

**REPORT OF COMPLIANCE SAMPLING INSPECTION (CSI) &  
INDUSTRIAL STORMWATER  
COMPLIANCE EVALUATION INSPECTION (CEI)**

**AT**

**Lehigh Cement Company, LLC  
700 25<sup>th</sup> Street NW  
Mason City, IA 50401**

NPDES NO: IA0001945  
STATE PERMIT NO: 1700100  
&  
NPDES NO: IA0072907  
STATE PERMIT NO: 1700113

November 14-17, 2022

**BY**

**U. S. ENVIRONMENTAL PROTECTION AGENCY  
Region 7  
Enforcement and Compliance Assurance Division (ECAD)**

**INTRODUCTION**

At the request of the Enforcement and Compliance Assurance Division, Water Branch, I conducted a Compliance Sampling Inspection and an Industrial Stormwater Compliance Evaluation Inspection at Lehigh Cement Company, LLC on November 14-17, 2022. The inspection was conducted under the authority of Section 308 of the Clean Water Act (as amended) and in accordance with EPA Region 7 Standard Operating Procedures. This narrative report and attachments present the results of the inspection. This report is written regarding the inspection conducted for NPDES permit IA0001945 unless otherwise stated.

**PARTICIPANTS**

Lehigh Cement Company  
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Bill Stangler, Operations and Maintenance Manager, 641-420-0646

Iowa Department of Natural Resources  
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## **INSPECTION PROCEDURES**

I arrived unannounced at Lehigh Cement Company at approximately 1:00 p.m. on November 14, 2022, and I introduced myself to Ms. Glaza. I presented my credentials and explained the purpose and procedures of the inspection. I then had a short entrance meeting explaining the purpose and procedures of the inspection. During the entrance meeting, I explained to Ms. Glaza that I was going to conduct an inspection of the facility's National Pollutant Discharge Elimination System (NPDES) individual permit which includes the facility's industrial stormwater requirements in lieu of obtaining coverage under the state's general permit. I explained that I would complete a full walk-through inspection of the facility, complete a record review as necessary, and collect samples each day. During my inspection, I completed the Water Compliance Inspection Report (attachment 1) and a facility walk-through with photos (attachment 2).

## **SAMPLING PROCEDURES**

From November 14, 2022, through November 16, 2022, I used an ISCO model 3700 automatic composite sampler to collect 24-hour composite samples of the wastewater treatment plant's (WWTP) influent from the facility's sanitary (WWTP). I suspended a weighted length of new Tygon tubing into the influent box. I connected the other end to the sampler pump and programmed it to collect evenly spaced aliquots every 30 minutes into a clean Nalgene bottle, which was packed in ice. I returned each day to service the sampler. I removed the bottle, agitated its contents and poured them into clean, pre-labeled polyethylene containers for the analysis of biological oxygen demand (BOD) and non-filterable solids (NFS). Each day I collected a grab sample from the same location to measure the pH and temperature using a field meter. The analyses using the field meter were conducted within 15 minutes of collecting the sample. Flow numbers were determined by collecting the facility's daily flow data during my inspection.

From November 14, 2022 through November 16, 2022, I used an ISCO model 3700 automatic composite sampler to collect 24-hour composite samples of the outfall 001 effluent from the facility's WWTP. I inserted a length of new Tygon tubing into the facility's effluent channel. I connected the other end to the sampler pump and programmed it to collect evenly spaced aliquots every 30 minutes into a clean Nalgene bottle, which was packed in ice. I returned each day to service the sampler. I removed the bottle, agitated its contents, and poured them into clean, pre-labeled polyethylene containers for the analysis of carbonaceous biochemical oxygen demand (CBOD), NFS, ammonia (NH<sub>3</sub>), chloride (CL), Sulfate (SO<sub>4</sub>), total kjeldahl nitrogen (TKN), nitrate/nitrite (NO<sub>3</sub>/NO<sub>2</sub>), and total phosphorus (TP). At the time of sampling, I preserved the NH<sub>3</sub>, TKN, NO<sub>3</sub>/NO<sub>2</sub> and TP samples with 5 mL of sulfuric acid (H<sub>2</sub>SO<sub>4</sub>). I

collected a grab sample from the same location to measure the pH and temperature using a field meter. The analyses using the field meter were conducted within 15 minutes of collecting the sample. Flow numbers were determined by collecting the facility's daily flow data during my inspection.

From November 14, 2022, through November 16, 2022, I used an ISCO model 3700 automatic composite sampler to collect 24-hour composite samples of the influent linked to outfall 801. I suspended a weighted length of new Tygon tubing into the influent channel for outfall 801. I connected the other end to the sampler pump and programmed it to collect evenly spaced aliquots every 30 minutes into a clean Nalgene bottle, which was packed in ice. I returned each day to service the sampler. I removed the bottle, agitated its contents and poured them into a clean, pre-labeled polyethylene container for the analysis of NFS. Each day I collected a grab sample from the same location to measure the pH and temperature using a field meter. The analyses using the field meter were conducted within 15 minutes of collecting the sample. Flow numbers were determined by collecting the facility's daily flow data during my inspection.

From November 14, 2022, through November 16, 2022, I collected grab samples from outfalls 002, 014 (homogenizing silos, referred to as "homo silo"), 015 (pre-heat), 016 (power house) and 017 (finish mill). I collected adequate volumes of sample using a glass sampling container and poured them into clean, pre-labeled polyethylene containers for the analysis of NFS. I collected a separate grab sample from the same locations to measure pH and temperature using a field meter. The analyses using the field meter were conducted within 15 minutes of collecting the sample. Flow measurement numbers were determined by collecting the facility's daily flow data during my inspection.

On November 16, 2022, I collected grab samples from outfall 001 for permit number IA0072907. I collected adequate volumes of sample using a glass sampling container and poured them into clean, pre-labeled polyethylene containers for the analysis of NFS, CL, SO<sub>4</sub> and Iron (FE). I collected a separate grab sample from the same location to measure pH and temperature using a field meter. The analyses using the field meter were conducted within 15 minutes of collecting the sample. Flow measurement numbers were determined by collecting the facility's daily flow data during my inspection.

