From: Carlos Espinosa
To: *EQB_Silica Sand
Subject: Comments on Silica Sand Tools
Date: Wednesday, January 22, 2014 10:21:57 AM

Two comments on the draft "Tools to Assist Local Governments in Planning for and Regulating Silica Sand Projects:"

1) More information on need to conduct monitoring at *every* silica sand facility would be helpful. There are a number of existing operations in Winona which are very small and handle only wet sand (above 2.5% moisture content – per local ordinance). If I told these operations they have to conduct monitoring for TSP, PM10, PM2.5, and PM4-silica – their first question is going to be "Why?" Especially given the data from larger facilities in Minnesota and Wisconsin which shows air quality levels in-line and sometimes far below federal and state thresholds. Some type of suggested exemption for small operations (e.g. below a certain throughput tonnage) that only handle wet sand would be helpful.

2) Recommendations on how to curtail fugitive dust from rear-dump semi trucks would be helpful. In Winona, none of the trucks used to transport silica sand are bottom dump.

Otherwise, I think the document looks pretty good. A lot of good information and great recommendations. Good work Jeff S. and others.

Thanks,

-Carlos

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