

State of New Mexico
Energy, Minerals and Natural Resources Department

Michele Lujan Grisham
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Sarah Cottrell Propst
Cabinet Secretary

Todd Leahy, JD, PhD
Deputy Cabinet Secretary

Jerry Schoeppner, Director
Mining and Minerals Division



ELECTRONIC TRANSMITTAL

March 12, 2021

Sierra Dierksen, Environmental Permitting Technician
Elko Mining Group LLC
9650 Gateway Drive, Suite 202
Reno, NV 89521

RE: Comments on; *Banner Mine and Mill Site Application for Standby Status with associated Closeout Plan and Financial Assurance (“FA”), Permit Revision 20-1; Permit Number HI001RE*

Dear Ms. Dierksen:

The New Mexico Mining and Minerals Division (“MMD”) received *Banner Mine and Mill Site Renewal Application for Standby Status Permit Revision 20-1; Permit Number HI001RE* for review, dated March 2020 and the associated Closeout Plan with FA, dated August 2020. Due to COVID-19 restrictions we were not able to conduct the site inspection until February 11, 2021. Thank you for your patience with our review of this document. Below are MMD’s and associated Agency comments on this submittal per sections §19.10.5.506 and §19.10.7.701 NMAC.

MMD Comments

1. It is MMD’s understanding that the site stopped any type of activity related to ore processing sometime in 2014. Please provide the date that ore processing ceased on the site. 180 days from that date will be the start date for the Banner Mine and Mill Site to start Standby Status.
2. Provide more detail on what construction has been done at the Banner Mill Site in relation to Revision 14-1. Also provide a timeline describing when unfinished construction related to Revision 14-1 will be done in the future.
3. Provide a detailed figure showing stormwater management demonstrating positive drainage and diversion channel design throughout the permit boundary.

4. Provide a detailed figure showing reclaimed, and un-reclaimed shafts, adits, and tunnels within the Permit Boundary including pre-NM Mining Act features and features covered under the NM Mining Act.
5. Provide a detailed map including PMLU designations with associated acreages of the mine site. This map should demonstrate the 21.1 acres reflected in the Cost Estimate.
6. Provide a list of structures [with associated map] that will remain and also be demolished in the Industrial PMLU area.
7. Remove the discussion of transplanting cactus species from Section 4.4 Revegetation.
8. Section 4.5.1 mentions the use of fertilizer at Closeout. MMD does not support the use of synthetic fertilizers used in agriculture but is in favor of biosolids and other types of topdressing amendments that include organic matter in their composition.
9. Include a column in Table 4-1 with seeds/sq.ft. for each plant species. The drilled seed rate should range from 20-40 seed/sq.ft. total. Broadcast should be double the drilled rate.
10. All reclaimed areas described in Section 4.8 must be covered with a minimum of 24 in. of growth media in addition to the required amount of fill material needed to establish the proper slope gradients for positive drainage at reclamation. Additionally, any impacted areas such as the tailing impoundment must be covered with a minimum of 3 ft. of total cover. Because of this increase in growth media depth the FA estimate will need to be updated.
11. Discuss how foundations of demolished structures will be dealt with at mill closure. These demolition costs will need to be included in the cost estimate.
12. Erosion monitoring inspections will need to be conducted annually for the entire 12-year bond release period after reclamation has occurred.
13. Provide a detailed figure showing the two PMLU designations on a map. MMD recommends changing the “grazing/wildlife habitat” PMLU to “wildlife habitat”.
14. Currently the Dry Stacking Unit holds roughly 10,000 tons of material cleaned out of the Tailing Impoundment. What is the plan for removal of this material? Is removal of this material included in the FA estimate? Please include in the FA estimate if it is not.
15. Include in the Closeout Plan and FA estimate information on how the borrow area quarry below the Tailing Impoundment Dam will be reclaimed at Closeout.
16. Item No. 2 and 4 in the Cost Estimate have yards/hour for equipment that is used to calculate the required hours to complete a task. Please provide the calculations behind these numbers and the equipment productivity.

