

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

Ken McQueen
Cabinet Secretary

Matthias Sayer
Deputy Cabinet Secretary

Fernando Martinez, Director
Mining and Minerals Division



January 18, 2018

Mr. David Davidson
Gulf Coast Mining Group, LLC
4000 Legato Rd., Suite 1100
Fairfax, VA, NM 22033

RE: Comments on Permit Modification 17-1, Permit No. OT006MN, Iron Duke Mine

Dear Mr. Davidson,

The New Mexico Mining and Minerals Division ("MMD") received an application to modify the Iron Duke Mine mining permit (No. OT006MN) delivered as a "draft" via email on December 6, 2017. The Iron Duke Mine is located on patented lode mining claims (Iron Duke, Cinco de Mayo, Virginia, and Barbara) within the Orogrande Mining District, located northwest of Orogrande, in Sections 3 and 4, Township 22 South, Range 8 East, N.M.P.M., in Otero County. The application, titled "Amendment to the Gulf Coast Minimal Impact Mining Permit" and dated December 5, 2017, was submitted by R.T. Hicks Consultants, LTD and requested authorization to add a ball mill for processing ore to the mine permit area. The application also proposed to increase the area of disturbance from 7.88 acres to 9.18 acres.

Pursuant to §19.10.3.304.H and §19.10.6.608.D(3) New Mexico Mining Act Rules, MMD requested the review of the Revised Reclamation Plan by the U.S. Bureau of Land Management ("BLM"), the Mexico Department of Game and Fish ("NMDG&F"), the New Mexico Environment Department ("NMED"), the New Mexico Office of the State Engineer ("NMOSE"), the New Mexico State Forestry Division ("NMFD"), and the New Mexico Department of Cultural Affairs ("NMDCA"). In accordance with §19.10.3.304.H NMAC, these agencies had 20 days from the date of receipt of the letter in which to provide comments.

MMD received written comments from NMED, NMFD and NMDG&F. Copies of the comments from these agencies are attached. Please review these responses and note the guidance listed in them. We also received verbal comments from NMDCA stating that they had no concerns about cultural resources as long as the BLM did not bring up any concerns. MMD did not receive any comments from the BLM.

MMD has the following concerns about the existing permit and the proposed permit modification:

Permit Boundary

The approved permit states that the permit area consists of four patented load mining claims: Iron Duke, Cinco de Mayo, Virginia and Barbara (Section 3 and Section 4, subsection CC). It appears that current and planned disturbances cross the border of these patented mining claims onto BLM land. Please modify the permit to include any affected areas outside of the patented mining claims in the permit boundary and demonstrate that the BLM has granted authorization for previous and future disturbance related to the mining activity to take place on BLM land.

Access Road

Section 10, subsection CC of the approved permit states:

“This Permit is conditioned on the requirement that, when the dispute between BLM and Otero County over ownership of the access road has been resolved, Applicant will apply for a revision of this Permit in order to include in the Permit Area all areas that Applicant has disturbed in connection with the use and/or improvement of the access road.”

MMD has no record of a resolution to this issue. Please clarify how this situation was resolved.

Current Area of Disturbance

According to Section 10, subsection BB of the approved permit, the mining operation will not exceed 6.9 acres of disturbed land. The modification application says the current allowable disturbed acreage is 7.88 acres. Please explain this discrepancy.

Vegetation Reference Area

The approved permit required that a vegetation reference area be identified and proposed by the Permittee to MMD with 180 days of the approval date of the permit (Section 10, subsection O). MMD has no record of receiving such a proposal. Please identify and propose a vegetation reference area for the permit.

Cost Estimate for Reclamation

The Mining Act Reclamation Program Rules require that an applicant for an exploration or mining permit provide “*an estimate of the proposed financial assurance required by 19.10.12 NMAC*”. In your application, it is unclear if your proposal of \$5,000 is intended to replace the existing financial assurance of \$15,597 or to be added to this amount. The \$5,000 amount appears to be intended for any disturbed areas on BLM land but not for the private patented land. In fact, you state that “On the patented mining claims, which are private property, ‘reclamation’ should not be required.”

It is MMD’s position that all land disturbed under this permit shall be reclaimed and a reclamation plan be provided. The New Mexico Mining Act does not differentiate between public and private land when it comes to permitting authority and reclamation requirements.

