

Data Submitted (UTC 11): 7/7/2025 10:56:41 PM

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Comments: PM10 Emissions in Nonattainment Areas:

* The East Plant Site and Alternate 6 (Skunk Camp) tailings storage facility are located in the Hayden PM10 Nonattainment Area, while the Filter Plant/Loadout Facility is within the West Pinal PM10 Nonattainment Area. Total PM10 emissions exceed the 100 tpy threshold for General Conformity per 40 CFR §93.153(b)(1).

* 79 tpy (East Plant) and

* 238 tpy (Skunk Camp)

A conformity analysis (Page 360 paragraph 4) is warranted and should be finalized prior to construction activities.

Recommend that all relevant construction and operational activities comply with Pinal County Air Quality Control District (PCAQCD) Code of Regulations Chapter 4, Article 1 and that NSR permitting is pursued where applicable.

Air Dispersion Modeling and Silt Content Sensitivity:

The inclusion of both AERMOD and CALPUFF modeling to assess near-field and far-field impacts, respectively is helpful. Recommend that final permit applications include the most conservative, site-verified silt content assumptions; and mitigation measures (e.g., road watering, chemical stabilization) as enforceable permit conditions consistent with PCAQCD Rule 4-1-040 (Fugitive Dust).

The FEIS designates the project as a "minor source" under Arizona Department of Environmental Quality (ADEQ) and PCAQCD thresholds. However, total emissions across multiple sites (CO: 615.9 tpy, NOX: 118.4 tpy, PM10: 328.9 tpy and VOCs: 102.7 tpy) suggest major cumulative impact potential (See table 3.6.2-1, Page 353 of the FEIS report).

Request clarification on how minor/major source status was determined and whether operations across multiple facilities are considered a single source per 40 CFR §70.2 (Title V) and PCAQCD definitions. Furthermore, it would be helpful if the report clarifies any jurisdictional boundaries or dual permitting responsibilities (e.g., for Skunk Camp) between PCAQCD and ADEQ.

Monitoring and Reporting Commitments:

Baseline monitoring data from 2012-2017 support the modeling, but ongoing compliance assurance is not detailed. Recommend a post-construction ambient monitoring commitments to ensure actual impacts align with modeled predictions. Quarterly or annual monitoring results submittals to ADEQ/PCAQCD (for public view) and the establishment of compliance thresholds and triggers for mitigation under the permit.