17. It is unclear if there are disposal costs for all milling equipment and infrastructure including ancillary facilities, head frame, scale and scale house, water tanks, piping, pumps, small equipment, and any other waste that comes from demolition in the cost estimate. If these costs are not already in the cost estimate, please add them. Section 19.10.12.1205 NMAC states that “credit for salvage of building materials or abandoned equipment or supplies shall not be allowed”.
18. Another key assumption states "the estimate provides for transport costs only for equipment/materials transported for salvage or recycle". Please include disposal costs for all equipment since Section 19.10.12.1205 of the Mining Act Rules applies to equipment as well.
19. Please breakdown Reclamation and Revegetation costs [Item No. 5 of Cost Estimate] into the following categories: Surface reshaping/growth media placement, placement of soil amendment, and seeding/mulching costs.
20. Section 4.8.4 states that “a drainage ditch will be constructed”. Please include this cost in the estimate.
21. Section 6.2 states that a berm or fence will be placed around the tailings impoundment. Please include the removal cost in the cost estimate.
22. Does Item No. 3 of the Cost Estimate include perforations for all of the units mentioned in Sections 4.8.2, 4.8.4, and 4.8.5?
23. Does Item No. 4 of the Cost Estimate just include costs for regrade or does it include hauling of cover material? Please add the costs if they aren't already in the estimate.
24. Is the old shaft and headframe onsite covered under the NM Mining Act as disturbance? If so please provide FA in the Cost Estimate for reclamation/demolition of this item.
25. Is the current water production well on the site located within the old shaft or in a separate location? Please include the location of the water production well on a map.

Comments from NM Dept. of Cultural Affairs Historical Preservation Division

1. Please read attached November 16, 2020 letter from the NM Dept. of Cultural Affairs Historical Preservation Division.

Comments from NM Dept. of Game and Fish

1. Please read attached February 26, 2021 letter from the NM Dept. of Game and Fish and respond to the following concerns:
 - A. Restricting access of wildlife and domestic animals to toxic chemicals or otherwise harmful materials.

- B. Tailing impoundment wildlife exclusion measures.
- C. Seed mix concerns.

Comments from NM Environment Dept.

1. Please read attached February 26, 2021 letter from the NM Environment Dept. and respond to MECS Comments 1-11.

MMD is available to discuss this letter at your convenience. Please contact Clint Chisler, Permit Lead at (505) 467-9589 or by email at clinton.chisler@state.nm.us if you would like to discuss further or to schedule a meeting.

Sincerely,



Clint Chisler, Permit Lead
Mining Act Reclamation Program/MMD

Permit No. HI001RE

Attachment: Agency Comments



Michelle Lujan
Grisham
Governor

STATE OF NEW MEXICO
DEPARTMENT OF CULTURAL AFFAIRS
HISTORIC PRESERVATION DIVISION

BATAAN MEMORIAL BUILDING
407 GALISTEO STREET, SUITE 236
SANTA FE, NEW MEXICO 87501
PHONE (505) 827-6320 FAX (505) 827-6338

November 16, 2020

Clint Chisler,
Permit Lead – Permit LU001RE
Mining Act Reclamation Program (“MARF”)
Mining and Minerals Division
1220 South Saint Francis Drive
Santa Fe, NM 87505

Re: HPD Log# 114148, request for comment regarding the Banner Mill Permit No. HI001RE Standby Status and Updated Closeout Plan and Financial Assurance application.

Dear Mr. Chisler:

I am writing in response to your request for comment on the above referenced permit modification received at this office November 10, 2020

Pursuant to 19.10.5.505 NMAC, Permit Modifications and Revisions, the Director shall determine whether a permit modification would have an adverse impact on cultural resources listed on either the National Register of Historic Places or the State Register of Cultural Properties or be located in a known cemetery or other burial ground.