The original cost estimate for this permit was developed in 2011. The New Mexico Mining Act Rules require the cost estimate to be reviewed and updated when a permit is modified (§19.10.12.1206.D). The cost estimate to be used for the financial assurance of this permit can be determined using the Mining Act Reclamation Program's "GUIDANCE FOR ESTIMATING RECLAMATION COSTS for PART 3 - MINIMAL IMPACT EXPLORATION AND MINIMAL IMPACT MINING and PART 4 - REGULAR EXPLORATION PERMIT APPLICATIONS" found on our website. Using this methodology, the cost estimate would be calculated as follows:

Cost of reclaiming 9.18 acres of disturbance:

- \$8,900 (first acre) + (8.18 (additional acres) x \$4,900) = \$48,982.00
- Total FA required with escalation over 5 years; $\$48,982 \times (1 + 2.2\%)^5 = \$54,612.37$

(*Escalation rates for mining operations, only, shall be applied to the financial assurance calculation for a minimum of five years. This is to cover the cost of future reclamation. The escalation rate is based on the Consumer Price Index (CPI), averaged over the last 20 years. In 2017, the 20-year average for the CPI is 2.2%.)

You are welcome to propose your own cost estimate to reclaim the mine site. Please keep in mind that it must be comprehensive and include all aspects of the reclamation process. Important things to consider when developing a cost estimate for reclamation include:

- Mobilization/Demobilization
- Ripping
- Grading (including the recontouring of newly built roads and restoring drainages)
- Supervisors
- Equipment and Material Removal
- Seeding/Mulching
- Other Indirect Costs (see our guidance document for calculating Indirect Costs found on our website - emnrd.state.nm.us/MMD/MARP/MARPGuidanceGuidelines.html)

Please contact me at (505) 476-3437 or Mike Tompson of my staff at (505) 476-3427 if you have any questions.

Sincerely,



Holland Shepherd, Manager
Mining Act Reclamation Program ("MARPP")

cc: David Hamilton, *R.T. Hicks Consultants, Ltd.*

GOVERNOR
Susana Martinez



DIRECTOR AND SECRETARY
TO THE COMMISSION
Alexandra Sandoval

DEPUTY DIRECTOR
Donald L. Jaramillo

STATE OF NEW MEXICO DEPARTMENT OF GAME & FISH

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Roswell

THOMAS "DICK" SALOPEK
Las Cruces

27 December 2017

Michael Tompson, Permit Lead
Mining Act Reclamation Program (MARP)
New Mexico Mining and Minerals Division
1220 South St. Francis Drive
Santa Fe, NM, 87505

RE: Modification 17-1 Application, Add Ball Mill to Process Ore, Iron Duke Mine, Otero County, New Mexico, Permit No. OT006MN. NMDGF No. 18197.

Dear Mr. Tompson:

In response to your letter dated 12 December 2017 regarding the above referenced project, the Department of Game and Fish (Department) does not anticipate significant impacts to wildlife or sensitive habitats, with implementation of the applicable mitigation or avoidance measures included within the project description. For your information, we have enclosed a list of sensitive, threatened and endangered species that occur in Otero County. Included below are sources of additional information:

1. For Biota Information System of New Mexico (BISON-M) species accounts, searches, and county lists go to bison-m.org.
2. For the Department's Habitat Handbook Project guidelines go to <http://www.wildlife.state.nm.us/conservation/habitat-information/habitat-handbook/>.
3. For custom, site-specific database searches on plants and wildlife go to nhnm.unm.edu, then go to Data, Free On-Line Data, and follow the directions.
4. For state-listed plants contact the New Mexico State Forestry Division at (505) 476-3334 or nmrareplants.unm.edu/index.html.
5. For the most current listing of federally listed species **always** check the U.S. Fish and Wildlife Service's Information, Planning, and Conservation website at <http://ecos.fws.gov/ipac/>.

Thank you for the opportunity to review and comment on your project. If you have any questions, please contact Ron Kellermueller, Mining and Energy Habitat Specialist at ronald.kellermueller@state.nm.us or (505) 476-8159.