For both days of sampling, I placed the samples I collected on ice in an insulated cooler, sealed the container, and shipped it overnight to the EPA Region 7 Science and Technology Center (STC) for analysis. Electronic field sheets and electronic chain of custody forms were emailed to the STC each day after samples were shipped or. I followed Region 7 Laboratory Services and Applied Science Division (LSASD) standard operating procedures in the collection, packaging, transportation, and handling of the samples.

## **FACILITY DESCRIPTION**

Lehigh Cement Company is a facility that manufactures portland cement. The facility uses the dry method to manufacture portland cement. Raw materials include limestone, clay, foundry sands, coal ash and blast furnace slag. Limestone and clay are mined from on-site quarries on the

northwest portion of the facility's property. The facility's process water is a mixture of groundwater and surface water. Water is collected from two groundwater wells and from the cooling water pond. Process water is only used as non-contact cooling water to cool multiple pieces of equipment in the manufacturing process, and not added as an ingredient in the final material. Process wastewater is discharged through one of four outfalls at the facility, outfalls 002, 005, 006 and 801 (attachment 3). Sanitary wastewater is discharged at outfall 001.

Outfall 001 discharges from the WWTP below the cooling water pond. Outfall 002 discharges non-contact cooling water and stormwater below the cooling water pond. Outfalls 005 and 006 discharge non-contact cooling water and stormwater along the east bank of the cooling water pond. Outfall 801 is a calculated combination of five internal outfalls (013, 014, 015, 016 and 017) which discharges through multiple existing outfalls.

Outfalls 003, 004, 007 and 012 are all stormwater discharges. Outfall 004 is a stormwater outfall from the facility's clay quarry and on-site cement landfill.

Lehigh Cement Company is located on the north side of Mason City, Iowa along US Highway 65. The latitude and longitude of the plant office are 43.177951 and -93.213862, respectively, in Cerro Gordo County, Iowa.

The facility's NPDES permit IA0001945 was issued on February 1, 2022 (attachment 4). The permit expires on January 31, 2027. At the time of inspection, IDNR had issued a stay for the new February 2022 permit (attachment 5), so the facility was operating from their old permit (attachment 6). The old permit was issued September 18, 2000 and expired on September 17, 2005. The permit includes effluent limits for BOD, total suspended solids (TSS), CL, NH<sub>3</sub>, total nitrogen (TN), E. coli and pH for outfall 001. The permit includes effluent limits for TSS and pH for outfalls 002, 004, 007, 012, 013, 014, 015, 016 and 017. Outfalls 013, 014, 015, 016 and 017 also have a limit for change in temperature from the stream intake to discharge. The permit includes effluent limits for FE and pH for outfall 005 and effluent limits for pH for outfall 006.

The facility's NPDES permit IA0072907 was issued on September 1, 2019 (attachment 7). The permit expires on August 31, 2024. The permit includes effluent limits for TSS, pH, CL and FE for outfall 001. The permit also requires the facility to monitor and report flow and SO<sub>4</sub> for outfall 001.

Both permits at the facility were last inspected by the IDNR on February 27, 2018 (attachment 8). The inspection report findings required the facility to comply with permit effluent limits. No other findings were listed.

## **FINDINGS AND OBSERVATIONS**

The following findings were noted during the plant and record review.

### Self-Monitoring Data Review:

After the inspection, I obtained a spreadsheet of the discharge monitoring report (DMR) data for both of Lehigh Cement's permit number IA0001945 and IA0072907 from the Region 7 (R7) Data Team. The spreadsheet contained the information requested from January 2018 through December 2022. I also obtained a list of effluent limit violations from 2019 through 2022 from IDNR. The facility had copies of the remaining DMRs on site. All DMR data obtained for this report can be found on ECAD's official electronic file management system. The facility had 12 effluent violations from 2021 through 2022 (Table #1) for permit number IA0001945. This was noted as item #1 on the Notice of Preliminary Findings (NOPF) that was left on-site.

**Table 1: Reported Effluent Exceedances for NPDES IA0001945:**

| Date     | Outfall | Parameter       | Reported Values | Limits       |
|----------|---------|-----------------|-----------------|--------------|
| 12/31/22 | 001     | 30-day Flow     | .442 mgd        | .006 mgd     |
| 12/31/22 | 001     | Daily flow      | 2.2 mgd         | .009 mgd     |
| 1/31/22  | 001     | 30-day Flow     | .442 mgd        | .006 mgd     |
| 1/31/22  | 001     | Daily flow      | 2.2 mgd         | .009 mgd     |
| 3/31/22  | 001     | TSS             | 50 mg/L         | 30           |
| 3/31/22  | 001     | TSS             | 50 mg/L         | 45           |
| 9/30/22  | 001     | CL              | 780 mg/L        | 629 mg/L     |
| 10/31/22 | 014     | Temp Difference | 4°C             | 3°C          |
| 8/31/22  | 015     | Temp Difference | 4°C             | 3°C          |
| 12/15/22 | 801     | TSS             | 62 lbs/day      | 28.3 lbs/day |
| 11/15/22 | 801     | TSS             | 206 lbs/day     | 28.3 lbs/day |
| 11/15/21 | 801     | TSS             | 83 lbs/day      | 33 lbs/day   |

For NPDES IA0072907 the facility had five effluent violations from 2019 through May 2022 (Table #2). This was noted as item #1 on the Notice of Preliminary Findings (NOPF) that was left on-site.