According to our files, there are no cultural resources listed on either the National Register of Historic Places or the State Register of Cultural Properties in the modified permit area. There are also no known cemeteries or other burial grounds. Based on this information, this permit modification will have no adverse impacts to cultural resources listed on the National or State Registers.

Although there are no cultural resources listed on either the National Register of Historic Places or the State Register of Cultural Properties, significant portions of the mine permit area have never been archeologically surveyed, If any intact land surfaces will be disturbed by activities associated with this closeout plan/permit modification, this office recommends that a cultural resources survey be conducted on mine property where this new ground disturbance will occur.

This survey should be performed by a qualified professional to determine if any historic or archaeological properties are present and if so, to provide documentation of those resources to our office. This information can then be used to evaluate the National Register of Historic Places eligibility of any resources identified during the survey and determine project effects on those resources. A list of state permitted archaeologists and archaeological firms are available from this office upon request or can be downloaded from our web site at:

<http://www.nmhistoricpreservation.org/documents/consultants.html>

If you have any questions concerning these comments, please do not hesitate to contact me by phone at (505)-452-6115 or e-mail me at richard.reycraft@state.nm.us

Sincerely,

Richard Reycraft

Richard. Reycraft
Staff Archaeologist



DIRECTOR AND SECRETARY
TO THE COMMISSION
Michael B. Sloane

STATE OF NEW MEXICO
DEPARTMENT OF GAME & FISH

One Wildlife Way, Santa Fe, NM 87507
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Cebolla
DAVID SOULES
Las Cruces
ROBERTA SALAZAR-HENRY
Las Cruces

26 February 2021

Clint Chisler, Permit Lead
Permit Lead, Mining Act Reclamation Program
Mining and Minerals Division (MMD)
1220 South St. Francis Drive
Santa Fe, NM 87505

RE: Revision 20-1 Application for Standby Status, Updated Closeout Plan, and Financial Assurance, Pyramid Peak Mining LLC, Banner Mill, Hidalgo Co., Permit No. HI001RE; NMDGF Project No. NMERT-876.

Dear Mr. Chisler,

The New Mexico Department of Game and Fish (Department) has reviewed the updated Closeout Plan submitted by Pyramid Peak Mining, LLC (Pyramid). A site inspection was conducted on 11 February 2021 by staff from the Department, MMD, New Mexico Environment Department and the Operator. The Department provides the following comments;

Section 4.5.2, Wildlife Protection, lists mitigation measures that will be implemented to protect wildlife. Line a) states "Restricting access of wildlife and domestic animals to toxic chemicals or otherwise harmful materials". To prevent wildlife and domestic animals from accessing toxic chemicals and other materials known to be harmful, from sources other than the tailings impoundment pond, the Department recommends that Pyramid utilize closed containment systems. Closed containment systems require minimal or no maintenance and can be relocated to another site when no longer needed. Closed containment systems also eliminate soil contamination, reduce reclamation expenses, and will not attract wildlife.

The perimeter of the tailings impoundment pond is currently fenced in accordance with the Department's fencing guidelines to exclude terrestrial wildlife. The tailings pond is currently dry because the mill has not operated for a number of years. However; when and if the mill comes off standby and the tailings containment pond water is determined to be harmful to flying animals, such as birds and bats, the pond should also be netted to exclude flying animals from contacting contaminated water and to prevent wildlife entrapment. Extruded plastic, knit or woven netting material is preferred. Monofilament nylon netting should not be used due to its tendency to ensnare wildlife and cause injury or death. All materials should be resistant to corrosion and ultraviolet radiation. The Department recommends a mesh size of $\frac{3}{8}$ inch to exclude smaller animals. The Department is available for consultation regarding netting options for site-specific pond sizes.

