authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.
- If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.
- B. The owner or operator shall furnish the Department with the following reports:
- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.
 - (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.
 - (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).

- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

14. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

15. Permit History

Table 7 – Permit History

Project No.	Permit No.	Description	Stack Testing	Issuance Date
25-182	25-A-181	Issue Permit to EP CC-20 (Dryer System)	Yes	09/24/2025
	25-A-182	Issue Permit to EP CC-21 (Milling System)	Yes	
	25-A-183	Issue Permit to EP CC-22 (Inside Dust System)	Yes	
	25-A-184	Issue Permit to EP CC-23 (Loadout Dust System)	Yes	
	25-A-185	Issue Permit to EP CC-24 (Tank Vent Dust System)	Yes	
	25-A-186	Issue Permit to Conveying Units	Yes	
		Move Pile 16 from 18-A-110-S1 to 25-A-186	No	
25-267	25-A-181-S1	Establish PM _{2.5} Emission Limits and Amend the operation of the North Mill Limestone Milling Facility	Yes	10/29/2025
	25-A-182-S1			
	25-A-183-S1			
	25-A-184-S1			
	25-A-185-S1			
	25-A-186-S1			

**Table 7 – Permit History
(Continued)**

Project No.	Permit No.	Description	Stack Testing	Issuance Date
25-225	25-A-186-S2	Increase the area for Material Storage Pile 16; Add annual throughput limit for Material Storage Pile 16, and Amend Emission Limits for Emission Point CC-25	No	12/10/2025

END OF PERMIT



Air Quality Construction Permits Collection of Air Permits

Plant Number: 82-01-015

Company: Linwood Mining & Minerals Corporation

Contact Person:
Darin Osland
Environmental Manager

Responsible Party:
Same

(563) 324-1391, Ext. 1140
dosland@linwoodmining.com

401 E Front St
Davenport, IA 52804

Project/Process Description

North Mill Limestone Milling Facility

Equipment Location: 401 E Front St
Davenport, Iowa 52804

Project Number: 25-225

Project Description: Increase the area for Material Storage Pile 16; Add annual throughput limit for Material Storage Pile 16, and Amend Emission Limits for Emission Point CC-25.

Date: December 10, 2025

The permits in this document are issued in accordance with 567 Iowa Administrative Code Chapter 22, and are issued subject to the terms and conditions contained in this document. Issuance of the permits in this document shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law. If any permit contained in this document is modified, superseded, expires, or for any other reason changes or ceases to exist, the status of that permit shall not affect the validity or enforceability of any other permit contained in this document.

Under the Direction of the Director of the
Department of Natural Resources

**List of Emission Units, Control Equipment, Emission Points, and Permits
North Mill Limestone Milling Facility**

**Table 1.A
North Mill Dryer System**

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-20-D	North Mill Dryer	130 tons/hour, dry limestone	Baghouse (CE CC-20)	EP CC-20	Yes	25-A-181-S1
EU CC-20-B	North Mill Dryer Burner	70 million Btu/hour, natural gas				

**Table 1.B
North Mill Milling System**

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-21-M	North Mill Roller Mill	60 tons/hour, dry limestone	Baghouse (CE CC-21)	EP CC-21	Yes	25-A-182-S1
EU CC-21-C	North Mill Roller Mill Cyclone					

**Table 1.C
North Mill Inside Dust System**

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-22-M	North Mill Cage Mill	45 tons/hour, limestone	Baghouse (CE CC-22)	EP CC-22	Yes	25-A-183-S1
EU CC-22-DH	North Mill Dryer Baghouse Hopper	25 tons/hour, limestone				
EU CC-22-RH	North Mill Roller Mill Baghouse Hopper	5 tons/hour, limestone				
EU CC-22-R	North Mill Roller Mill Product	55 tons/hour, limestone				
EU CC-22-CSE	North Mill Transfer System (conveyors, screws, and elevators)	130 tons/hour, limestone				

