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Paula Wilson
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706

RE: DEQ Negotiated Rulemaking – Ore Processing by Cyanidation, Docket No. 58-0113-1901

Dear Ms. Wilson:

Brown and Caldwell appreciates the Idaho Department of Environmental Quality (IDEQ) effort to include the public in the IDEQ Rulemaking for Ore Processing by Cyanidation. Following discussion with IDEQ staff participating in the rulemaking meetings, Brown and Caldwell has concerns regarding the clarity and implementation of **IDAPA 58.01.13 Sections 100.3.r Contents of Application, 200.04 Minimum Plans and Specifications for All Facilities Designed to Contain Process Water and 200.05 Process Buildings, Process Chemical Storage Containment Areas and General Facility Criteria.**

Brown and Caldwell asks that IDEQ review the current language requiring final, Professional Engineer stamped engineering plans and specifications for all cyanidation facilities, including process water treatment facilities, as it relates to facilities that will not be implemented until permanent closure of the cyanidation facilities. At the time of a cyanide permit application submittal, facilities not to be implemented or constructed for several years or until closure will not be fully designed and it would be premature to require stamped engineering plans and specifications for such facilities. Therefore, we request that IDEQ provide specific language allowing engineering plans and specifications of these types of facilities be provided to IDEQ following permit issuance.

We look forward to the continued open discussion with IDEQ during the upcoming rulemaking sessions.

Sincerely,

A handwritten signature in blue ink that reads "Todd S. Glindeman".

Todd Glindeman
Mining and Waste Market Sector Director