

August 10, 2006

Matthew DeBurle
Supervisor, Permitting Branch
Nevada Division of Environmental Protection
Bureau of Air Pollution Control
901 South Stewart Street, Suite 4001
Carson City, NV 89701-5249

Re: Proposed Minor Modification of Title V Operating Permit for Barrick Goldstrike

Dear Mr. DeBurle:

We have reviewed the Bureau of Air Pollution Control's ("BAPC") proposed minor modification of the title V permit for Barrick Goldstrike, which we received on June 27, 2006. We offer the following comments on the analysis supporting the proposed modification. During our discussion today, we agreed that BAPC would make the suggested changes to its Technical Review document, and send us the revised analysis with the final permit.

BAPC's Technical Review document does not identify the power source for the new portable batch plant, or document NO_x and CO emissions associated with the project. During our review, BAPC staff clarified that the plant will be powered by an existing generator. As you know, a NO_x increase of 40 tpy or more would trigger review under the Prevention of Significant Deterioration ("PSD") program, and an engine supplying power for a batch plant could approach this level of emissions. Therefore, it is important to include such support equipment when determining if the project will result in a significant net emissions increase. EPA recommends that BAPC make the following additions to the Technical Review document to demonstrate for the administrative record that the modification does not trigger PSD for NO_x or CO.

Since the new portable batch plant cannot be operated without the use of the existing generator, the emissions from the generator must be included in the PSD analysis. If the engine, and thus the project emissions are limited to less than 40 tpy of NO_x and 100 tpy of CO, then no further analysis is required regarding PSD applicability for these pollutants, since total emissions are below the significant modification thresholds. If total emissions are over either or both of these thresholds, then an emission increase calculation is required to determine if the project will result in a significant net emissions increase. Baseline actual emissions must be determined for the engine, and total potential emissions or future projected actual emissions must be determined for the proposed project. If the latter is selected, the analysis should also document that the

engine's emission increase could have been accommodated during the consecutive 24-month period used to establish the baseline actual emissions.

Finally, we note that the Technical Review does not address PM-2.5. To make the evaluation complete, EPA recommends that BAPC discuss PM-2.5 applicability, consistent with EPA's two policy memoranda related to the implementation of New Source Review for PM-2.5 ("Interim Implementation of New Source Review Requirements for PM-2.5," dated October 23, 1997, and "Implementation of New Source Review Requirements in PM-2.5 Nonattainment Areas," dated April 5, 2005). Together, both documents direct states to regulate PM-10 as a surrogate for PM-2.5. For your convenience we have enclosed hard copies of the documents, and emailed electronic versions on August 9, 2006.

Please contact Roger Kohn at (415) 972-3973 or kohn.roger@epa.gov if you have any questions concerning our comments.

Sincerely,

/ s /

Gerardo C. Rios
Chief, Permits Office
Air Division

Enclosures

cc: Andy Cole, Barrick