



**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
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**Ursula Kramer, P.E.**  
Director

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April 10, 2012

**BY E-MAIL**  
[vrozon@oracleminingcorp.com](mailto:vrozon@oracleminingcorp.com)

Mr. Victor Rozon  
Vice President of Operations  
Oracle Ridge Mining, LLC  
10445 N. Oracle Rd., Ste, 101  
Oro Valley, AZ, 85737

Re: Response to Comments Submitted March 23, 2012 (Permit # 6134)

Dear Mr. Rozon:

Enclosed in the attached document is Pima County Department of Environmental Quality's (PDEQ) response to Oracle Ridge Mining LLC's (ORM) comments to the Oracle Ridge Mine draft installation & operating permit.

If you have any questions, comments or corrections to the document, please call me at (520) 243-7400.

Sincerely,

A handwritten signature in black ink, appearing to read "Mukonde Chama".

Mukonde Chama, P.E.  
Air Permits Supervisor

Enclosure: PDEQ Response to ORM Installation & Operating Permit Draft Comments

cc: Tom Sheber by email [Tom.Sheber@tetrattech.com](mailto:Tom.Sheber@tetrattech.com)



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## PDEQ Response to Oracle Ridge Mine Comments

Pima County Department of Environmental Quality (PDEQ) has accepted some comments as requested. This response addresses those comments that were not accepted or were accepted but modified to comply with PCC, the permit or applicable federal standards. Page numbers refer to the original draft documents sent to ORM for comment.

### Installation & Operating Permit Draft Document Comments

#### 1. *Permit Summary, Page 3 – Citation of federally enforceable conditions*

Each condition has been cited with respect to applicability of federal enforceability. A note on page 3 of the Summary states that all conditions in the permit **are not** federally enforceable unless noted as such. Those conditions that are federally enforceable are noted as such in Part B of the permit. Conditions will be cited as federally enforceable should an emission unit/ process be subject to a federal regulation such as a New Source Performance Standard (NSPS) or National Emission Standards for Hazardous Air Pollutants (NESHAP). Since this is not a Title V permit, there are no citations that reflect 40 CFR Part 70 authority.

#### 2. *Permit Summary, Page 3 – Permit Shield*

The permit shield has been incorporated on page 16 of the permit under XIX of Part A.

#### 3. *Page 5 – Part A, III.B.2 Requested Deletion of Acid Rain Program requirement*

As discussed with Tetra Tech during submission of your comments this requirement contained in Part A of your permit is part of a standard set of general conditions contained in all permits issued by Pima County and cannot be deleted.

#### 4. *Pages 6, 8 & 9 – Part 70 citations*

Since this is a Class II permit and not a Title V/ Class I permit, Part 70 is not applicable.

#### 5. *Page 12 – XII.B Performance Tests*

- a. PDEQ acknowledges that there are no stacks onsite. This is a general condition contained in Part A's of issued PDEQ permits and would only apply should a performance test be required.
- b. This requirement would apply to any initial Method 9 observation opacity tests to show that NSPS affected equipment comply with federal opacity requirements.

6. *Page 15 – XVI Testing Requirements*

See 5.a above. No stack testing is required unless identified in the specific conditions of Part B.

7. *Page 19 – Part B, Section 1: Specific Provisions – Table & Page 29*

PDEQ has added the emission unit ID for the Lime System Fabric Filter & Xanthate Bag Breaker Dust Control to the table on page 29 (Part B, Section 3).

8. *Page 22 – Part B, Section 1: III Recordkeeping Requirements*

The 12-month rolling total for concentrator ore processing can be found on page 24. This Section addresses copper concentrate processing throughput that where the 3000 STPD is limited.

9. *Page 23 – Part B, Section 1: IV.A.1 – Reporting Requirements*

Opacity observations are viewed as performance tests when complying with performance test(s) required by the NSPS.

10. *Page 23 – Part B, Section 1: V.A – Testing Requirements*

Opacity observations are required whether there is a stack or not. Method 9 does not state that observations of emissions from affected equipment be made while viewing emissions from a stack.

11. *Page 27 – Part B, Section 2: III – Recordkeeping Requirements*

PDEQ will not include the 146,730 lbs/ yr MICB and AERO 343 Xanthate limitation in the permit. ORM operating 8760 hours per year leads to VOC emissions of approximately 34 tpy. PDEQ has no authority to include a limitation in a permit when operating at maximum capacity will not lead to an exceedance of any thresholds, change the classification of the facility or cause ORM to be subject to an applicable requirement.

11. *Page 28 – Part B, Section 2: V.A.1 – Testing Requirements*

PDEQ has identified the performance test required in V.A.1 of Part B, Section 3 by clarifying the citation requiring the performance tests.

12. *Page 29 – Part B, Section 3: I.A.1 – Emission Limitations and Standards*

This emission rate is a Pima County Code enforceable rate and is calculated by replacing P in the equation with the maximum process rate of the unit. The calculated emissions are what is allowable from the unit on per hour basis. As discussed with Mr. Thomas J. Sheber of Tetra Tech BAS, Inc during submission of comments, it is highly unlikely that ORM would ever approach the allowance given by this equation.

13. *Page 38 – Part B, Section 5: I.A.1 and I.A.1.b – Operational, Emission Limitations and Standards*

Both units are already identified as emergency units in the applicable units table in Section % and in I.A.1 and I.A.2. The emission standards in the table under I.A.1.b on page 38 are for the emergency generator and are **not** for “fire pump engines”.

14. *Page 39 – Part B, Section 5: I.A.2.a – Emission Limitations and Standards*

PDEQ has verified that the original emission rates in the draft permit identified for engines manufactured after 2010 are correct. The NSPS does allow owners to use 2009 emission rates if the fire pump has a rated speed greater than 2,650 rpm. It is not clear but documentation submitted seems to indicate the speed to be 2,800 rpm. PDEQ requests clarification of the rated speed for the fire pump. Should ORM choose to comply with the 2009 emission rates, PDEQ will change all the emission rates from 2010 to correspond to 2009 rates.

Installation & Operating Permit Draft Technical Support Document Comments

1. *Page 6 – VI.A.2 - Applicability*

PDEQ will not add diesel to the list of applicable fuels. NESHAP Subpart CCCCCC only applies to gasoline dispensing facilities at sources. Diesel fuels storage tanks are addressed on page 9 of the TSD under Section 6.