



**UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY
REGION 10**

1200 Sixth Avenue, Suite 155
Seattle, WA 98101

AIR & RADIATION
DIVISION

December 7, 2021

Alice Edwards, Director
Division of Air Quality
Alaska Department of Environmental Conservation
P.O. Box 111800
Juneau, AK 99811

Dear Ms. Edwards,

In your letter dated November 4, 2021, Alaska Department of Environmental Conservation (ADEC) Air Quality Division provided an updated request for a waiver of the lead (Pb) monitoring requirements at the Red Dog Mine. By this letter, Region 10 approves a waiver for lead monitoring at the Red Dog Mine. ADEC's waiver request was based on the results of dispersion modeling conducted by Teck Alaska Inc. (Teck), which were reviewed and approved by ADEC. The request was an update to the initial waiver request submitted June 12, 2020. The Red Dog Mine is a source of lead emissions exceeding 0.5 tons per year, which requires lead monitoring as specified in 40 C.F.R. Part 58, Appendix D, section 4.5(a). The lead emissions from Red Dog Mine were reported as 1.2 tons in the 2017 National Emissions Inventory, and 10.1 tons in the 2014 National Emissions Inventory.

According to 40 C.F.R. Part 58, Appendix D, section 4.5(a)(ii), the Regional Administrator may waive the requirement for lead source monitoring if the state can demonstrate that the source will not contribute to a maximum lead concentration in ambient air in excess of 50 percent of the lead National Ambient Air Quality Standards (NAAQS). A 5-year waiver for the lead monitoring requirement for Red Dog Mine was approved on August 11, 2016. The current waiver renewal request was timed to be in sync with the 5-year Air Monitoring Network Assessment, but the approval was delayed. The modeling approach and protocol for the Red Dog Mine conducted by Teck were consistent with the EPA's guidance, and were approved by the EPA. The results of this modeling demonstrates that the maximum ambient 3-month rolling average lead concentration at the mine does not exceed 50 percent of the lead NAAQS. This satisfies the requirement of remaining below 50 percent of the NAAQS, and, therefore, I approve a waiver for lead monitoring at the Red Dog Mine.

Pursuant to 40 C.F.R. Part 58, Appendix D, section 4.5(a)(ii), this waiver must be renewed every 5 years as part of the Alaska 5-year Air Monitoring Network Assessment. Therefore, if ADEC elects to renew the lead source-monitoring waiver, a formal written request to renew the lead source-monitoring waiver must demonstrate that the site conditions for which the previous modeling was conducted are still applicable. If site conditions have changed such that the previous modeling is no longer appropriate, then ADEC must update the modeling based on the current conditions.

This approval and existence of this lead source-monitoring waiver for the Red Dog Mine should be identified in the next ADEC Annual Ambient Air Monitoring Network Plan submitted to the EPA, after public review and comment, and shall be identified in all future Alaska Annual Ambient Air Monitoring Network Plans and the Alaska 5-year Air Monitoring Network Assessment Reports submitted to the EPA.

If you have any questions on the subject, please have your staff contact Sarah Waldo at (206) 553-1949 or waldo.sarah@epa.gov.

Sincerely,

Debra Suzuki, Manager
Air Planning, State/Tribal Coordination Branch