Sincerely,

Chuck L. Hayes, Assistant Chief
Ecological and Environmental Planning Division
cc: USFWS NMES Field Office

State of New Mexico
Energy, Minerals and Natural Resources Department

107038

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Cabinet Secretary

Matthias Sayer
Deputy Cabinet Secretary



Fernando Martinez, Director
Mining and Minerals Division



RECEIVED

December 12, 2017

BOY
DEC 14 2017
HISTORIC PRESERVATION DIVISION

Bob Estes, Ph.D., Archaeologist
Historic Preservation Division
New Mexico Department of Cultural Affairs
407 Galisteo St., Suite 236
Santa Fe, NM 87501

Re: Request for Comments on Modification 17-1 Application, Add a Ball Mill to Process Ore and to Increase Area of Disturbance, Iron Duke Mine, Otero County, New Mexico, Permit No. OT006MN

Dear Dr. Estes,

On December 6, 2017, the Mining and Minerals Division ("MMD") of the New Mexico Energy, Minerals, and Natural Resources Department received a permit application from Gulf Coast Mining Group, LLC to modify permit number OT006MN. The application requests the approval to use a ball mill for processing ore at the Iron Duke Mine and to increase the acreage of disturbance from 7.88 acres to 9.18 acres. The Iron Duke Mine is located on patented lode mining claims (Iron Duke, Cinco de Mayo, Virginia, and Barbara) within the Orogrande Mining District, located northwest of Orogrande, in Sections 3 and 4, Township 22 South, Range 8 East, N.M.P.M., in Otero County. The application is being processed as modification number 17-1 to permit OT006MN.

Pursuant to §19.10.3.304.H and §19.10.6.608.D(3) NMAC, MMD is requesting comments from your agency regarding the application to modify the permit. The application received from the operator can be downloaded from MMD's website at http://www.emnrd.state.nm.us/MMD/MARP/OT006MN_Mod17-1.html.

In accordance with §19.10.3.304.H NMAC, your agency has 20 days from the date of receipt of this letter in which to provide comments. The Director will consider these comments in making the decision whether to approve this permit modification.

If you have any questions, please contact me at (505) 476-3427 or by email at mike.tompson@state.nm.us.

Sincerely,

A handwritten signature in blue ink that reads "Michael W. Tompson".

Michael W. Tompson, Permit Lead
Mining Act Reclamation Program (MARP)

cc: Mine File (OT006MN)

1220 South St. Francis Drive • Santa Fe, New Mexico 87505
Phone (505) 476-3200 • Fax (505) 476-3220 • www.emnrd.state.nm.us

NO COMMENT

A handwritten signature in blue ink that reads "John R. Estes".

Jan 8, 2018

Previous consultations
from BLM



**NEW MEXICO
ENVIRONMENT DEPARTMENT**



SUSANA MARTINEZ
Governor

Ground Water Quality Bureau
1190 South St. Francis Drive (87505)
P.O. Box 5469, Santa Fe, New Mexico 87502-5469
Phone (505) 827-2900 Fax (505) 827-2965

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Deputy Secretary

MEMORANDUM

DATE: December 28, 2017

TO: Holland Shepherd, Program Manager, Mining Act Reclamation Program

FROM: Keith Ehlert, Operational Team Leader, Mining Environmental Compliance Section
George Llewellyn, Mining Environmental Compliance Section
John Money, Surface Water Quality Bureau
Neal Butt, Air Quality Bureau

THROUGH: Jeff Lewellin, Mining Act Team Leader, Mining Environmental Compliance Section

RE: **NMED Comments for the Iron Duke Mine, Otero County, MMD Permit No. OT006MN, Modification 17-1**

The New Mexico Environment Department (NMED) received correspondence from the Mining and Minerals Division (MMD) on December 12, 2017 requesting that NMED review and provide comments on the above referenced MMD permitting action. In accordance with § 19.10.3.304.H and § 19.10.6.608.D.(3) NMAC NMED has 20 days to provide comment. NMED comments are set forth below.

Background

The Permittee for the Iron Duke Mine is the Gulf Coast Mining Group, LLC (Permittee). In Modification 17-1, the Permittee of the Iron Duke Mine requests to increase the area of disturbance at this minimal impact new mine from 7.88 acres to 9.18 acres. In addition, the Permittee requests to construct a ball mill for processing ore at the Iron Duke Mine that uses water in a closed loop system. The mine and proposed ball mill are located in the Orogrande Mining District northwest of Orogrande, Otero County, T22S, R8E, Sections 3 and 4.

Air Quality Bureau

The Air Quality Bureau comments are attached under separate letterhead.

