

Department of Environmental Quality

To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.



Dave Freudenthal, Governor

John Corra, Director

February 28, 2008

Ms. Judith Bush
 Managing Partner – Bush Ranches
 2313 County Rd 64
 Carrying Place, Ontario
 Canada KOK 1 LO

Permit No. CT-7113

Dear Ms. Bush:

Enclosed please find a copy of the Air Quality Permit CT-7113 to install portable crushing/screening equipment with an initial location at the Roger's Rock Pit in the NW1/4NE1/4 of Section 25, T52N, R62W, approximately eight (8) miles east-northeast of Sundance, in Crook County, Wyoming.

Your comments received during the public comment period were considered in the final permit. A response to each comment is provided below. No conditions have been changed as result of the comments.

1. Official notification of adjacent landowners.

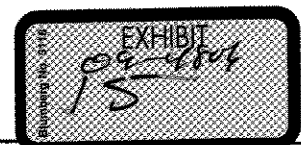
Response – The requirements of Wyoming Air Quality Standards and Regulations (WAQS&R) Chapter 6, Section 2(m) state that a copy of the public notice is to be advertised in a newspaper of general circulation in the area of the proposed source. The Division's practice throughout the years of implementation of the permitting requirements under Chapter 6, Section 2 has been to also place the application and the Division's analysis in the office of the County Clerk. The Division has not notified any adjacent landowners other than the above described process.

2. Other non-air quality issues such as noise and water usage/source.

Response – The Division does not have the authority to deny or condition an air quality permit based upon other impacts which may be caused by a facility such as noise or water usage/source.

Noise - The State of Wyoming has no rules or regulations addressing noise.

Water - The conditions of the permit require water to be used to control fugitive emissions, but the Division does not require applicants to identify the amount of water to be used or the source of the water.



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ADMIN/OUTREACH (307) 777-7937 FAX 777-3610	ABANDONED MINES (307) 777-6145 FAX 777-6462	AIR QUALITY (307) 777-7391 FAX 777-5616	INDUSTRIAL SITING (307) 777-7369 FAX 777-5973	LAND QUALITY (307) 777-7756 FAX 777-5864	SOLID & HAZ. WASTE (307) 777-7752 FAX 777-5973	WATER QUALITY (307) 777-7781 FAX 777-5973
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3. Hours of operation.

Response – The permit applicant has represented the hours of operation for the portable crushing/screening equipment as 12 hours/day, 5 days/week and 35 weeks/year. The Division is satisfied that the control requirements established through the Best Available Control Technology (BACT) process will insure the portable crushing/screening equipment complies with all applicable requirements of the Wyoming Air Quality Standards and Regulations. Therefore, the Division does not limit hours of operation.

4. Controlling dust emissions from portable crushing/screening equipment.

Response – The permit requires the use of Best Available Control Technology (BACT) to minimize emissions to the extent practicable during crushing/screening operations. Conditions of the permit addressing dust control are as follows:

4. That the allowable opacity for fugitive emissions associated with the crushing/screening equipment shall be limited to 15%, the allowable opacity for screen, conveyor transfer points and other fugitive emission points shall be limited to 10% as determined by 40 CFR, Part 60, Appendix A, Method 9.
5. That the crushing/screening equipment shall be equipped with a wet suppression system to control fugitive emissions from the crushing/screening equipment. The wet suppression system shall operated to the extent necessary comply with the allowable opacity limits established in condition 4.
6. That all unpaved portions of the haul roads, access roads, work areas and stockpiles associated with this crushing equipment shall be treated with water and/or chemical dust suppressants on a schedule sufficient to control fugitive dust from vehicular traffic and wind erosion.

Based on experience, the Division is confident that properly controlled crushing/screening operations, as required through conditions of the permit, will not result in an exceedance of air quality standards. However, compliance with the ambient air quality standards does not mean there will be no air quality impact.

5. Installing scrubbers on portable crushing/screening equipment.

Response – The Division's experience is that installing scrubbers on crushing/screening equipment that is portable is not technically feasible and is therefore not considered Best Available Control Technology (BACT), which is required by the Division.

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6. Controlling dust emissions from Roger's Rock Pit operations.


Response – The purpose of Bruening Rock Product, Incorporated's application is solely in regard to the portable crushing/screening equipment and does not address any changes to Permit CT-4526 for the Roger's Rock Pit, issued February 13, 2007 and held by Croell Redi-Mix. As such, the Division does not have the authority to deny or condition an air quality permit based upon air quality impacts which may be caused by another facility.

7. Monitoring of operations.

Response – Division personnel conduct periodic inspections (announced and unannounced) to insure compliance with permit conditions. Questions regarding compliance with the permit conditions should be directed to Tanner Shatto, District Engineer, Sheridan (307) 673-9337 or Bob Gill, Stationary Source Compliance Program Manager, Cheyenne (307) 777-7391.

If we may be of further assistance to you, please feel free to contact this office.

Sincerely,



David A. Finley
Administrator
Air Quality Division

cc: Tanner Shatto