**Table 2: Reported Effluent Exceedances for NPDES IA0072907:**

| Date     | Outfall | Parameter | Reported Values | Limits       |
|----------|---------|-----------|-----------------|--------------|
| 10/31/19 | 001     | TSS       | 31.7 mg/L       | 30 mg/L      |
| 8/31/22  | 001     | TSS       | 46 mg/L         | 45 mg/L      |
| 5/31/22  | 001     | FE        | 1.06 mg/L       | 1.0 mg/L     |
| 5/31/22  | 001     | FE        | 1.44 mg/L       | 1.0 mg/L     |
| 5/31/22  | 001     | FE        | 8.61 lbs/day    | 6.67 lbs/day |

The DMR data I received from R7 also showed the facility had hundreds of violations for failing

to submit reports. As discussed above, the facility was still operating on their old permit that expired in 2005. The facility's new permit has different sampling requirements than the old permit. Since the new permit had been issued and then stayed, Ms. Bly explained that IDNR's DMR reporting process is set up for the new permit requirements. Since the facility has a stay on the permit, they are still sampling for what is required in the old permit. This led to confusion in submitting data for the old permit on the new DMR spreadsheet, which led to the DMR database showing violations for not submitting data that wasn't actually required. IDNR personnel developed a spreadsheet for the facility so they could understand which parameters must be sampled for from the old permit and which parameters are not required to be sampled for yet (attachment 9). This was noted as item #3 on the NOPF that was left on-site.

## Sample Results

The analytical results from the inspection were received on December 16, 2022, from the Region 7 STC laboratory (attachment 10). This data was not discussed during the exit interview. The analytical results for the samples I collected are presented in Tables 3-6 below. Results for pH and temperature were collected by me at the time of my inspection. Flow measurements were either measured by facility instruments or estimated by facility personnel.

As described in attachment 10, for results followed by a J, the analyte is acceptable; the reported value is an estimate. For results followed by a U, the analyte was not detected at or above the reporting limit. The number that is shown is the reporting limit.

**Table 3: Analytical Results for Effluent Samples Collected During Inspection at Outfall 001 for NPDES Permit IA0001945**

| Parameter      | (November 15)<br>Sample # 1 | (November 16)<br>Sample # 2 | Permit<br>Limits <sup>1</sup> (mg/L) |
|----------------|-----------------------------|-----------------------------|--------------------------------------|
| CBOD (mg/L)    | ND UJ                       | ND                          | 25/40                                |
| NH3 (mg/L)     | 0.192                       | 0.413                       | NA                                   |
| TSS (mg/L)     | 5.31                        | ND                          | 30/45                                |
| CL (mg/L)      | 404J                        | 459J                        | NA                                   |
| SO4 (mg/L)     | 54.0                        | 53.4J                       | NA                                   |
| TP (mg/L)      | 1.42                        | 1.51                        | NA                                   |
| TKN (mg/L)     | 0.668                       | 0.745                       | NA                                   |
| NO3/NO2 (mg/L) | 6.36                        | 7.52                        | NA                                   |
| TN (mg/L)      | 7.03                        | 8.26                        | NA                                   |
| pH (S.U.)      | 6.85                        | 7.24                        | 6.0-9.0                              |
| Temp (°C)      | 14.7                        | 10.6                        | NA                                   |
| Flow (MGD)     | 0.00225                     | 0.00225                     | 0.0090                               |

<sup>1</sup> Permit limits 30-day Averages followed by Daily Maximums. Permit limits for pH are minimum followed by maximum

<sup>2</sup> "ND" denotes a non-detect result

**Table 4: Analytical Results for Influent Samples Collected During Inspection at Outfall 001 for NPDES Permit IA0001945**

| Parameter         | (November 15)<br>Sample # 1 | (November 16)<br>Sample # 2 | Permit<br>Limits <sup>1</sup> (Monthly/<br>Daily) |
|-------------------|-----------------------------|-----------------------------|---------------------------------------------------|
| <b>BOD (mg/L)</b> | 23.4J                       | 57.5                        | N/A                                               |
| <b>TSS (mg/L)</b> | 23.3                        | 47.5                        | N/A                                               |
| <b>pH (S.U.)</b>  | 6.54                        | 7.60                        | N/A                                               |
| <b>Temp (°C)</b>  | 10.1                        | 20.8                        | N/A                                               |
| <b>Flow (MGD)</b> | 2250                        | 2250                        | N/A                                               |

**Table 5: Analytical Results for Effluent Samples Collected During Inspection at Outfalls 002, 801 influent, 014, 015, 016, 017 and calculated results for outfall 801 effluent for for NPDES Permit IA0001945**

| Parameter                  | Outfall      | (November 15)<br>Sample # 1 | (November 16)<br>Sample # 2 | Permit<br>Limits(Monthly/<br>Daily) |
|----------------------------|--------------|-----------------------------|-----------------------------|-------------------------------------|
| <b>TSS (mg/L)</b>          | 002          | ND                          | ND                          | 50 (mg/L)                           |
| <b>pH (S.U.)</b>           | 002          | 6.55                        | 6.95                        | 6.0-9.0 (S.U.)                      |
| <b>TSS (mg/L)</b>          | 801-Influent | 59.4                        | ND                          | NA                                  |
| <b>TSS (Lbs/Day)</b>       | 801-Influent | 455.8                       | ND                          | NA                                  |
| <b>pH (S.U.)</b>           | 801-Influent | 6.52                        | 6.94                        | NA                                  |
| <b>Temp (°C)</b>           | 801-Influent | 3.1                         | 2.7                         | NA                                  |
| <b>TSS (mg/L)</b>          | 014          | 27.1                        | ND                          | NA                                  |
| <b>pH (S.U.)</b>           | 014          | 6.3                         | 6.12                        | NA                                  |
| <b>Temp (°C)</b>           | 014          | 17.1                        | 15.8                        | NA                                  |
| <b>Temp (Change in °C)</b> | 014          | <b>14</b>                   | <b>13.1</b>                 | ≤3°C Change                         |
| <b>Flow (MGD)</b>          | 014          | 0.1                         | 0.1                         | NA                                  |
| <b>TSS (mg/L)</b>          | 015          | 735                         | 16.9                        | NA                                  |
| <b>pH (S.U.)</b>           | 015          | 6.15                        | 7.05                        | NA                                  |
| <b>Temp (°C)</b>           | 015          | 20.0                        | 12.3                        | NA                                  |
| <b>Temp (Change in °C)</b> | 015          | <b>16.9</b>                 | <b>9.6</b>                  | ≤3°C Change                         |
| <b>Flow (MGD)</b>          | 015          | 0.25                        | 0.25                        | NA                                  |
| <b>TSS (mg/L)</b>          | 016          | 6.82                        | ND                          | NA                                  |
| <b>pH (S.U.)</b>           | 016          | 6.17                        | 6.88                        | NA                                  |
| <b>Temp (°C)</b>           | 016          | 12.0                        | 18.2                        | NA                                  |
| <b>Temp (Change in °C)</b> | 016          | <b>8.9</b>                  | <b>15.5</b>                 | ≤3°C Change                         |