The Department concurs with reclamation seed mix in Table 4.1, and also recommends that seed test results are requested from the vendor in order to avoid inadvertently introducing non-native species to the reclamation site. Any alternate seeds used to substitute for primary plant species that are unavailable at the time of reclamation should also be native. When possible, the Department recommends using seeds that are sourced from the same region and habitat type as the reclamation site.

Thank you for the opportunity to review and comment on the updated Banner Mill Closeout Plan. If you have any questions, please contact Ron Kellermueller, Mining and Energy Habitat Specialist, at (505) 270-6612 or ronald.kellermueller@state.nm.us.

Sincerely,

Matt Wunder, Ph.D.
Chief, Ecological and Environmental Planning Division

cc: USFWS NMES Field Office



Michelle Lujan Grisham
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Howie C. Morales
Lieutenant Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Ground Water Quality Bureau

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James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

MEMORANDUM

Date: February 26, 2021

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

Through: Anne Maurer, Team Leader, Mining Environmental Compliance Section

From: George Llewellyn, Mining Environmental Compliance Section
John Moeny, Surface Water Quality Bureau
Sufi Mustafa, Air Quality Bureau

Subject: **NMED Comments, Standby Status, Updated Closeout Plan and Financial Assurance, Revision 20-1, Banner Mine and Mill, Pyramid Peak Mining LLC, Hidalgo County, New Mexico Mining Act Permit No. HI001RE**

The New Mexico Environment Department (NMED) received correspondence from the Mining and Minerals Division (MMD) on November 9, 2020 requesting NMED review and provide comments on the above-referenced MMD permitting action. Pursuant to the Mining Act, this is a regular existing mine with Mining Act Permit No. HI001RE. MMD requested comments on the Revision 20-1 application no later than December 9, 2020. A site inspection was originally scheduled on November 16, 2020 but was postponed until February 11, 2021 due to COVID-19 restrictions. Subsequently, MMD requested comments by February 25, 2021. NMED has the following comments.

Background

Pyramid Peak Mining, LLC (Applicant) submitted the Revision 20-1 application for Standby Status on March 13, 2020 and a draft Closure/Closeout Plan (CCP) in August of 2020.

Air Quality Bureau

The Air Quality Bureau comments are attached.

Surface Water Quality Bureau

The Surface Water Quality Bureau comments are attached.

Mining Environmental Compliance Section (MECS)

MECS has the following comments:

1. MECS has no comments on the standby status request.
2. Section 4.3, Topsoil Salvage states *“topsoil and/or overburden material has been recovered from construction activities throughout the Banner Mill Site (BM) and collected and stockpiled for use in reclamation. The cover contains native alluvial material and/or rock fragments 25% by volume ranging in size from three to ten inches.”* The cover stockpile is located approximately 350 feet west of the Tailing Dam and contains large rock fragments and crusher fines. Without a greater distribution of rock fragments, the cover material may be highly erodible. Additionally, there is an insufficient quantity of cover in this stockpile to complete all the reclamation requirements. Other sources of suitable borrow need to be identified for reclamation. Please identify other potential areas of borrow material and provide volume estimates.
3. Section 4.7 states *“a Construction Quality Assurance (CQA) plan will be submitted to MMD for approval no less than 180 days prior to commencement of closeout construction.”* The CQA plan must include ‘test pitting’ to ensure the in-place cover thickness meets the approved design.
4. Section 4.8.3 states *“following completion of operation, the Tailings remaining within the Dry Stacking Unit will be consolidated in the Tailings Impoundment or removed from the Banner Mill Site for secondary uses.”* The Applicant must complete soil sampling confirmation testing to ensure all impacted soils are removed from the Dry Stacking Units prior to closeout.
5. DP-1651, Condition C101.A, states *“The permittee is authorized to increase the capacity of the Tailings Impoundment in accordance with the June 2013 submittal titled Banner Mill Tailings Dam Enlargement Plans and Specifications, included as Attachment B-5.1 to the June 21, 2013 Application for Discharge Permit Renewal and Modification.”* The cost estimate and associated financial assurance must reflect the costs of reclaiming the expanded footprint of the tailing impoundment after the dam is raised.
6. Section 4.8.6 states *“all stockpiles such as waste dumps, topsoil stockpiles, and ore piles will be utilized as cover material in the closeout process.”* Pursuant to Condition C105.B

