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From: Hardesty, Doug
To: Margaret Donegan-Ryan
Cc: Meyer, Dan; JK MERRILL & SONS; Johansen, Amy
Subject: RE: JK Merrill & Sons - Synthetic Minor Permit Application - Request for Information
Date: Tuesday, September 22, 2020 3:38:43 PM

Margaret,

We've reviewed the information you submitted. Thanks again for the effort and timely submittal.

We don't see (related to requested item #3 below) the labeled description/list of conveyance systems or a new (or edited) process flow diagram that shows each piece of equipment (particularly the conveyance devices) and the specific location of the dust control sprays. The process flow diagram can be handwritten as long as it contains the details. For instance, making handwritten edits to the process flow diagrams included in the original application would be acceptable.

If there is no dry material handling in the wash process, we do not need additional details in that process flow diagram. If there is dry material handling in that process, please add the same details to that process flow diagram as well.

If you think the information was submitted, please specifically point it out to us. This information will allow us to match up the size of material to the number of material transfers and know where/how the water sprays or wet processing reduces the emissions. It also allows us to identify the equipment and controls more specifically in the permit.

Though we would prefer to have these final details before calling your application complete, if you cannot get this additional information to us by Friday, 9/25, please respond to this email agreeing to send us the requested information by a specified date within the next few weeks. If we have that agreement, we should be able to call the application complete (enough) this week and continue with our review.

If you have any questions, please fee free to contact me.

Doug Hardesty
208.378.5759
Air Permit Program Lead
Air Permits & Toxics Branch, Air & Radiation Division, Region 10, U.S. EPA
950 W Bannock St, Suite 900, Boise, Idaho 83702

From: Hardesty, Doug
Sent: Monday, September 21, 2020 1:15 PM
To: Margaret Donegan-Ryan <mdoneganryan@ramboll.com>
Cc: Meyer, Dan <Meyer.Dan@epa.gov>; JK MERRILL & SONS <wecrushrock@gmail.com>
Subject: RE: JK Merrill & Sons - Synthetic Minor Permit Application - Request for Information

Margaret,

Thank you for getting this to us so quickly. We will review it and let you know if we have any questions or need any additional information.

Please do include the responsible official certification with the hard copy.

Doug Hardesty
208.378.5759
Air Permit Program Lead
Air Permits & Toxics Branch, Air & Radiation Division, Region 10, U.S. EPA
950 W Bannock St, Suite 900, Boise, Idaho 83702

From: Margaret Donegan-Ryan <mdoneganryan@ramboll.com>
Sent: Monday, September 21, 2020 12:12 PM
To: Hardesty, Doug <Hardesty.Doug@epa.gov>
Cc: Meyer, Dan <Meyer.Dan@epa.gov>; JK MERRILL & SONS <wecrushrock@gmail.com>
Subject: RE: JK Merrill & Sons - Synthetic Minor Permit Application - Request for Information

Apologies, I forgot to copy Jamie on the previous submittal.

Thanks,
Margaret

Margaret Donegan-Ryan
Managing Consultant

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mdoneganryan@ramboll.com

From: Margaret Donegan-Ryan
Sent: Monday, September 21, 2020 11:09 AM
To: 'Hardesty, Doug' <Hardesty.Doug@epa.gov>
Cc: Meyer, Dan <Meyer.Dan@epa.gov>
Subject: RE: JK Merrill & Sons - Synthetic Minor Permit Application - Request for Information

Hi Doug,

Apologies for not getting this to you on Friday. On behalf of JK Merrill, please find attached our response to your request for additional information. Please let me know if you have questions or need it modified in some way. We will be submitting a hardcopy as well. Do you need a responsible official to certify the information in the submittal?

Thank you,
Margaret

Margaret Donegan-Ryan
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mdoneganryan@ramboll.com

From: Hardesty, Doug <Hardesty.Doug@epa.gov>
Sent: Monday, September 14, 2020 2:48 PM
To: Margaret Donegan-Ryan <mdoneganryan@ramboll.com>
Cc: Meyer, Dan <Meyer.Dan@epa.gov>
Subject: RE: JK Merrill & Sons - Synthetic Minor Permit Application - Request for Information

Margaret,

I we receive the information by the end of this week, the 18th, we can make that work. Please read the request carefully and contact me if you have any questions. Kyle owes you one!

I hope you are well.

Doug Hardesty
208.378.5759
Air Permit Program Lead
Air Permits & Toxics Branch, Air & Radiation Division, Region 10, U.S. EPA
950 W Bannock St, Suite 900, Boise, Idaho 83702

From: Margaret Donegan-Ryan <mdoneganryan@ramboll.com>
Sent: Monday, September 14, 2020 2:15 PM
To: Hardesty, Doug <Hardesty.Doug@epa.gov>
Cc: Meyer, Dan <Meyer.Dan@epa.gov>
Subject: RE: JK Merrill & Sons - Synthetic Minor Permit Application - Request for Information

Hi Doug,

I hope you're staying healthy with all the fires around at the moment. As you know, Jamie and Kyle have had vacations and I am helping prepare the response to comments for JK Merrill. With their absences, we're working to get all the information as soon as possible. Jamie forwarded the attached email about submitting the information after the due date in your request. She told me the due date was no longer September 15th. I just wanted to confirm that that is accurate. We're working to have everything together and sent to you this week, but tomorrow is going to be difficult.

