



Alaska Department of Environmental Conservation
Air Permits Program
555 Cordova Street
Anchorage, AK 99501

Via email: kathie.mulkey@alaska.gov

RE: Comments on Columbia River Carbonate's Calder Mine Draft Minor Source Specific Permit AQ0483MSS04

September 9, 2022

Dear Ms. Mulkey,

Thank you for the prompt response to our request to revise Minor Source Specific (MSS) permit for Columbia River Carbonates' (CRC) Calder Mine (AQ0483MSS04). HMH Consulting, LLC (HMH), together with CRC, has carefully reviewed the draft permit and Technical Analysis Report (TAR). The following comments were developed by HMH and CRC for your consideration.

Comment 1: Clarification of Condition 6.1, Monitoring for Rock Crushers

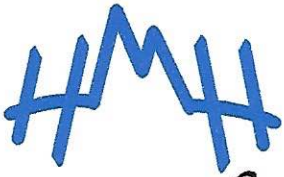
We appreciate the assistance of Alaska Department of Environmental Conservation (ADEC, the Department) in revising Condition 6 to reduce the burden of visible emission observations for aggregate handling operations (i.e: crushers, conveyors), while ensuring compliance with the air quality standard for fugitive particulate matter.

We would like to get some clarification from the Department in advance of the finalization of this permit that we are correctly reading and understanding the following statement: "Determine which point has the highest continuous opacity and use this point for monitoring fugitive emissions from EUs 9 and 10."

We read and understand this to mean that our technicians are to select the *single* highest visible emission (VE) point for the crusher/conveyor circuit that consists of EUs 9 and 10. In other words, technicians are to select only one point that represents the highest VE produced by both of these pieces of equipment. Stated differently, we want to ensure that the Department does not intend CRC to do a single VE observation on EU 9 and another VE observation on EU 10. Clarification in your "Response to Comments" document will be adequate guidance for our purposes.

Comment 2: Revision to Condition 10.3, Nitrogen Oxide (NOx) Limit

The Department has included an alternative to using an installed engine hour meter to monitor engine operations and ensure compliance with the limit in this condition, which is to assume continual operation of the engine in the event of an engine hour meter failure. This alternative



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makes sense in context of a facility in which most of its engines run for extended periods of time, such as with an electric power plant. But the equipment that is grouped under the ORL is operated intermittently and for relatively few cumulative hours in any rolling 12-month period. While we recognize ADEC's interest in having enforceable alternatives to record keeping methods in the event of the failure of an installed meter, we also think it's possible to build in a practical alternative that can be used as an interim measure in the unlikely event that an engine hour meter fails. We suggest the following revision to Condition 10.1 through 10.3 (additions shown in underline, deletions shown in ~~strike-out~~):

- 10.1 Install, maintain, and operate:
- a. a non-resettable hour meter on each of EUs 5a, 28, 29, and 30, or
 - b. in the event that the non-resettable hour meter fails, retain start- and stop-time logs documenting the date and hours of operation of each engine, or
 - c. in the absence of start- and stop-time logs and the hour meter has failed, assume continuous operation for that period;
- 10.2 Record the ~~hour meter reading~~ monthly hours of operation as documented under Condition 10.1 for each of EUs 5a, 28, 29, and 30 on the last day of each month;
- 10.3 By the 15th day of each month, record:
- d. the number of hours that each of EUs 5a, 28, 29, and 30 operated during the previous month, ~~if the meter is not operational assume continuous operation for that period;~~ and
 - e. the monthly NOx emission for the previous month for each of EUs 5a, 28, 29...

Comment 3: Minor correction to TAR

We observed only one spelling error in the TAR. On page 5, under Section 8, the Department refers to "bases" rather than "basis." We believe the Department meant to use the word "basis."

Thank you again for the opportunity to review and comment upon this document.

Sincerely,

A handwritten signature in black ink that reads "Donna Celia".

Donna Celia
HMH Consulting, LLC