|                         |     |                                  |                          |                 |
|-------------------------|-----|----------------------------------|--------------------------|-----------------|
| in °C)                  |     |                                  |                          |                 |
| Flow (MGD)              | 016 | 0.01                             | 0.01                     | NA              |
| TSS (mg/L)              | 017 | 25.4                             | 25.3                     | NA              |
| pH (S.U.)               | 017 | 6.29                             | 6.87                     | NA              |
| Temp (°C)               | 017 | 10.9                             | 10.6                     | NA              |
| Temp (Change in °C)     | 017 | 7.8                              | 7.9                      | ≤3°C Change     |
| Flow (MGD)              | 017 | 0.56                             | 0.56                     | NA              |
| TSS (mg/L) (Calculated) | 801 | 1674.3 (1218.5 w/ net addition*) | 153.3 (no net addition*) | 33.00 (Lbs/Day) |

“ND” denotes a non-detect result

\* Net Addition is explained below

**Table 6: Analytical Results for Effluent Samples Collected During Inspection at Outfall 001, NPDES permit No. IA0072907**

| Parameter  | (November 15)<br>Sample # 1 | (November 16)<br>Sample # 2 | Permit<br>Limits <sup>1</sup> (Monthly/<br>Daily) |
|------------|-----------------------------|-----------------------------|---------------------------------------------------|
| TSS (mg/L) | No Discharge                | 4.4                         | 30/45 (mg/L)                                      |
| CL (mg/L)  | No Discharge                | 126J                        | 389/629 (mg/L)                                    |
| FE (mg/L)  | No Discharge                | ND                          | 1.0/1.0 (mg/L)                                    |
| SO4 (mg/L) | No Discharge                | 629                         | NA                                                |
| pH (S.U.)  | No Discharge                | 6.73                        | 6.5-9.0 (S.U.)                                    |
| Temp (°C)  | No Discharge                | 6.6                         | N/A                                               |
| Flow (MGD) | No Discharge                | 0.044                       | N/A                                               |

EPA sample results from the inspection showed permit exceedances for temperature change at all four internal outfalls that were sampled, on both days of sampling. The sample results also showed effluent exceedances at outfall 801 for TSS on both days of sampling. Effluent exceedances are shown highlighted in red in table #5. The sludge sample collected did not exceed any ceiling limits for 503 metals.

Due to the facility’s new permit being stayed, all EPA sample results were compared to the effluent limits that required by the facility’s old permit. In the facility’s old permit, the facility was required to sample at six internal outfalls (#5 Raw Mill Building, Homogenizing Silos, Preheater Tower, Powerhouse, Proportioning Building, Finish Mill Building). These internal sample sites did not have outfall numbers assigned to them in the old permit. At the time of inspection, the facility was regularly only collecting samples from five internal outfalls (Raw Mill, Homo Silo, Pre-Heat, Power House, Finish Mill). The proportioning building is no longer used, so it does not have an outfall that can be tested. The five currently sampled internal outfalls match what is required for the new permit, thus the outfall numbers used above are from the new permit but refer to the same sample sites. The TSS results from the six (now five) internal outfalls are to be combined to calculate a result for outfall 801. The old permit allows for “net

addition”, which is removing the amount of TSS that is in the influent for outfall 801 (from the cooling water pond). At the time of inspection, outfall 013 (Raw Mill) was unable to be sample due to a plugged sampling line. Due to this, I was only able to sample four of the five internal sample points. This is noted as item #7 in the summary of this report. Using the four sample points at the time of my inspection, the facility still exceeded the effluent limit for TSS. The flow values used to calculate the TSS mass balance values were estimated by facility personnel using their monthly data collected from their ISCO flow meters.

## **Laboratory**

The facility utilizes a contract laboratory for all of their analyses except pH and temperature. The facility utilizes Mason City WWTP Lab, Iowa Certified Lab #218 and Keystone Laboratories, Iowa Certified Lab #905, in Newton Iowa. During the inspection, I reviewed laboratory records to ensure that all analyses complied with requirements of 40 CFR part 136. The facility’s laboratory records from Keystone Laboratories showed that analyses conducted at Keystone were meeting requirements. At the time of inspection, the facility did not have quality assurance/quality control records available for the analyses conducted at the Mason City WWTP Lab. Lab reports from Mason City WWTP were submitted after the inspection and appeared to meet all requirements.

## **Collection System**

The collection system for the facility is private and only collects wastewater and stormwater from the facility property. Sanitary waste is collected from facility buildings and is collected separately from all process wastewaters. Sanitary wastewater flows to the mechanical wastewater plant, is treated and discharged to Calamus Creek.

Process wastewater and stormwater are collected in a combined collection system and discharge from outfalls 002, 005 and 006. The other outfalls are separate from the process wastewater, including outfalls 003, 004, 007, and 012. Outfalls 003, 007 and 012 collect stormwater from around the cement plant, the material storage areas and shipping areas. Outfall 004 collects stormwater from an onsite quarry that is also used as an industrial landfill for disposal of cement kiln dust (CKD) and other cement manufacturing waste.