Table 1.D
North Mill Loadout Dust System

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-23-S3	North Mill Loadout Spout #3	125 tons/hour, limestone	Baghouse (CE CC-23)	EP CC-23	Yes	25-A-184-S1
EU CC-23-S4	North Mill Loadout Spout #4	125 tons/hour, limestone				

Table 1.E
North Mill Tank Vent Dust System

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-24-T7	North Mill Storage Tank #7	1,000 tons, limestone	Baghouse (CE CC-24)	EP CC-24	Yes	25-A-185-S1
EU CC-24-T8	North Mill Storage Tank #8	1,000 tons, limestone				
EU CC-24-B3	North Mill Storage Bin #3	400 tons, limestone				
EU CC-24-B4	North Mill Storage Bin #4	400 tons, limestone				
EU CC-24-B5	North Mill Storage Bin #5	400 tons, limestone				
EU CC-24-B6	North Mill Storage Bin #6	400 tons, limestone				
EU CC-24-S5	North Mill Loadout Spout #5	125 tons/hour, limestone				
EU CC-24-S6	North Mill Loadout Spout #6	125 tons/hour, limestone				

Table 1.F
North Mill Dryer Convey System

EU ID	Emission Unit Description	Maximum Capacity	CE Description and ID	EP ID	Stack Testing	Permit Number
EU CC-25-C1	North Mill Hopper to Feed Conveyor	130 tons/hour, dry limestone	None	EP CC-25	Yes	25-A-186-S2
EU CC-25-C2	North Mill Feed Conveyor to Dryer	130 tons/hour, dry limestone	None			
EU CC-25-C3	North Mill Dryer Transfer to Convey Inside	130 tons/hour, dry limestone	None			
EU Pile 16	Material Storage Pile 16	389,280 square feet	None	EP CC-25	No	

PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in any permit contained in this “Collection of Air Permits.”

- A. The following federal emission limits shall not be exceeded for each of the following emission points and emission units:

**Table 2 – Federal Emission Limits
(New Source Performance Standards)**

ID	Pollutant	Limits	Reference/Basis
EP CC-21 EP CC-22 EP CC-23 EP CC-24	Particulate Matter (PM) – Federal	0.014 gr/dscf ^{1,2}	40 CFR Part 60, Subpart OOO [567 IAC 23.1(2)“bbb”] ³
EU CC-25-C1	Opacity	7% ^{4,5}	
EU CC-25-C2			
EU CC-25-C2			

¹ The emission limit is expressed as the average of three stack test runs.

² Per Table 2 to Subpart OOO of Part 60, the owner or operator shall meet this limit for affected sources **with a capture system** that commenced construction, modification, or reconstruction on or after April 22, 2008.

³ Department’s reference to 40 CFR Part 60, Subpart OOO – *Standards of Performance for Nonmetallic Mineral Processing Plants* [40 CFR §60.670 – 40 CFR §60.676].

⁴ The emission limit is based on a six-minute average.

⁵ Per Table 3 to Subpart OOO of Part 60, the owner or operator shall meet this limit for affected sources **without a capture system** that commenced construction, modification, or reconstruction on or after April 22, 2008.

B. The following emission limits shall not be exceeded for each of the following emission points:

Table 1 - Emission Point Specific Emission Limits

EP ID	Pollutant	lb/hr ¹	Other Limits	Reference/Basis
EP CC-20	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		1.71 ²	NA	Requested
	PM ₁₀	1.71 ³	NA	NAAQS
	PM _{2.5}	0.90 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
	Sulfur Dioxide (SO ₂)	0.04 ²	500 ppmv ¹	567 IAC 23.3(3)“e”
	Nitrogen Oxides (NO _x)	7.70 ²	NA	NA
	Volatile Organic Compounds (VOC)	0.44 ²	NA	NA
	Carbon Monoxide (CO)	6.47 ²	NA	NA
	Total HAP	0.17 ⁷	NA	NESHAP Area Source
EP CC-21	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.20 ²	NA	Requested
	PM ₁₀	0.20 ³	NA	NAAQS
	PM _{2.5}	0.15 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
EP CC-22	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.86 ²	NA	Requested
	PM ₁₀	0.86 ³	NA	NAAQS
	PM _{2.5}	0.45 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
EP CC-23	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.77 ²	NA	Requested
	PM ₁₀	0.77 ³	NA	NAAQS
	PM _{2.5}	0.40 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”

¹ The emission limit is expressed as the average of three stack test runs.

