



Air Quality Permitting Response to Public Comments

November 30, 2016

Permit to Construct No. P-2016.0033

Project No. 61734

**Nu-West Industries, Inc. dba Agrium - Rasmussen Valley
Mine
Soda Springs, Idaho**

Facility ID No. 029-00044

Prepared by:
Craig Woodruff, Permit Writer *CW*
AIR QUALITY DIVISION

Final

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BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed permit to construct the Nu-West Industries, Inc. dba Agrium - Rasmussen Valley Mine from October 20, 2016 through November 21, 2016, in accordance with IDAPA 58.01.01.209.01.c. During this period, comments were submitted in response to DEQ's proposed action. Each comment and DEQ's response is provided in the following section. All comments submitted in response to DEQ's proposed action are included in the appendix of this document.

PUBLIC COMMENTS AND RESPONSES

Public comments regarding the technical and regulatory analyses and the air quality aspects of the proposed permit are summarized below. Questions, comments, and/or suggestions received during the comment period that did not relate to the air quality aspects of the permit application, the Department's technical analysis, or the proposed permit are not addressed. For reference purposes, a copy of the Rules for the Control of Air Pollution in Idaho can be found at: <http://adminrules.idaho.gov/rules/current/58/0101.pdf>.

Comment 1: Each haul road has an uncontrolled PTE of 180 T/yr for PM, though this number is reduced to 18.03 T/yr for each source in controlled PTE estimates. This reduction is presumably attributable to the application of water for dust suppression from two wells on site, though it is unclear what volume of water will be required to maintain such a large deficit of PM emissions from the haul roads. We are concerned over potential runoff into surrounding surface water bodies resulting from the application of water for dust suppression. We believe it would be prudent to either limit the application of dust suppressant to a level that does not result in saturated conditions resulting in ponding on the surface or to require a runoff management plan as part of this permit. The runoff management plan could be similar in nature to the fugitive dust control plan, which requires operators to take all reasonable precautions to ensure runoff does not enter surrounding water bodies and to conduct facility-wide inspections each day the mine is operating.

Response 1: **DEQ requires that all reasonable precautions be taken to control fugitive dust emissions. For roadways one of the possible strategies is application of water. In practice, application of water on roadways to control fugitive dust does not result in ponding, thereby limiting the potential for runoff. DEQ may only comment on the air quality related questions for this air permit.**

EPA's National Pollutant Discharge Elimination System (NPDES) regulates storm water and surface water pollution potential. The following link provides a general permit that includes discussion of dust suppression associated with mining activities that may apply to this facility:

https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015_finalpermit.pdf

For further assistance in determining the regulations associated with surface water runoff potential please contact EPA Region 10.

Appendix
Public Comments Submitted for
Permit to Construct
P-2016.0033



208.345.6933 • PO Box 844, Boise, ID 83702 • www.idahoconservation.org

11/21/2016

Anne Drier
Air Quality Division
DEQ State Office
1410 N. Hilton
Boise, ID 83706

Craig Woodruff
Air Quality Division
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1410 N. Hilton
Boise, ID 83706

Submitted via email: anne.drier@deq.idaho.gov and William.rogers@deq.idaho.gov

RE: Air Quality PTC for Nu-West Industries

Dear Ms. Drier and Mr. Woodruff;

Thank you for the opportunity to comment on the proposed air quality permit to construct for Nu-West Industries' Rasmussen Valley Mine (RMV) near Soda Springs, ID.

Since 1973, the Idaho Conservation League has been Idaho's leading voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, many of whom have a deep personal interest in protecting Idaho's air and water quality.

The RMV site is located at the southern end of Rasmussen Ridge and bordered by Angus Creek to the west and the Blackfoot River to the south and east. The emission inventory compiled for the proposed air permit for the RMV lists emissions from twelve (12) compression ignition (CI) engines and fourteen (14) fugitive emissions sources. With regards to PM, fugitive emissions from the haul roads to the overburden pile and ore stockpile/lease boundary comprise the vast majority of emissions, each contributing 46% to the total post-project potential to emit (PTE).

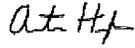
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RE: Idaho Conservation League comments on proposed permit to construct for Nu-West Industries Rasmussen Valley Mine

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Sincerely,



Austin Hopkins
Conservation Assistant