As discussed above, outfalls 013, 014, 015, 016 and 017 are internal outfall used for the calculation of outfall 801. These internal outfalls flow to either outfall 002, 005 or 006. Outfall 002 and outfall 006 both discharge back into the cooling water pond, where the facility pumps from for cooling water. The permits states, and facility personnel confirmed, that some of the flow from the internal outfalls flows through outfall 002, which does not discharge back into the cooling water pond, but discharges downstream of the pond directly into Calamus Creek. When I asked, facility personnel were unable to state how much of the process wastewater flows to each of the three outfalls, or which of the internal outfalls flowed to which permitted outfall. This was noted as item #2 on the NOPF that was left on-site.

## **Operational and Maintenance**

During the inspection I observed the facility's wastewater treatment system and the facility sampling points (attachment 3). The facility has an activated sludge, extended aeration treatment system that treats all sanitary waste. Wastewater flows through a bar screen to an aeration tank. After aeration, water flows to a clarifier before being discharged. The plant has a chlorination contact chamber after the clarifier, but they are not disinfecting. The new permit has an E. coli limit beginning in 2027. Facility personnel stated that they are investigating adding disinfection to the existing plant.

For NPDES permit #IA0072907, the facility has a carbon dioxide treatment system (photo 31). The facility treats wastewater that leaches from old CKD disposal sites. This water leaches from the capped fill area, flows into a bedrock pond (the pit), where it is held until there is sufficient volume to treat. The pit also collects stormwater from the area of the capped fill area. As needed, dependent mostly on precipitation events, the facility pumps water from the pit for continuous pH monitoring. Carbon dioxide is automatically injected as needed to adjust the pH between 6.5 and 9.0. Flow is measured with a magnetic flow meter and then piped to the Winnebago River where the permitted discharge point is located.

## **Sludge**

Sludge from the clarifier is pumped to a sludge holding tank. A small amount of the sludge is returned to the aeration basin. According to Mr. Stangler, sludge is regularly disposed of at the Mason City WWTP.

## **Stormwater**

During the inspection, I observed the facility's stormwater system. The facility's individual permit has stormwater outfalls listed and stormwater requirements included with the permit. The facility also has coverage under the IDNR General Permit No. 1, Stormwater Discharge Associated with Industrial Activity (Authorization #5436 – 5264). Facility personnel provided me with a copy of the facility's Stormwater Pollution Prevention Plan (SWPPP) upon request (attachment 11). The SWPPP that I was given was prepared on August 26, 2020 and updated in July of 2022. The facility's permit requires that the SWPPP be updated as needed and implemented.

During my inspection, I observed the SWPPP site map to be insufficient as required by the facility's permit. The facility's permits, old and new, require the map to include all structures, impervious areas, each stormwater outfall, an outline of drainage areas of each outfall, within facility boundaries, and prediction of direction of flow. It also requires the map to include all structural control measures, surface water bodies, material locations and locations of identified spills and leaks. The permit also requires the location of multiple industrial activities on the map. At the time of inspection, the facility's map did not include many of these items, including buildings, complete drainage areas, and structural controls. The map also did not include large portions of the facility, including the arch pond/wastewater treatment area, all of the material

storage area north of the facility and the quarry/landfill. This was noted as item #5 on the NOPF that was left on-site.

The IDNR general permit requires that any facility with an industrial waste landfill that does not have a stabilized cover is subject to specific monitoring requirements. The facility has an industrial landfill on-site for disposal of CKD and other approved wastes generated in the manufacturing process (photos 22-24). At the time of my inspection, the facility was not monitoring the stormwater from the landfill. This is noted as item 6 in the summary of this report.

The facility's SWPPP also requires that good housekeeping is maintained. At the time of inspection, I observed multiple areas where CKD and other materials were mixed with storm water and not properly cleaned up (photos 1, 3-6, 11-12 & 21). Some of these areas were cleaned up at the time of inspection (attachment 12). This was noted as item #4 on the NOPF that was left on-site.

## **Summary**

During the exit briefing on November 17 2022 I went over the facility's rights to claim confidential business information. The facility did not make any claims of confidentiality (attachment 13). During the exit briefing, I issued a NOPF for the following (attachment 14):

1. Failure to meet effluent limits.
2. Ensure outfalls are properly described and facility flows are determined for each outfall.
3. Ensure DMRs are submitted correctly with IDNR.
4. Ensure facility maintains good housekeeping for stormwater.
5. Failure to maintain SWPPP and stormwater map up to date.

After the inspection, the following potential finding was determined:

6. Ensure stormwater from industrial landfill is properly sampled as required by the IDNR General Permit No. 1.
7. Failure to maintain sampling equipment for Outfall 013.

The facility did respond directly to the NOPF after the inspection, but were very responsive to any follow-up correspondence.

**BRIAN  
D'ALFONSO**

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-06'00'

Brian D'Alfonso  
Life Scientist

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MORAN  
Date: 2023.01.30 14:18:57  
-06'00'

Nicole Moran  
Section Chief, WB/DWIS

**Attachments:**

1. Water Compliance Inspection Report (4 pages)
2. Digital Photographs with Photo Log (18 pages)
3. Site Maps (3 pages)
4. Lehigh Cement Company New NPDES Permit # IA0001945 (37 pages)
5. Permit #IA0001945 Permit Stay (1 pages)
6. Lehigh Cement Company Old NPDES Permit # IA0001945 (27 pages)
7. Lehigh Cement Company NPDES Permit # IA0072907 (8 pages)
8. IDNR February 27, 2018, Compliance Inspection Reports (11 pages)
9. IDNR Sampling Requirement Spreadsheet (2 pages)
10. Laboratory Analytical Report for Project ID BDA2301 (38 pages)
11. July 2022, Lehigh Cement SWPPP (45 pages)
12. Facility Photo of Stormwater Cleanup (1 page)
13. November 17, 2022, USEPA Confidential Business Information Notice (4 pages)
14. November 17, 2022, NOPF (1 page)