² Established in Project Number 25-182, per facility’s request, to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability.

³ Established in Project Number 25-182 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ Established in Project Number 25-267 to reduce emissions below the applicable modeling significant emission rate.

⁵ The emission limit is based on a six-minute average.

⁶ An exceedance of the indicator opacity of “no visible emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁷ Established in Project Number 25-182 to maintain potential emissions below “major source” thresholds for purposes of NESHAP applicability.

**Table 2 - Emission Point Specific Emission Limits
(Continued)**

EP ID	Pollutant	lb/hr ¹	Other Limits	Reference/Basis
EP CC-24	Particulate Matter (PM) – State	NA	0.1 gr/dscf ¹	567 IAC 23.3(2)“a”(1)
		0.34 ²	NA	Requested
	PM ₁₀	0.34 ³	NA	NAAQS
	PM _{2.5}	0.20 ⁴	NA	NA
	Opacity	NA	40% ^{5,6}	567 IAC 23.3(2)“d”
EP CC-25	Particulate Matter (PM) – State	NA	61.0 lb/day ⁷	NA
	PM ₁₀	NA	24.96 lb/day ^{7,8}	NAAQS
	PM _{2.5}	NA	5.04 lb/day ⁷	NA
	Opacity	NA	See Footnote 9	567 IAC 23.3(2)“c”

¹ The emission limit is expressed as the average of three stack test runs.

² Established in Project Number 25-182, per facility’s request, to keep the project minor for purposes of the Prevention of Significant Deterioration (PSD) applicability.

³ Established in Project Number 25-182 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the State Implementation Plan (SIP) by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁴ Established in Project Number 25-267 to reduce emissions below the applicable modeling significant emission rate.

⁵ The emission limit is based on a six-minute average.

⁶ An exceedance of the indicator opacity of “no visible emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

⁷ Established in Project Number 25-225 to keep the project minor for purposes of PSD applicability.

⁸ Established in Project Number 25-225 for attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS) as approved into the SIP by the U.S. EPA on March 18, 1999 (64 FR 13343).

⁹ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property.

2. Compliance Demonstration(s)

For each Emission Point listed in the “Compliance Demonstrations” table, if an initial stack test is specified in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) within the applicable time period specified below:

- Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within 90 days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in the “Compliance Demonstrations” table, the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 (Emission Limits) as specified in the “Compliance Demonstrations” table. See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstrations” table unless another testing methodology is approved by the Department before testing.

**Table 3.A - Compliance Demonstrations
North Mill Dryer System**

EP ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EP CC-20	PM – State	Stack Test ¹	Initial One Time	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
	PM ₁₀ ²	Stack Test ¹	Initial One Time	1 hour	40 CFR 51, Appendix M, 201A with 202
	PM _{2.5} ²	Stack Test ¹	Initial One Time	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9
	SO ₂	None	NA	1 hour	40 CFR 60, Appendix A, Method 6C
	NO _x	None	NA	1 hour	40 CFR 60, Appendix A, Method 7E
	VOC	None	NA	1 hour	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18
	CO	None	NA	1 hour	40 CFR 60, Appendix A, Method 10
	HAP	None	NA	1 hour	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18

¹ The owner or operator shall conduct initial testing on EP CC-20 to demonstrate compliance with the emission limits in Permit Condition 1, Table 3.

² The owner or operator may conduct stack testing for total particulate matter (40 CFR 60, Appendix M, Method 5 and 40 CFR 51, Appendix M, Method 202) to demonstrate compliance with the PM₁₀ and PM_{2.5} emission limits in Permit Condition 1, Table 3.

