March 21, 2018

Mr. John Shanahan
Tintina Montana, Inc.
17 E Main Street
White Sulphur Springs, MT 59645

RE: Montana Air Quality Permit (MAQP) #5200-00

Sent via email: JShanahan@sandfireamerica.com

Dear Mr. Shanahan:

The Montana Department of Environmental Quality-Air Resources Management Bureau (Department) has completed a review of Tintina Montana's (Tintina) air permit application submitted on February 20, 2018, for the proposed Black Butte Copper Project near White Sulphur Springs, Meagher County, Montana. Tintina's application has been assigned MAQP #5200-00. This review followed a pre-application meeting held on February 15th, and a March 2nd meeting to discuss initial Department questions. The Department has deemed the application incomplete and requests the following information:

1. Modeling and Air Quality Analysis. After a review of the modeling and the air quality analysis, the Department determined Tintina must provide/revise the following information:

    a. Table 6-4 incorrectly uses "zero" for both the background concentration for particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM_{10}) and carbon monoxide (CO). Neither value represents actual background concentrations for these two pollutants and appropriate background values will need to be substituted into the analysis. This will also require a correction to the background values in Table 6-6 and updated comparisons to the National Ambient Air Quality Standards and Montana Ambient Air Quality Standards, (NAAQS and MAAQS, respectively).

    b. Table 6-7 doesn't show the 24-hr particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($PM_{2.5}$) significant impact level (SIL) being exceeded as indicated, but the resulting 1-hr nitrogen dioxide (NO_2) concentration is above the SIL and is not presented in the text and analysis as being above the SIL. Once Table 6-7 is corrected, Table 6.8 will also need to be updated.

    c. Please provide additional detail on the QA procedures and representativeness of the on-site met data used for the analysis as required by 40 Part 51 Code of Federal Regulations (CFR) Appendix W.

d. AERMINUTE wasn't used for the National Weather Service data. Please provide an explanation for the combination of data used for the analysis.

e. For the F6, F8, F10, F13, and F16 calculations – Please explain why the emissions in lb/hr are reported by multiplying by 2 transfers (load plus dump) but the modeling input then divides by 2 transfers.

f. The storage pile emission inventory (EI) all have disturbance per day numbers that are not used. All the piles have a disturbance area that is the same regardless of the disturbances per day. Please explain how the emissions from each pile are the same even if the number of disturbances per day are different?

g. F23 uses 24 hr/day to calculate the wind erosion emissions. All other storage piles use 12 hr/day. Please provide an explanation of how storage pile hours may differ.

h. The emission rate for PJO F3 – Year 3, uses the emissions from Year 2 (cell G81), instead of year 3 (cell G82). This changes the emissions for a number of road segments that will impact the modeling results.

i. The Department believes a clear explanation of the emission inventory versus how the emission inventory numbers were actually input into the model would be helpful to further determine the appropriateness of modeling assumptions. Since the project is not being modeled by "phase", having a "cross-walk" to clearly call out the basis of the modeling inputs is needed.

The requested information must be submitted to the Department no later than April 20, 2018. If the requested information is not submitted on or before the date specified, the application is considered withdrawn unless the applicant requests, in writing, an extension of time for submission of the additional information.

The Department is available for additional follow-up discussions as needed. If you have any questions or concerns, please contact me by phone at (406) 444-6711 or by e-mail at chenrikson@mt.gov.

Sincerely,

Craig Henrikson

Craig Henrikson, P.E.
Environmental Engineer
Air Quality Bureau
(406) 444-6711

cc: Debbie Skibicki, Bison Engineering Inc., dskibicki@bison-eng.com
Julie Merkel, Air Quality Bureau
Kristen Martin, Air Quality Bureau