

Compass Minerals – Additional Information Regarding Comment H-64 submitted by Western Resource Advocates, Utah Chapter of Sierra Club, Utah Physicians for a Healthy Environment, and Heal Utah: Review of BACT Analyses for Compass Minerals (see VIII. Technical Report. August 14, 2018)

Comment 2- Compass' BACT analysis for fugitive emissions has several flaws. First, the BACT analysis does not provide calculations of current actual and potential emissions for fugitive emissions sources, and the BACT analysis fails to adequately document how emissions were determined.

UDAQ Response: UDAQ recognizes the deficiencies surrounding fugitive emissions, and provided as much information as we had received from the source. New information has since been provided, and has been reviewed. Due to the nature of the fugitive emissions and the scale of operations on site, coupled with the moisture content of the product, control measures of any kind around fugitive emissions were not economically or technically feasible for the source. However, changes to the sources Approval Order will be made as a result of the new information that will incorporate emission mitigation strategies to reduce environmental impacts. No changes were made to the TSD or Part H limits as a result of this comment.

Comment 3 - Compass should have provided the emissions calculations for these (fugitive) sources, providing the amounts of materials handled. Further, it is not clear what silt content was assumed for the emission factors. In addition, Compass provided no basis for the assumed 90% control efficiency for moist salt emissions, did not identify the moisture content of moist salt, and did not identify the amount of salt considered to be moist salt versus the amount of salt considered to be dry salt. Compass should have more clearly spelled out its emissions calculations for these and other fugitive emission sources, so it can be ascertained whether Compass accurately calculated emissions from these sources.

UDAQ Response: UDAQ recognizes the deficiencies surrounding fugitive emissions at the source; both how they were calculated as well as the control efficiencies used in those calculations. We were working with the information we had been provided. New information has since been provided, and has been reviewed. Where necessary emission calculation methodologies have changed, the new calculation methods rely on moisture content (actual historical and current moisture content has been provided by the source) to estimate emissions. Control efficiencies have been eliminated from the calculations. Changes to the sources Approval Order will be made as a result of the new information, requiring ongoing monitoring of moisture content as well as strict opacity limits. No changes were made to the TSD or Part H limits as a result of this comment.