Table 4.B - Compliance Demonstrations
Emission Points CC-21, CC-22, CC-23, and CC-24

EP ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EP CC-21	PM – Federal	Stack Test ¹	Initial	1 hour	40 CFR 60, Appendix A, Method 5
			One Time		
EP CC-22	PM – State	Stack Test ¹	Initial	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
			One Time		
EP CC-23	PM ₁₀ ²	Stack Test ¹	Initial	1 hour	40 CFR 51, Appendix M, 201A with 202
			One Time		
EP CC-24	PM _{2.5} ²	Stack Test ¹	Initial	1 hour	40 CFR 51, Appendix M, 201A with 202
			One Time		
EP CC-24	Opacity	Visible Emissions Observation ³	NA	1 hour	40 CFR 60, Appendix A, Method 9
			Quarterly ³	30 minutes ³	40 CFR Part 60, Appendix A-7, Method 22

¹ The owner or operator shall conduct initial testing on EP CC-21, EP CC-22, EP CC-23, and EP CC-24 to demonstrate compliance with the applicable emission limits in Permit Condition 1, Tables 2 and 3.

² The owner or operator may conduct stack testing for total particulate matter (*40 CFR 60, Appendix M, Method 5 and 40 CFR 51, Appendix M, Method 202*) to demonstrate compliance with the PM₁₀ and PM_{2.5} emission limits in Permit Condition 1, Table 3.

³ According to 40 CFR §60.674(c) of Subpart OOO, the owner or operator of any affected facility for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses a baghouse to control emissions shall conduct quarterly 30-minute visible emissions inspections using EPA Method 22 (40 CFR Part 60, Appendix A-7). The Method 22 test shall be conducted while the baghouse is operating.

Table 5.C - Compliance Demonstrations
Emission Units CC-25-C1, CC-25-C2, and CC-25-C3

EU ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EU CC-25-C1	Opacity	Visible Emissions Observation ¹	Initial ¹	30 minutes ²	40 CFR 60, Appendix A, Method 9
EU CC-25-C2			Once Every 5 Calendar Years ¹		
EU CC-25-C3					

¹ The owner or operator shall conduct initial and periodic visible emissions observations on Emission Units CC-25-C1, CC-25-C2, EU CC-25-C3 to demonstrate compliance with the emission limit in Permit Condition 1, Table 2.

² According to 40 CFR §60.675(c)(3) of Subpart OOO, when determining compliance with the fugitive emissions standard for any affected facility described under §60.672(b) or §60.672(e)(1) of Subpart OOO, the duration of the Method 9 (40 CFR Part 60, Appendix A-4) observations must be 30 minutes (five 6-minute averages).

Table 6.D - Compliance Demonstrations
Emission Point CC-25

EP ID	Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
EP CC-25	PM – State	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
	PM ₁₀	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	PM _{2.5}	Recordkeeping	See Footnote 1	NA	NA
		None	NA	1 hour	40 CFR 51, Appendix M, 201A with 202
	Opacity	None	NA	1 hour	40 CFR 60, Appendix A, Method 9

¹ See Permit Condition 5 for the required recordkeeping requirements.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each compliance test for an air pollutant, excluding opacity, shall consist of three separate runs. The arithmetic mean of three acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Opacity compliance tests shall consist of a minimum of three, 1-hour runs of observations. Opacity shall be determined as the average of any 24 consecutive, 15-second observations from the data set. The opacity observation duration and averaging time requirements apply unless otherwise specified by federal rule, specified in this permit, or granted prior written approval by the Department.

In accordance with 567 IAC 21.10(7)“a”:

- (1) At the Department’s request, a pretest meeting shall be held not later than 15 days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department for review no later than 15 days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting.
- (2) A representative of the Department shall be permitted to witness the tests. In order to allow a Department representative, the opportunity to observe a stack test, each test must begin on a weekday, between the hours of 6 am to 6 pm. Alternative stack test times may be granted through written Department approval prior to testing.
- (3) The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports.