## PHOTO LOG

**Facility Name / Address:** Lehigh Cement Company, LLC  
700 25<sup>th</sup> Street  
Mason City, Iowa 50401

**Facility EPA ID#:** IA0001945

**State ID#:** IA0001945

**Date:** November 14-17, 2022

**Image Numbers:** DSCN4088 – DSCN4118

**Photographer:** Brian D’Alfonso

**Type of Camera:** Nikon Coolpix AW100, Serial #: 32157507

**All digital photos were copied by:** Brian D’Alfonso on December 4, 2022

**All digital photos were copied to:** CD-R

**Original copy is stored in:** OneDrive. Digital photos were downloaded to the ECAD record management system by Brian D’Alfonso. No changes were made in the original image files prior to storage on OneDrive.

| Report Photo # | Photographer    | Date     | Approx. Time | Flashcard Name (DSCNxxxx.JPG) | Description                                                                                                               |
|----------------|-----------------|----------|--------------|-------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| 1.             | Brian D’Alfonso | 11-15-22 | 10:09        | DSCN4088                      | Facility’s street sweepers to help keep material out of stormwater. The material on the ground is cement kiln dust (CKD). |
| 2.             | Brian D’Alfonso | 11-15-22 | 10:12        | DSCN4089                      | Outdoor drum storage. Some containers were full, some were empty. There was no evidence of any spills.                    |
| 3.             | Brian D’Alfonso | 11-15-22 | 10:13        | DSCN4090                      | Stormwater waddle protecting a stormwater inlet. The material on the ground around is CKD.                                |
| 4.             | Brian D’Alfonso | 11-15-22 | 10:17        | DSCN4091                      | General photo of the facility. Material on the ground is CKD mixed with snow.                                             |
| 5.             | Brian D’Alfonso | 11-15-22 | 10:17        | DSCN4092                      | A stormwater waddle protecting the stormwater inlet. The material on the ground is CKD.                                   |
| 6.             | Brian D’Alfonso | 11-15-22 | 10:19        | DSCN4093                      | A stormwater waddle protecting the stormwater inlet. The material on the ground is CKD.                                   |
| 7.             | Brian D’Alfonso | 11-15-22 | 10:31        | DSCN4094                      | Overview shot of the facility, facing west, from the top of the mill.                                                     |
| 8.             | Brian D’Alfonso | 11-15-22 | 10:31        | DSCN4095                      | Overview shot of the facility, facing west, from the top of the mill.                                                     |
| 9.             | Brian D’Alfonso | 11-15-22 | 10:33        | DSCN4096                      | Overview shot of the facility, facing east, from the top of the mill.                                                     |
| 10.            | Brian D’Alfonso | 11-15-22 | 10:33        | DSCN4097                      | Overview shot of the facility, facing east, from the top of the mill.                                                     |
| 11.            | Brian D’Alfonso | 11-15-22 | 10:46        | DSCN4098                      | CKD and water                                                                                                             |
| 12.            | Brian D’Alfonso | 11-15-22 | 10:56        | DSCN4099                      | CKD on ground                                                                                                             |
| 13.            | Brian D’Alfonso | 11-15-22 | 11:00        | DSCN4100                      | Stormwater collection basin                                                                                               |
| 14.            | Brian D’Alfonso | 11-15-22 | 11:00        | DSCN4101                      | Overview of stormwater flow to the stormwater collection area in photo 13.                                                |
| 15.            | Brian D’Alfonso | 11-15-22 | 11:01        | DSCN4102                      | Stormwater collection pit                                                                                                 |
| 16.            | Brian           | 11-15-22 | 11:01        | DSCN4103                      | Stormwater collection pit from photo 15                                                                                   |

## Photo Log

## Lehigh Cement Company, LLC

11/14-17/2022

| Report Photo # | Photographer    | Date     | Approx. Time | Flashcard Name (DSCNxxxx.JPG) | Description                                                                                                       |
|----------------|-----------------|----------|--------------|-------------------------------|-------------------------------------------------------------------------------------------------------------------|
|                | D'Alfonso       |          |              |                               |                                                                                                                   |
| 17.            | Brian D'Alfonso | 11-15-22 | 11:05        | DSCN4104                      | Outfall 002 sampling point and stormwater collection pit                                                          |
| 18.            | Brian D'Alfonso | 11-15-22 | 11:06        | DSCN4105                      | Overview of outfall 002 sampling point                                                                            |
| 19.            | Brian D'Alfonso | 11-15-22 | 11:43        | DSCN4106                      | Stormwater collection ditch along north side of facility                                                          |
| 20.            | Brian D'Alfonso | 11-15-22 | 11:43        | DSCN4107                      | Opposite direction of stormwater collection ditch in photo 19. Overflow pipe can be seen at the end of the ditch. |
| 21.            | Brian D'Alfonso | 11-15-22 | 15:06        | DSCN4108                      | Discolored stormwater at the facility. Was later cleaned up by facility personnel.                                |
| 22.            | Brian D'Alfonso | 11-16-22 | 10:54        | DSCN4109                      | Area of run-on around the landfill                                                                                |
| 23.            | Brian D'Alfonso | 11-16-22 | 10:54        | DSCN4110                      | Area around the landfill                                                                                          |
| 24.            | Brian D'Alfonso | 11-16-22 | 10:54        | DSCN4111                      | Haul road going into the landfill. CKD landfill in the background.                                                |
| 25.            | Brian D'Alfonso | 11-16-22 | 11:00        | DSCN4112                      | Drainage area from landfill (outfall 004) to the cooling pond.                                                    |
| 26.            | Brian D'Alfonso | 11-16-22 | 11:01        | DSCN4113                      | Opposite direction from photo 25 facing the plant. Discharge from outfall 004 flows to the cooling pond.          |
| 27.            | Brian D'Alfonso | 11-16-22 | 11:07        | DSCN4114                      | Outfall 001 and 012                                                                                               |
| 28.            | Brian D'Alfonso | 11-16-22 | 11:25        | DSCN4115                      | Drainage collection ditch along south side of craneway storage building.                                          |
| 29.            | Brian D'Alfonso | 11-16-22 | 11:27        | DSCN4116                      | Drainage collection ditch along south side of craneway storage building. Opposite direction of photo 28.          |
| 30.            | Brian D'Alfonso | 11-16-22 | 11:27        | DSCN4117                      | Same collection ditch as photos 28/29.                                                                            |
| 31.            | Brian D'Alfonso | 11-16-22 | 14:22        | DSCN4118                      | Liquid carbon dioxide tank at treatment facility for permit #IA0072907.                                           |