in DP-1651, prior to processing any ore from sources other than the Summit Mine, the material will need to be characterized to determine if it is acid generating or has the potential to generate leachate that may impact groundwater and surface water. No “waste dumps” are permitted at the Banner Mine and Mill and tailing material is not approved as cover material. The CCP needs to include reclamation of any ore stockpiles left on-site. In the event ore from sources other than the Summit Mine is processed on-site ore stockpiles may not be suitable as cover material. The Applicant should identify adequate sources of borrow material as requested in comment 1 to accommodate full reclamation of the site.

7. Monitoring Well No. 1 (MW-1) is identified as a groundwater monitoring location at closure both in the CCP and DP-1651 (2019). DP-1651 approves a replacement well for MW-1 when the Tailing Dam is raised. Appendix A must include the costs for plugging and abandoning MW-1.
8. In Appendix A, the post-closure analytical costs assume two sampling events per year for 12 years. DP-1651 requires quarterly water quality sampling. The costs need to be updated to reflect quarterly sampling.
9. Appendix A, Item 2 identifies costs associated with a soil investigation (\$50,000). Please address whether or not the cost includes soil confirmation testing in the Dry Stacking Unit following impacted material removal. Please add additional costs associated with soil confirmation testing of this area if the soil investigation costs do not cover this.
10. Appendix A needs to include the basis for all direct costs including the sources used to develop these costs (i.e., RSM means, direct quotes, cost centers, etc.).
11. Appendix A does not include a cost estimate for removal and disposal of hazardous waste. Please include a line item to address the costs for removal and disposal of hazardous waste.

NMED Summary Comment

Additional information is needed prior to NMED determining that the draft CCP will be protective of the environment. NMED will make this determination once the applicant has submitted the information requested above.

If you have any questions, please contact Anne Maurer at (505) 660-8878.

cc: Clint Chisler, Lead Staff, EMNRD-MMD
Kurt Vollbrecht, Program Manager, MECS

Holland Shepherd, Program Manager

February 26, 2021

Page 4 of 4

Shelly Lemon, Bureau Chief, NMED-SWQB

Elizabeth Bisbey-Kuehn, Bureau Chief, NMED-AQB



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James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

MEMORANDUM

Date: February 24, 2021

To: Anne Mauer, Mining Act Team Leader
Mining Environmental Compliance Section
Ground Water Quality Bureau (GWQB)

From: John Moeny
Watershed Protection Section
Surface Water Quality Bureau (SWQB)

Subject: **Request for Review and Comment, Banner Mill, Application for Standby Status, Updated Closeout Plan and Financial Assurance, Revision 20-1, Hidalgo County, New Mexico Mining Act Permit No. HI001RE.**

On November 9, 2021, NMED received a request for comments regarding an updated closure-closeout plan (CCP) and request for standby status for the Banner Mill located south of Lordsburg.

Summary of Proposed Action

Pyramid Peak Mining, LLC ("Applicant") has submitted a revised CCP that describes reclamation and site conditions for the Banner Mill while also seeking to put the facility on standby status. Existing facilities at the Banner Mill include the ore processing equipment housed within the mill building, lined tailing decant cells, lined tailings impoundment, lined stormwater collection pond for the mill area, tailing dry stack area and ancillary out-buildings. At closure, the mill site will remain in support of the Industrial Post-Mining-Land-Use (PMLU). Other non-industrial areas will be reclaimed by perforating HDPE liners, consolidating remnant tailings into the impoundment, ripping and regrading disturbed areas and placing 24 inches (12" of growth medium over 12" of fill) of cover and reseeding to achieve a wildlife PMLU.