The unit(s) being sampled shall be operated in a normal manner (i.e. not under startup or shutdown conditions) at

- (a) its maximum continuous production or operating rating as rated by the equipment manufacturer, which is listed on either the first page or Condition 3, Emission Point Characteristics, of this permit, or
- (b) a permitted rating listed elsewhere in this permit that is less than the maximum continuous production or operating rating as rated by the equipment manufacturer.

If the compliance test is conducted at less than (a) or (b) above then the owner or operator shall either retest the unit(s) under the conditions of (a) or (b) above or the Department may require additional information or action to determine the unit(s) compliance status with applicable emission limits. This information or action includes, but is not limited to, a permit amendment, additional testing, continuous monitoring, and operating data.

3. Emission Point Characteristics

The emission points shall conform to the specifications listed below:

Table 7 - Emission Point Characteristics

EP ID	Stack Height (feet)	Discharge Style	Stack Opening (inches)	Stack Temperature (°F)	Exhaust Flowrate (scfm)
EP CC-20	30	Vertical, unobstructed	48	200	40,000
EP CC-21	65	Vertical, unobstructed	16	150	4,600
EP CC-22	65	Vertical, unobstructed	32	100	20,000
EP CC-23	30	Vertical, unobstructed	30	68	18,000
EP CC-24	30	Vertical, unobstructed	20	68	8,000
EP CC-25	*	*	*	*	*

* There is no physical stack associated with EP CC-25. Uncaptured emissions are generated during the operation of Emission Units CC-25-C1, CC-25-C2, EU CC-25-C3. Fugitive emissions are generated when the working face of Material Storage Pile 16 is disturbed during facility normal operation.

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

- (1) The North Mill Dryer System (EP CC-20) is not an affected emission unit under Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart UUU (*Standards of Performance for Calciners and Dryers in Mineral Industries*), because it does not process any of the minerals listed in §60.731 of Subpart UUU.
- (2) Material Storage Pile 16 covered by this permit is not an affected emission unit under the federal standards of performance for new stationary sources, as defined in 40 CFR Part 60, because there are no applicable categories at this time.
- (3) The following subparts apply to the emission units and points listed in Table 6.

Table 6 – Applicable NSPS Standards

ID	Subpart	Title	Type	State Reference (567 IAC)	Federal Reference (40 CFR)
EP CC-21 EP CC-22 EP CC-23 EP CC-24	A	General Provisions	NA	23.1(2)	§60.1 – §60.19
EU CC-25-C1 EU CC-25-C2 EU CC-25-C3	OOO	Standards of Performance for Nonmetallic Mineral Processing Plants	Construction, modification, or reconstruction on or after 4/22/2008	23.1(2)“bbb”	§60.670 - §60.676

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (1) This facility (Plant No. 82-01-015) is of the source category affected by 40 CFR Part 63, Subpart AAAAA (*National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants*). However, this facility is not subject to this subpart, because it has been determined under 40 CFR §63.7142 of Subpart AAAAA that this facility is a NESHAP area source.
- (2) Material Storage Pile 16 (EU Pile 16) is not an affected emission unit under NESHAP, because there are no applicable categories at this time.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by any federal regulation, all records as required by these permits shall be available on-site for a minimum of two years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for these permits shall be:

- A. The owner or operator shall operate the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) as follows:
 - (1) The North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) is restricted to operating with *either* the Old Mill Limestone Milling Facility (EP CC-1) *or* the New Mill Limestone Milling Facility (EP CC-2 and EP CC-5) at any given time. Simultaneous operation with both the Old Mill and Old Mill limestone milling facilities is not allowed.
 - a. The owner or operator shall maintain onsite procedures to ensure the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) operates with only one of the two specified limestone milling facilities at any given time.
 - b. The owner or operator shall maintain daily records including the date, start and stop time of operation, and the name of any limestone milling facility that operated on each calendar day.
 - (2) The North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) is limited to producing no more than 500,000 tons of limestone per 12-month rolling period.
 - a. The owner or operator shall install equipment necessary to monitor the production of the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25). The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - b. The owner or operator shall collect and record the total limestone, in tons, produced by the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) on a monthly basis.
 - c. The owner or operator shall calculate and record the total limestone, in tons, produced by the North Mill Limestone Milling Facility (EP CC-20, EP CC-21, EP CC-22, EP CC-23, EP CC-24, and EP CC-25) on a rolling 12-month basis.

- (3) The owner or operator shall conduct visible emissions observations on Emission Points CC-20, CC-21, CC-22, CC-23, and CC-24 once per calendar day. This requirement shall not apply on the days that the associated processing units are not in operation.
 - a. The owner or operator shall record the date and time of the observation and the presence or absence of visible emissions.
 - b. If visible emissions are observed, the owner or operator shall investigate the emission unit or control equipment and make corrections to the associated operations or equipment.
 - c. The owner or operator shall maintain a record of all corrective actions taken.
- (4) The owner or operator shall use natural gas as the only fuel for the North Mill Dryer Burner (EU CC-20-B).
 - a. The owner or operator shall maintain a record of the type of fuel burned in the North Mill Dryer Burner (EU CC-20-B).
 - b. Prior to burning any other fuel in this unit, the owner or operator shall apply for and obtain an amended construction permit from the Department.
- (5) Whenever the North Mill Hopper to Feed Conveyor (EU CC-25-C1), or the North Mill Feed Conveyor to Dryer (EU CC-25-C2), or the North Mill Dryer Transfer to Convey Inside (EU CC-25-C3) is operating, the owner or operator shall take reasonable precautions to prevent the discharge of dust emissions beyond the lot line of the property.
 - a. Reasonable precautions include, but are not limited to:
 - i. The installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials.
 - ii. The use, where practical, of water or chemicals for control of dusts.
- (6) The owner or operator shall operate the loadout spouts as follows:
 - a. Emission Point CC-23 (North Mill Loadout Dust System)
 - i. Simultaneous operation of the North Mill Loadout Spout #3 (EU CC-23-S3) and the North Mill Loadout Spout #4 (EU CC-23-S4) is not allowed; therefore, the owner or operator shall operate either the North Mill Loadout Spout #3 (EU CC-23-S3) *or* the North Mill Loadout Spout #4 (EU CC-23-S4) at one time.
 - ii. Open-bodied product trucks transporting materials from the North Mill Loadout Spout #3 (EU CC-23-S3) *or* the North Mill Loadout Spout #4 (EU CC-23-S4) shall be covered to minimize discharge of dust emissions.