**Lehigh Cement Company, LLC**  
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|                                                            |              |                                                                                                                           |                  |
|------------------------------------------------------------|--------------|---------------------------------------------------------------------------------------------------------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection<br><br>Direction: S | DESCRIPTION  | Facility's street sweepers to help keep material out of stormwater. The material on the ground is cement kiln dust (CKD). | 1                |
|                                                            | PHOTOGRAPHER | Brian D'Alfonso                                                                                                           | Date<br>11-15-22 |



|                                                            |              |                                                                                                        |                  |
|------------------------------------------------------------|--------------|--------------------------------------------------------------------------------------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection<br><br>Direction: N | DESCRIPTION  | Outdoor drum storage. Some containers were full, some were empty. There was no evidence of any spills. | 2                |
|                                                            | PHOTOGRAPHER | Brian D'Alfonso                                                                                        | Date<br>11-15-22 |

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|                                                            |              |                                                                                            |                  |
|------------------------------------------------------------|--------------|--------------------------------------------------------------------------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection<br><br>Direction: D | DESCRIPTION  | Stormwater waddle protecting a stormwater inlet. The material on the ground around is CKD. | 3                |
|                                                            | PHOTOGRAPHER | Brian D'Alfonso                                                                            | Date<br>11-15-22 |



|                                                            |              |                                                                               |                  |
|------------------------------------------------------------|--------------|-------------------------------------------------------------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection<br><br>Direction: N | DESCRIPTION  | General photo of the facility. Material on the ground is CKD mixed with snow. | 4                |
|                                                            | PHOTOGRAPHER | Brian D'Alfonso                                                               | Date<br>11-15-22 |

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|                                                            |              |                                                                                         |                  |
|------------------------------------------------------------|--------------|-----------------------------------------------------------------------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection<br><br>Direction: D | DESCRIPTION  | A stormwater waddle protecting the stormwater inlet. The material on the ground is CKD. | 5                |
|                                                            | PHOTOGRAPHER | Brian D'Alfonso                                                                         | Date<br>11-15-22 |



|                                                            |              |                                                                                         |                  |
|------------------------------------------------------------|--------------|-----------------------------------------------------------------------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection<br><br>Direction: D | DESCRIPTION  | A stormwater waddle protecting the stormwater inlet. The material on the ground is CKD. | 6                |
|                                                            | PHOTOGRAPHER | Brian D'Alfonso                                                                         | Date<br>11-15-22 |

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|                                                             |              |                                                                       |                  |
|-------------------------------------------------------------|--------------|-----------------------------------------------------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection<br><br>Direction: NW | DESCRIPTION  | Overview shot of the facility, facing west, from the top of the mill. | 7                |
|                                                             | PHOTOGRAPHER | Brian D'Alfonso                                                       | Date<br>11-15-22 |



|                                                             |              |                                                                       |                  |
|-------------------------------------------------------------|--------------|-----------------------------------------------------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection<br><br>Direction: SW | DESCRIPTION  | Overview shot of the facility, facing west, from the top of the mill. | 8                |
|                                                             | PHOTOGRAPHER | Brian D'Alfonso                                                       | Date<br>11-15-22 |

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|                                                             |              |                                                                       |                  |
|-------------------------------------------------------------|--------------|-----------------------------------------------------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection<br><br>Direction: SE | DESCRIPTION  | Overview shot of the facility, facing east, from the top of the mill. | 9                |
|                                                             | PHOTOGRAPHER | Brian D'Alfonso                                                       | Date<br>11-15-22 |



|                                                             |              |                                                                       |                  |
|-------------------------------------------------------------|--------------|-----------------------------------------------------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection<br><br>Direction: NE | DESCRIPTION  | Overview shot of the facility, facing east, from the top of the mill. | 10               |
|                                                             | PHOTOGRAPHER | Brian D'Alfonso                                                       | Date<br>11-15-22 |

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|                                                            |              |                 |                  |
|------------------------------------------------------------|--------------|-----------------|------------------|
| Compliance<br>Evaluation<br>Inspection<br><br>Direction: D | DESCRIPTION  | CKD and water   | 11               |
|                                                            | PHOTOGRAPHER | Brian D'Alfonso | Date<br>11-15-22 |



|                                                              |              |                 |                  |
|--------------------------------------------------------------|--------------|-----------------|------------------|
| Compliance<br>Evaluation<br>Inspection<br><br>Direction: Unk | DESCRIPTION  | CKD on ground   | 12               |
|                                                              | PHOTOGRAPHER | Brian D'Alfonso | Date<br>11-15-22 |

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|                                        |              |                             |                  |
|----------------------------------------|--------------|-----------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection | DESCRIPTION  | Stormwater collection basin | 13               |
|                                        | PHOTOGRAPHER | Brian D'Alfonso             | Date<br>11-15-22 |



|                                        |              |                                                                            |                  |
|----------------------------------------|--------------|----------------------------------------------------------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection | DESCRIPTION  | Overview of stormwater flow to the stormwater collection area in photo 13. | 14               |
|                                        | PHOTOGRAPHER | Brian D'Alfonso                                                            | Date<br>11-15-22 |