Surface Water Quality Bureau

The Surface Water Quality Bureau (SWQB) comments are attached under separate letterhead.

Mining Environmental Compliance Section Comments

The Mining Environmental Compliance Section (MECS) finds that the proposed increased area of disturbance and ball mill are likely to have minimal environmental impact if the ball mill is operated as described in the submittal included with the amendment request titled *Amended Attachment to the Minimal Impact New Mining Operation Iron Duke, Cinco de Mayo, Virginia, and Barbara Patented Claims, Otero County, New Mexico* dated December 5, 2017. If the Permittee decides to initiate operations at the Iron Duke Mine that involve mining of undisturbed material from the surface or subsurface, or makes changes to the ore milling process they must first submit a Notice of Intent to Discharge with the New Mexico Ground Water Quality Bureau, subject to Section 20.6.2.1201 NMAC.

NMED Summary Comment

NMED finds the proposed activities are likely to have a minimal environmental impact if conducted and reclaimed in accordance with the approved permit and recommendations listed above.

If you have any questions regarding the above comments, please contact Jeff Lewellin at (505) 827-1049.

cc: Bruce Yurdin, Division Director, NMED-WPD
Shelly Lemon, Bureau Chief, SWQB
Richard Goodyear, Bureau Chief, AQB
Fernando Martinez, Division Director, EMNRD-MMD
Mike Tompson, Iron Duke Mine, Lead Staff, EMNRD-MMD
Kurt Vollbrecht, Program Manager, MECS



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J. C. BORREGO
Deputy Secretary

MEMORANDUM

TO: Jeff Lewellin, Mining Act Team Leader
Mining Environmental Compliance Section
Ground Water Quality Bureau (GWQB)

FROM: John Moeny, Surface Water Quality Bureau

SUBJECT: **Request for Comments on Modification 17-1 Application, Add a Ball Mill to Process Ore and to Increase Area of Disturbance, Iron Duke Mine, Otero County, New Mexico, Permit No. OT006MN**

DATE: December 22, 2017

On December 12, 2017, the NMED received a request for comments regarding the Iron Duke Mine. The New Mexico Mining Act rules require NMED to comment within 20 days of the date of receipt; comments were submitted prior to the January 2, 2018 deadline.

Summary of Proposed Action

Gulf Coast Mining Group LLC. purposes to increase the total acreage of their minimal impact mining operation from 7.88 acres to 9.18 acres. The size increase is necessitated by the additional of a ball mill and rock sorting facility that will allow on-site processing of low-grade iron ore found in historic, unreclaimed, waste rock 'dumps'. These dumps would be moved to a new sorting facility adjacent to the mill where ore-bearing material will be sorted and processed. Unmilled rock would then be used in erosion control and reclamation activities.

Relevant State and Federal Water Quality Regulations

No perennial water bodies are known near the Iron Duke Mine, and surface water drainages report to the Tularosa Basin. Drainages within and surrounding the mine facility are subject to state water quality standards, designated uses, and numeric criteria for intermittent waters (NMAC 20.6.4.98) until they may be shown to be ephemeral using the Hydrology Protocol and a Use Attainability Analysis has been completed and approved (NMAC 20.6.4.15).

- The U.S. Environmental Protection Agency (USEPA) requires National Pollutant Discharge Elimination System (NPDES) Storm Water Multi-sector General Permit

(MSGP) coverage for facilities that engage in “industrial activities” as defined at 40 Code of Federal Regulations Part 122.26(b)(14). Because this project appears to meet this definition (specifically 40 CFR Part 122.26(b)(14)iii, Standard Industrial Classification code 1011 Iron Ores covered under MSGP SECTOR G: METAL MINING) it may require appropriate NPDES permit coverage prior to beginning operations. If you have questions about this coverage please contact Sarah Holcomb, SWQB, at (505) 827-2798

- Construction activities in support of the drilling, mining or hauling in intermittent and ephemeral drainages may require a federal Clean Water Act Section 404 Dredge and Fill Permit and the corresponding Section 401 State of New Mexico Certification of the federal permit. For details contact the US Army Corps of Engineers Las Cruces Regulatory Office at 575.268.8612.
- Report all spills immediately to the NMED as required by the New Mexico Water Quality Control Commission regulations (20.6.2.1203 NMAC). For non-emergencies during normal business hours, call 505-428-2500. For non-emergencies after hours, call 866-428-6535 or 505-428-6535 (voice mail, twenty-four hours a day). For emergencies only, call 505-827-9329 twenty-four hours a day (NM Dept of Public Safety).

