



# **Air Quality Permitting Response to Public Comments**

**September 9, 2016**

**Permit to Construct No. P-2016.0025**

**P-4 Quartzite Quarry  
Soda Springs, Idaho**

**Facility ID No. 029-00043**

Prepared by:

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AIR QUALITY DIVISION

**Final**

## Table of Contents

1. BACKGROUND .....	3
2. PUBLIC COMMENTS AND RESPONSES .....	3
APPENDIX .....	5

## BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed permit to construct the P-4 Quartzite Quarry from July 28 through August 29, 2016, in accordance with IDAPA 58.01.01.209.01.c. and 40 CFR 60, Subpart OOO. 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: Permit Condition 2.4 the facility is inquiring the frequency of monitoring for 20% opacity measurement.

**Response 1: There is no monitoring required for Permit Condition 2.4. This permit condition enables a DEQ inspector to check the compliance status of the stack at any time.**

Comment 2: The primary crusher throughput monitoring requirement in Permit Conditions 2.5 and 2.7: language needs simplified to allow the operator with the flexibility to utilize other than 68-ton capacity trucks without seeking a permit modification. This flexibility is required to account for equipment breakdowns or upgrades, or utilizing third-party or subcontractor trucks.

**Response 2: Permit Condition 2.7 has been simplified to allow for alternate methods of monitoring the throughput of the primary jaw crusher.**

Comment 3: For Permit Condition 2.6 the applicant is requesting clarification on the regulatory basis for developing a Baghouse System Procedures and weekly see-no-see visible emissions inspections requirements.

**Response 3: DEQ issues this language in permits for all facilities using baghouse control for particulate matter to ensure proper operation and protection of ambient air quality as a reasonable permit condition. In this case, the weekly requirement is warranted due to the toxic nature of the emissions.**

Comment 4: For Permit Condition 2.8 the facility proposes the option for an alternate visibility limit from 40 CFR 60.674(c). The applicant also requests additional clarity/alternate language on the visible monitoring period (calendar quarter vs. operational quarter) similar to provisions of 40 CFR 60.675(i), to account for the seasonal nature of the facility.

**Response 4: The intent of the permit condition to monitor visible emissions in accordance with 40 CFR 60, Subpart OOO is retained with the proposed changes. The suggested language was added to the Permit Condition. "Operational quarter" was defined as a calendar quarter occurring during seasonal operation.**

Comment 5: The applicant proposed additional recordkeeping requirement from 40 CFR 60.676(b)(1) in Permit Condition 2.10 for seasonal operation.

**Response 5:** The proposed recordkeeping was added to Permit Condition 2.10 to accommodate seasonal operation in accordance with 40 CFR 60.675 (i).

Comment 6: The applicant proposed adding language to the permit for fugitive dust control from the applicable sections of IDAPA 58.01.01.650-651 and 790-799 for operator convenience.

**Response 6:** The proposed language of IDAPA 58.01.01.650-651 was added to Permit Condition 2.12 and Permit Condition 2.13 was added to include IDAPA 58.01.01.790-799.

# Appendix

## Public Comments Submitted for

### PERMIT TO CONSTRUCT P-2016.0025

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**Molly Prickett**  
**P4 Production, LLC**  
August 25, 2016

P4 Production, LLC (P4) is hereby submitting comments on the Draft Permit to Construct (P-2016.0025) for the P4 Quartzite Quarry, that was released for public comment on July 28, 2016. All suggested changes and corrections are presented in a redline-strikeout (condition 2.4, *sic*) version of the permit provided as Attachment A to this letter (electronic copy is provided via email). Besides some minor typographical corrections, the following is a summary of the suggested changes:

- Conditions 2.5 and 2.7: The primary crusher throughput monitoring requirement language is simplified to allow the operator with the flexibility to utilize other than 68-ton capacity trucks without seeking a permit modification. This flexibility is required to account for equipment breakdowns or upgrades, or utilizing third-party or subcontractor trucks.
- Condition 2.6: The applicant is requesting clarification on the regulatory basis for developing a Baghouse System Procedures and weekly see-no-see visible emissions inspections requirements.
- Condition 2.8: The option for an alternate visibility limit from 40 CFR 60.674(c) is added. The applicant also requests additional clarity/alternate language on the visible monitoring period (calendar quarter vs. operational quarter) similar to provisions of 40 CFR 60.675(i), to account for the seasonal nature of the facility.
- Condition 2.9: The seasonal source flexibility provision for initial performance testing from 40 CFR 60.675(i) is added.
- Condition 2.10: The recordkeeping requirement from 40 CFR 60.676(b)(1) is added.
- Condition 2.12: The applicable sections of IDAPA 58.01.01.650-651 and 790-799 are added.

**Date:** Monday, August 15, 2016 3:59:22 PM

Tom Frankos

Great employer and number one in mining with respect to nature. Monsanto's mines are clean and well groomed for future uses.

**Date:** Thursday, August 04, 2016 12:06:37 PM

Donna Welch

Please allow this permit to be issued. This Quarry has always operated without violations of the air quality criteria.

**Date:** Thursday, July 28, 2016 3:01:47 PM

Kendra Vance

Please approve the permit, the mine is so important to our community and schools.

**Date:** Thursday, July 28, 2016 2:51:34 PM

Rebecca Neese

I am writing in support of approving the permit request. The mines here are the backbone of our community and employ so many here. It is important to all of us in the area to keep the mines up and running.