Relevant State and Federal Water Quality Regulations

The Banner Mill currently has stormwater permit coverage from the EPA using a Multi Sector General Permit (MSGP) under tracking number NMR05HA95. That permit expired in 2020,

however facilities are allowed a grace period until May 30, 2021 to update their Stormwater Pollution Prevention Plan (SWPPP) and submit a new Notice of Intent under the 2021 MSGP which becomes effective on March 1, 2021. For more information, please see: <https://www.epa.gov/npdes/stormwater-discharges-industrial-activities-epas-2021-msgp>

Permit coverage needs to remain current during standby status.

Stormwater at closure will drain west to an unclassified arroyo within the Animas Valley closed basin. New Mexico water quality standards including General Criteria (20.6.4.13 NMAC) apply to all waters of the state at all times, and standards for Intermittent water bodies (20.6.4.98 NMAC) apply to all unclassified waters of the state until a hydrology protocol (HP) survey is conducted and a Use Attainability Analysis (UAA) is approved by the Water Quality Control Commission (WQCC) in accordance with 20.6.4.15 NMAC.

Recommendations to protect surface water quality

The SWQB recommends increasing the cover material to 36" from the proposed 24" to prevent the potential for wind and water erosion of the cover before adequate vegetation can be established.

The SWQB also recommends against using fertilizer to aid the establishment of vegetative cover. Most native species are adapted to nutrient poor soils and are quickly outcompeted by ruderal species that grow readily in amended soils.

The SWQB recommends approval of the CCP and the applicant's request for standby status.

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



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James C. Kenney
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Jennifer J. Pruett
Deputy Secretary

MEMORANDUM

DATE: December 7, 2020

TO: Kurt Vollbrecht, Program Manager, Mining Environmental Compliance Section

FROM: Sufi Mustafa, Staff Manager, Air Dispersion Modeling and Emission Inventory Section, Air Quality Bureau.

RE: Request for Review and Comment, Regular Existing Mine Revision Application for Standby Status, Updated Closeout Plan, and Financial Assurance ("Revision 20-1"), Pyramid Peak Mining LLC; Banner Mill, Hidalgo Co., NM Permit Tracking No. HI001RE

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

This facility was issued an air quality permit for the processing of the mined material.

Details

Pyramid Peak Mining LLC has requested for standby status for its Banner Mill site along with an update of Closeout Plan and Financial assurance. The mine operation has been in standby status since 2013. Currently the site does not have any activity such as gravel or ore crushing. The updated closeout plan will not cause any change in air quality impact from this site.

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:

Paragraph (1) of Subsection A of 20.2.72.200 NMAC, *Application for Construction, Modification, NSPS, and NESHAP - Permits and Revisions*, states that air quality permits must be obtained by:

“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.”

Further, Paragraph (3) of this subsection states that air quality permits must be obtained by:

“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 19.10.3.302 NMAC, *Minimal Impact Exploration Operations*:

“A minimal impact exploration operation will not exceed 1000 cubic yards of excavation per permit. Disturbances for constructed roads, drill pads and mud pits shall be no more than 5 acres total and will not be counted in the excavated materials. The type of road construction, the number and type of drill pads, and other disturbances when considered with site specific conditions will be major factors in determining eligibility for minimal impact status which is in the discretion of the director.”

The above is not intended to be an exhaustive list of all requirements that could apply.

Fugitive Dust

Fugitive dust is a common problem at mining sites and this project will temporarily impact air quality as a result of these emissions. However, with the appropriate dust control measures in place, the increased levels should be minimal. Disturbed surface areas, within and adjacent to the project area, should be reclaimed to avoid long-term problems with erosion and fugitive dust. EPA's *Compilation of Air Pollutant Emission Factors, AP-42, "Miscellaneous Sources"* lists a variety of control strategies that can be included in a comprehensive facility dust control plan. A few possible control strategies are listed below:

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 from MMD.

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) 476-4318.