In addition to the regulations above, the following best management practices are recommended to protect surface water quality.

- It is recommended that a minimum setback from watercourses of 100 feet be required of staging areas, equipment yards, lay-down areas, stockpiled ore and overburden and other disturbed areas associated with mine activities.
- Fuel, oil, hydraulic fluid, lubricants, and other petrochemicals must not be stored within any watercourse and must have a secondary containment system to prevent spills.
- Appropriate spill clean-up materials such as absorbent pads must be available on-site at all times during construction, site preparations, and mining operations to address potential spills.
- Shape reclaimed slopes to 3:1 or shallower to prevent erosion of placed and native materials.

Impacts to Surface Water Quality

The SWQB finds that Gulf Coast Mining Group’s application to revise their minimal impact mining permit is likely to have minimal environmental impact if operated and reclaimed with the approved permits including stormwater pollution controls and the comments above.

If you have any questions, please phone me at (575) 956-1545.



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MEMORANDUM

DATE: December 22, 2017

TO: Jeff Lewellin, Mining Act Team Leader
Mining Environmental Compliance Section, Ground Water Quality Bureau

FROM: Neal Butt, Environmental Analyst
Control Strategies Section, Air Quality Bureau

RE: Request for Comments, Gulf Coast Mining Group, LLC, Iron Duke Mine,
Minimal Impact New Mining Operation – Modification 17-1 to build a ball mill
to process ore and increase the area of disturbance from 7.88 to 9.18 acres in
Otero County, MMD Permit No. OT006MN

The New Mexico Air Quality Bureau (AQB) has completed its review of the above-mentioned mining project. Pursuant to the New Mexico Mining Act Rules, the AQB provides the following comments:

Air Quality Permitting History

The AQB issued NSR Permit #4517 on 11/2/11 for a rock crusher. The permit requires the applicant to develop a Fugitive Dust Control Plan, including dust control on haul roads. The applicant will need to revise their existing air permit prior to constructing any new equipment (e.g. ball mill).

Details

R.T. Hicks Consultants, Ltd. on behalf of Gulf Coast Mining Group, LLC, has submitted a request to modify (17-1) Minimal Impact Mining Permit OT006MN, to allow the use of a ball mill in processing ore, using water in a closed loop system, at the Iron Duke Mine, and to increase the acreage of disturbance from 7.88 acres to 9.18 acres to accommodate this machinery. The Iron Duke Mine is located on patented lode mining claims (Iron Duke, Cinco de Mayo, Virginia, and Barbara) within the Orogrande Mining District, located northwest of Orogrande, in Sections 3 and 4, Township 22 South, Range 8 East, N.M.P.M., in Otero County.

According to the applicant, no new pits, quarries or stockpiles will be constructed. The quarry rock/limestone will be milled on the pad to allow a better sorting between iron materials and

limestone materials. Both are removed from the site as products. Therefore, the proposed on-site milling will not create any waste dumps, as was the previous case. Some of the rock in the historic waste dumps is “country rock” and is most probably quartz monzonite. This country rock will be left in place or replaced in the area of the historic dump as part of the waste dump reclamation program.

Air Quality Requirements

The *New Mexico Mining Act* of 1993 states that “Nothing in the *New Mexico Mining Act* shall supersede current or future requirements and standards of any other applicable federal or state law.” Thus, the applicant is expected to comply with all requirements of federal and state laws pertaining to air quality. Current requirements which may be applicable in this mining project include, but are not limited to the following:

Subsection A of 20.2.72.200 NMAC, *Application for Construction, Modification, NSPS, And NESHAP - Permits and Revisions*, states that: “Permits must be obtained from the Department by:

(1) “any person constructing a stationary source which has a potential emission rate greater than 10 pounds per hour or 25 tons per year of any regulated air contaminant for which there is a National or New Mexico Ambient Air Quality Standard. If the specified threshold in this subsection is exceeded for any one regulated air contaminant, all regulated air contaminants with National or New Mexico Ambient Air Quality Standards emitted are subject to permit review. . .”; and

(3) “Any person constructing or modifying any source or installing any equipment which is subject to 20.2.77 NMAC, *New Source Performance Standards*, 20.2.78 NMAC, *Emission Standards for Hazardous Air Pollutants*, or any other New Mexico Air Quality Control Regulation which contains emission limitations for any regulated air contaminant;”

Also, Paragraph (1) of Subsection A of 20.2.73.200 NMAC, *Notice of Intent*, states that:

“Any owner or operator intending to construct a new stationary source which has a potential emission rate greater than 10 tons per year of any regulated air contaminant or 1 ton per year of lead shall file a notice of intent with the department.”