Thanks,
Margaret

Margaret Donegan-Ryan
Managing Consultant

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From: Hardesty, Doug <Hardesty.Doug@epa.gov>
Sent: Wednesday, September 2, 2020 2:06 PM
To: Margaret Donegan-Ryan <mdoneganryan@ramboll.com>
Cc: Meyer, Dan <Meyer.Dan@epa.gov>
Subject: FW: JK Merrill & Sons - Synthetic Minor Permit Application - Request for Information

Margaret,

Below is the email I sent to Kyle and JK Merrill today.

If you have any questions, please let me know. I will be out next week. Dan Meyer, copied here, is available for questions in my absence.

Doug Hardesty
208.378.5759
Air Permit Program Lead
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950 W Bannock St, Suite 900, Boise, Idaho 83702

From: Hardesty, Doug <Hardesty.Doug@epa.gov>
Sent: Wednesday, September 02, 2020 12:44 PM
To: Kyle Heitkamp <kheitkamp@ramboll.com>
Cc: JK MERRILL & SONS <wecrushrock@gmail.com>; Johansen, Amy <Johansen.Amy@epa.gov>; Meyer, Dan <Meyer.Dan@epa.gov>
Subject: JK Merrill & Sons - Synthetic Minor Permit Application - Request for Information

Kyle,

On July 22, 2020, EPA Region 10 received JK Merrill & Sons' electronic application for a synthetic minor permit to avoid the Title V operating permit program for your rock crushing facility at Merrill Pit near Pocatello, Idaho, on the Fort Hall Indian Reservation. We understand that the application was submitted to satisfy the terms of the Administrative Compliance Order on Consent No. CAA-10-2020-0081, which requires you to compile and submit a complete application for a permit for your rock crushing facility that limits its potential to emit nitrogen oxides to below major source levels (less than 100 tons per year). We have completed our initial review of your application.

To issue JK Merrill a synthetic minor permit that allows it to avoid the Title V program, EPA Region 10 must confirm whether limits other than those proposed for NOx are also necessary. To allow us to continue processing your application, please respond to the following request. If we receive the requested information by September 15, 2020, we should be able to determine your application complete before our 60-day deadline. By issuing you a synthetic minor permit that allows you to avoid the Title V permitting program , you will also have the limits needed to satisfy the Compliance Order.

Information requested:

1. In the second paragraph of Section 3 on page 8 of the application, there is a statement to the effect that all emissions other than those from the generator engines are fugitive particulate matter emissions from crushing, screening, material transfer, storage piles, and roadways that are not included in facility-wide emissions compared to the Title V major source thresholds because the facility operations are not a listed category of stationary source. While it is true

that fugitive emissions are not counted towards Title V applicability, EPA does not consider particulate matter emissions from crushing, screening or most material transfers to be fugitive emissions. Particulate matter emissions caused by road traffic, large piles and material transfers from trucks or front-end loaders are activities at your facility that can be considered fugitive emissions. Revise the application text to reflect this fact.

2. In the potential to emit tables of the application, present all of the non-fugitive particulate matter emissions.
3. List, describe and label with emission unit identification numbers or codes all of the crushers, screens and conveyance systems for ease of reference in the permit. Include all of the equipment in the process flow diagrams included with the application. Denote where water sprays for dust control are used and where water is otherwise added to the process for wet processing, also noting whether the water sprays are required.
4. On the facility site plan in Figure 2 of the application, clarify whether both generators are located in the same location or add the second generator to the site plan.
5. For the generators, provide copies of all past emission test results (full reports if available). If none are available, provide any emission information from the manufacturer that is available.
6. Include a complete emission inventory of hazardous air pollutants.
7. For sulfur dioxide potential emissions from the generators, use the most stringent applicable fuel sulfur content limits (e.g. in the Federal Rules for Reservations or other applicable requirements). If the resulting potential to emit sulfur dioxide is greater than 100 tons per year, JK Merrill can propose using the Ultra-Low Sulfur Diesel that is in the inventory submitted.
8. For all pollutants (in addition to NOx) with the potential to be emitted above the major source thresholds for Title V, propose synthetic minor limits and associated testing, monitoring , recordkeeping and reporting.
9. Provide the manufacturer and model of the non-resettable fuel meters and the date the meters will be (or were) installed on the generators. Also, provide the related quality assurance and quality control procedures for the non-resettable fuel meters.
10. On what date was the originally-signed written application mailed to EPA Region 10?

If you have any questions, please feel free to contact me. I will be out of the office September 7 through 11, returning to work on September 14, 2020. If you have any questions in my absence, please contact Dan Meyer at 206.553.4150 and meyer.dan@epa.gov.

Also, note that Kelly McFadden is on a detail for a few months – Amy Johansen (copied on this email) is the acting Branch Chief until Kelly returns.

Doug Hardesty
208.378.5759
Air Permit Program Lead
Air Permits & Toxics Branch, Air & Radiation Division, Region 10, U.S. EPA
950 W Bannock St, Suite 900, Boise, Idaho 83702

From: Kyle Heitkamp <kheitkamp@ramboll.com>
Sent: Wednesday, July 22, 2020 4:57 PM

To: McFadden, Kelly <McFadden.Kelly@epa.gov>; Hardesty, Doug <Hardesty.Doug@epa.gov>
Cc: JK MERRILL & SONS <wecrushrock@gmail.com>
Subject: JK Merrill & Sons - Synthetic Minor Permit Application

Kelly & Doug,

Attached is a synthetic minor permit application requesting a facility-wide limit on NOx emissions from JK Merrill & Sons rock crushing facility located on the Fort Hall Indian Reservation. The submittal of this application to EPA satisfies one of the requirements in Administrative Compliance Order on Consent No. CAA-10-2020-0081.

Please let us know if you have any questions regarding this permit application.

Kyle

Kyle Heitkamp

Senior Managing Consultant

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