- b. Emission Point CC-24 (North Mill Tank Vent Dust System)
 - i. Simultaneous operation of the North Mill Loadout Spout #5 (EU CC-24-S5) and the North Mill Loadout Spout #6 (EU CC-24-S6) is not allowed; therefore, the owner or operator shall operate either the North Mill Loadout Spout #5 (EU CC-24-S5) *or* the North Mill Loadout Spout #6 (EU CC-24-S6) at one time.
 - ii. Open-bodied product trucks transporting materials from the North Mill Loadout Spout #5 (EU CC-24-S5) *or* the North Mill Loadout Spout #6 (EU CC-24-S6) shall be covered to minimize discharge of dust emissions.
- (7) The owner or operator shall operate, inspect, and maintain Baghouses CC-20, CC-21, CC-22, CC-23, and CC-24 in accordance with the manufacturer's specifications and instructions.
- a. The owner or operator shall keep a record of all maintenance and inspection activities performed on the control equipment covered by this permit. At a minimum, this record shall include the date that any inspection and/or maintenance was performed; any issues identified during inspection and maintenance activities; the date each issue was resolved; and the identification of the staff member performing the inspection and maintenance activities.
- (8) The owner or operator shall operate Material Storage Pile 16 as follows:
- a. The maximum area for Material Storage Pile 16 shall not exceed 389,280 square feet.
 - i. The owner or operator shall maintain annual records of the Material Storage Pile 16 area, in square feet.
 - b. The throughput for Material Storage Pile 16 shall not exceed 656,000 tons of limestone per 12-month rolling period.
 - i. The owner or operator shall install equipment necessary to monitor the throughput Material Storage Pile 16. The monitoring equipment shall be operated and maintained according to the manufacturer's recommendations, instructions, and operating manuals.
 - ii. The owner or operator shall collect and record the total limestone throughput, in tons, for Material Storage Pile 16 on a monthly basis.
 - iii. The owner or operator shall calculate and record the total limestone throughput, in tons, for Material Storage Pile 16 on a rolling 12-month basis.
 - c. During high wind episodes (greater than 12 miles per hour), if visible emissions are observed from the working face of Material Storage Pile 16, the owner or operator shall employ measures to eliminate or minimize emissions. Such measures may include applying dust suppressant or covering the working face of Material Storage Pile 16.
 - i. The owner or operator shall develop a written plan to implement, at a minimum, measures to minimize emissions during high wind episodes (greater than 12 miles per hour).
 - a) The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.

- B. The owner or operator shall comply with the applicable requirements in 40 CFR Part 60, Subpart OOO [*Standards of Performance for Nonmetallic Mineral Processing Plants* (§60.670 - §60.676)], including those not specifically mentioned in this permit.
- (1) Per Table 2 to Subpart OOO of Part 60, the owner or operator shall monitor Baghouses CC-21, CC-22, CC-23, and CC-24 as indicated below.
- a. Per 40 CFR §60.674(c) of Subpart OOO, the owner or operator of any affected emission unit for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses baghouse to control emissions shall conduct quarterly 30-minute visible emissions inspections using EPA Method 22 (40 CFR Part 60, Appendix A-7).
- i. The Method 22 test shall be conducted while the baghouse is operating. The test is successful if no visible emissions are observed. If any visible emissions are observed, the owner or operator shall initiate corrective action within 24 hours to return the baghouse to normal operation.
- ii. The owner or operator shall record each Method 22 test, including the date and any corrective actions taken, in the logbook required under §60.676(b) of Subpart OOO.
- iii. The owner or operator may establish a different baghouse-specific success level for the visible emissions test (other than no visible emissions) by conducting a PM performance test according to §60.675(b) of Subpart OOO simultaneously with a Method 22 to determine what constitutes normal visible emissions from the baghouse when it is in compliance with the applicable PM concentration limit in Table 2 of Subpart OOO. The revised visible emissions success level shall be incorporated into the permit for the affected facility.
- iv. Per 40 CFR §60.674(d) of Subpart OOO, as an alternative to the periodic Method 22 visible emissions inspections specified above, the owner or operator of any affected emission unit for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses a baghouse to control emissions may use a bag leak detection system according to §60.674(d)(1) through (3) of Subpart OOO.
- (2) The owner or operator shall comply with the applicable reporting and recordkeeping requirements in 40 CFR §60.676 of Subpart OOO.

6. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

7. Continuous Monitoring Systems (CMS)

No continuous monitoring systems are required at this time.

8. Department Review

These permits are issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment covered by this permit has been evaluated for conformance with the emission limits in this permit; Iowa Code Chapter 455B; Division II; 567 IAC Chapters 21 – 33; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. Unless stated elsewhere in these permits, any control equipment covered by these permits shall operate at all times when the emission unit(s) covered by these permits are in operation.

These permits are issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause the affected permit or permits to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

9. Owner and Operator Responsibility

These permits are for the construction and operation of specific emission unit(s), control equipment, and emission point(s) as described in these permits and in the applications for these permits. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in these permits conform to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter any of the emission unit(s), or emission point(s), or the associated control equipment without the required amended permit(s).