In addition, pursuant to Subsection A of 19.10.3.304 NMAC, *Minimal Impact New Mining Operations*:

“A minimal impact new mining operation will not exceed 10 acres of disturbed land, or 40 acres of disturbed land in the case of dolomite, garnet, humate, perlite and zeolite operations that: (1) are located outside Bernalillo, Dona Ana and Santa Fe counties; and (2) are committed to perform concurrent reclamation of disturbed areas to the extent practicable. Pre-existing roads and reclaimed acres within the permit area will not be counted as part of the acreage limitation

for a minimal impact new mining operation. Reclaimed, for this purpose, means all financial assurance has been released, except the amount held to re-establish vegetation pursuant to Subsection A of 19.10.12.1204 NMAC. Construction of roads and access ways, the types of disturbances, and the applicant's previous history of compliance with the act and 19.10 NMAC will be major factors in the director's determination of minimal impact status. In determining whether a proposed operation with between 10 and 40 acres of disturbed land is eligible for a minimal impact new mining permit, the director shall conduct a site visit that may include other agencies in accordance with Subsection I of 19.10.3.304 NMAC. Notwithstanding the frequency for inspections of minimal impact mining operations specified in Paragraph (4) of Subsection A of 19.10.11.1101 NMAC, if a minimal impact operation permit is issued under this subsection for more than 10 acres of disturbance, the director shall conduct on-site inspections at least once per year during the term of the permit.

The above is not intended to be an exhaustive list of all requirements that could apply. The applicant should be aware that this evaluation does not supersede the requirements of any current federal or state air quality requirement.

Fugitive Dust

Fugitive dust is a common problem at mining sites. The AQB does not currently regulate fugitive dust; however, we do recommend controls to minimize emissions of particulate matter from fugitive dust sources. The following control strategies can be included in a comprehensive facility dust control plan (from EPA's Compilation of Air Pollutant Emission Factors, AP-42):

Unpaved haul roads and traffic areas: paving of permanent and semi-permanent roads, application of surfactant, watering, and traffic controls, such as speed limits and traffic volume restrictions.

Paved roads: covering of loads in trucks to eliminate truck spillage, paving of access areas to sites, vacuum sweeping, water flushing, and broom sweeping and flushing.

Material handling: wind speed reduction and wet suppression, including watering and application of surfactants (wet suppression should not confound track out problems).

Bulldozing: wet suppression of materials to "optimum moisture" for compaction.

Scraping: wet suppression of scraper travel routes.

Storage piles: enclosure or covering of piles, application of surfactants.

Miscellaneous fugitive dust sources: watering, application of surfactants or reduction of surface wind speed with windbreaks or source enclosures.

Recommendation

The AQB has no objection to the current request for a permit modification.
The applicant is expected to comply with all requirements of federal and state laws pertaining to air quality. This written evaluation does not supersede the applicability of any forthcoming state or federal regulations.

If you have any questions, please contact me at (505) 476-4317.

Tompson, Mike, EMNRD

From: Roth, Daniela, EMNRD
Sent: Monday, December 18, 2017 9:54 AM
To: Tompson, Mike, EMNRD
Subject: RE: Modification 17-1, Iron Duke Mine (Permit No. OT006MN)

Dear Michael Tompson:

Thank you for giving me the opportunity to review and comment on Modification 17-1 Application, adding a ball mill to process ore and to increase the area of disturbance at the Iron Duke Mine in Otero County, NM (OT006MN). I do not anticipate any impacts to state listed endangered plants from the proposed addition of a ball mill or the expanded area of disturbance.

Please let me know if I can be of further assistance.

Sincerely,

Daniela Roth

Botany Program Coordinator
EMNRD – Forestry Division
1220 S. Saint Francis Drive
Santa Fe, NM 87505
505-476-3347

<http://www.emnrd.state.nm.us/SFD/>