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|                                        |              |                           |                  |
|----------------------------------------|--------------|---------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection | DESCRIPTION  | Stormwater collection pit | 15               |
|                                        | PHOTOGRAPHER | Brian D'Alfonso           | Date<br>11-15-22 |



|                                        |              |                                         |                  |
|----------------------------------------|--------------|-----------------------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection | DESCRIPTION  | Stormwater collection pit from photo 15 | 16               |
|                                        | PHOTOGRAPHER | Brian D'Alfonso                         | Date<br>11-15-22 |

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|                                        |              |                                                          |                  |
|----------------------------------------|--------------|----------------------------------------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection | DESCRIPTION  | Outfall 002 sampling point and stormwater collection pit | 17               |
|                                        | PHOTOGRAPHER | Brian D'Alfonso                                          | Date<br>11-15-22 |



|                                        |              |                                        |                 |
|----------------------------------------|--------------|----------------------------------------|-----------------|
| Compliance<br>Evaluation<br>Inspection | DESCRIPTION  | Overview of outfall 002 sampling point | 18              |
|                                        | PHOTOGRAPHER | Brian D'Alfonso                        | Date<br>1-15-22 |

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|                                                             |              |                                                          |                  |
|-------------------------------------------------------------|--------------|----------------------------------------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection<br><br>Direction: SE | DESCRIPTION  | Stormwater collection ditch along north side of facility | 19               |
|                                                             | PHOTOGRAPHER | Brian D'Alfonso                                          | Date<br>11-15-22 |



|                                                             |              |                                                                                                                   |                  |
|-------------------------------------------------------------|--------------|-------------------------------------------------------------------------------------------------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection<br><br>Direction: SW | DESCRIPTION  | Opposite direction of stormwater collection ditch in photo 19. Overflow pipe can be seen at the end of the ditch. | 20               |
|                                                             | PHOTOGRAPHER | Brian D'Alfonso                                                                                                   | Date<br>11-15-22 |

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|                                        |              |                                                                                    |                  |
|----------------------------------------|--------------|------------------------------------------------------------------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection | DESCRIPTION  | Discolored stormwater at the facility. Was later cleaned up by facility personnel. | 21               |
|                                        | PHOTOGRAPHER | Brian D'Alfonso                                                                    | Date<br>11-15-22 |



|                                        |              |                                    |                  |
|----------------------------------------|--------------|------------------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection | DESCRIPTION  | Area of run-on around the landfill | 22               |
|                                        | PHOTOGRAPHER | Brian D'Alfonso                    | Date<br>11-16-22 |

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|                                        |              |                          |                  |
|----------------------------------------|--------------|--------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection | DESCRIPTION  | Area around the landfill | 23               |
|                                        | PHOTOGRAPHER | Brian D'Alfonso          | Date<br>11-16-22 |



|                                        |              |                                                                    |                  |
|----------------------------------------|--------------|--------------------------------------------------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection | DESCRIPTION  | Haul road going into the landfill. CKD landfill in the background. | 24               |
|                                        | PHOTOGRAPHER | Brian D'Alfonso                                                    | Date<br>11-16-22 |

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|                                        |              |                                                                |          |
|----------------------------------------|--------------|----------------------------------------------------------------|----------|
| Compliance<br>Evaluation<br>Inspection | DESCRIPTION  | Drainage area from landfill (outfall 004) to the cooling pond. | 25       |
|                                        |              |                                                                | Date     |
| Direction: NW                          | PHOTOGRAPHER | Brian D'Alfonso                                                | 11-16-22 |



|                                        |              |                                                                                                          |          |
|----------------------------------------|--------------|----------------------------------------------------------------------------------------------------------|----------|
| Compliance<br>Evaluation<br>Inspection | DESCRIPTION  | Opposite direction from photo 25 facing the plant. Discharge from outfall 004 flows to the cooling pond. | 26       |
|                                        |              |                                                                                                          | Date     |
| Direction: SE                          | PHOTOGRAPHER | Brian D'Alfonso                                                                                          | 11-16-22 |

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|                                                             |              |                     |                  |
|-------------------------------------------------------------|--------------|---------------------|------------------|
| Compliance<br>Evaluation<br>Inspection<br><br>Direction: NE | DESCRIPTION  | Outfall 001 and 012 | 27               |
|                                                             | PHOTOGRAPHER | Brian D'Alfonso     | Date<br>11-16-22 |



|                                                            |              |                                                                          |                  |
|------------------------------------------------------------|--------------|--------------------------------------------------------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection<br><br>Direction: E | DESCRIPTION  | Drainage collection ditch along south side of craneway storage building. | 28               |
|                                                            | PHOTOGRAPHER | Brian D'Alfonso                                                          | Date<br>11-16-22 |

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|                                        |              |                                                                                                             |                  |
|----------------------------------------|--------------|-------------------------------------------------------------------------------------------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection | DESCRIPTION  | Drainage collection ditch along south side of craneway storage building.<br>Opposite direction of photo 28. | 29               |
|                                        | PHOTOGRAPHER | Brian D'Alfonso                                                                                             | Date<br>11-16-22 |



|                                        |              |                                        |                  |
|----------------------------------------|--------------|----------------------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection | DESCRIPTION  | Same collection ditch as photos 28/29. | 30               |
|                                        | PHOTOGRAPHER | Brian D'Alfonso                        | Date<br>11-16-22 |

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|                                        |              |                                                                         |                  |
|----------------------------------------|--------------|-------------------------------------------------------------------------|------------------|
| Compliance<br>Evaluation<br>Inspection | DESCRIPTION  | Liquid carbon dioxide tank at treatment facility for permit #IA0072907. | 31               |
|                                        | PHOTOGRAPHER | Brian D'Alfonso                                                         | Date<br>11-16-22 |

|                                        |              |                 |      |
|----------------------------------------|--------------|-----------------|------|
| Compliance<br>Evaluation<br>Inspection | DESCRIPTION  |                 | 20   |
|                                        | PHOTOGRAPHER | Brian D'Alfonso | Date |