Any owner or operator of the specified emission unit(s), emission point(s), or associated control equipment, including any person who becomes an owner or operator subsequent to the issuance date of the affected permit(s), is responsible for assuring that the installation, operation, and maintenance of the equipment listed in the permit(s) is in compliance with the provisions of the permit(s) and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

10. Transferability

Unless the equipment is portable, these permits are not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment [567 IAC 22.3(3)“f”].

11. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within 18 months after the permit issuance date; or
- (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within 36 months after the permit issuance date; or
- (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend the permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) The permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
- (2) This current amendment becomes void.

12. Excess Emissions

An incident of excess emissions other than as listed in 567 IAC 21.7(1) is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 21.7.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven days of the onset of the upset condition [See Permit Condition 12.B.(2)].

13. Notification, Reporting, and Recordkeeping

These requirements shall apply to each permit included in this "Collection of Air Permits" document.

- A. The owner or operator shall furnish the Department the following written notifications:
- (1) In accordance with 567 IAC 22.3(3)"b", dates of intended startup, start of construction, and actual equipment startup. All notifications required by 567 IAC 22.3(3)"b" shall be submitted in writing within 30 days following the applicable date and include the information required by 567 IAC 22.3(3)"b".
 - (2) In accordance with 567 IAC 22.3(3)"f", when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
 - a. At least 14 days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
 - b. At least 7 days before equipment relocation.
 - (3) In accordance with 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within 30 days of the occurrence. The notification shall include the following information:
 - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
 - (4) Unless specified, in accordance with a federal regulation, the owner or the owner's authorized agent shall notify the Department in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor [567 IAC 21.10(7)]. The notification shall include:
 - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.
- If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than 30 days.
- B. The owner or operator shall furnish the Department with the following reports:
- (1) In accordance with 567 IAC 21.7(2), an incident of excess emissions as defined in 567 IAC 21.1 shall be reported within eight hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
 - (2) In accordance with 567 IAC 21.7(3), a written report of an incident of excess emissions as defined in 567 IAC 21.1 shall be submitted as a follow-up to all required initial reports to the Department within seven days of the onset of the upset condition.
 - (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 21.7.
 - (4) In accordance with 567 IAC 21.10(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than 30 calendar days following the end of the calendar quarter, on forms provided by the Director.
 - (5) In accordance with 567 IAC 21.10(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.
- C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.).

- D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave, Ste. 200
Des Moines, IA 50321
Telephone: (515) 725-8200

DNR Field Office #6
1023 West Madison Street
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

14. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

15. Permit History

Table 7 – Permit History

Project No.	Permit No.	Description	Stack Testing	Issuance Date
25-182	25-A-181	Issue Permit to EP CC-20 (Dryer System)	Yes	09/24/2025
	25-A-182	Issue Permit to EP CC-21 (Milling System)	Yes	
	25-A-183	Issue Permit to EP CC-22 (Inside Dust System)	Yes	
	25-A-184	Issue Permit to EP CC-23 (Loadout Dust System)	Yes	
	25-A-185	Issue Permit to EP CC-24 (Tank Vent Dust System)	Yes	
	25-A-186	Issue Permit to Conveying Units	Yes	
		Move Pile 16 from 18-A-110-S1 to 25-A-186	No	
25-267	25-A-181-S1	Establish PM _{2.5} Emission Limits and Amend the operation of the North Mill Limestone Milling Facility	Yes	10/29/2025
	25-A-182-S1			
	25-A-183-S1			
	25-A-184-S1			
	25-A-185-S1			
	25-A-186-S1			

**Table 7 – Permit History
(Continued)**

Project No.	Permit No.	Description	Stack Testing	Issuance Date
25-225	25-A-186-S2	Increase the area for Material Storage Pile 16; Add annual throughput limit for Material Storage Pile 16, and Amend Emission Limits for Emission Point CC-25	No	12/10/2025

END OF PERMIT