From:	Fernandez, Enric
To:	Jones, Dave F (DEC)
Cc:	Graham, Dan; Ejaz Memon; Kevin Lewis; Plosay, James R (DEC); Renovatio, James J (DEC); Germain, Grace (DEC); Meyer, Dan; Andrea Stacy; Shepherd, Don; Kirsten_King@nps.gov; Paul Burger; Allen, Tim; Catherine_Collins@fws.gov; Murrell, Jennifer S (DNR)
Subject:	RE: Draft Preliminary Construction Permit AQ0934CPT02 for the Donlin Gold Project
Date:	Wednesday, October 5, 2022 5:09:15 PM
Attachments:	image001.png image002.png AQ0934CPT02 Draft Preliminary TAR 09.15.22-Comments-20221005.docx Donlin TAR Table A-1 Checks and Revisions-20221005.pdf Donlin TAR App-C Tables Checks and Revisions-20221005.pdf

Dave
Attached is the annotated version of the draft TAR document, which includes Donlin's suggested edits.
PDF files of the TAR Appendix A, Table A-1, and Appendix C Tables C-1 through C-5 checks and revisions are also attached.
Table A-1 file provides the original table followed by the revised table on alternate pages.
The Appendix C tables file shows a side-by-side comparison of the original and the revised tables.
The changes are highlighted in orange color in these tables.
Our consultant, Air Sciences used logical expressions in Excel to compare and highlight the values that did not match their workbook to review these tables. Therefore, some of the highlighted changes may be insignificant and can be ignored, for example, within the rounding margin.

If you have any questions, please let us know.
We greatly appreciate the opportunity to comment.

Quyana

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From: Jones, Dave F (DEC) <dave.jones2@alaska.gov>
Sent: Friday, September 30, 2022 3:53 PM
To: Fernandez, Enric <efernandez@DonlinGold.com>
Cc: Graham, Dan <dgraham@DonlinGold.com>; Ejaz Memon <ememon@airsci.com>; Kevin Lewis <klewis@airsci.com>; Plosay, James R (DEC) <jim.plosay@alaska.gov>; Renovatio, James J (DEC) <james.renovatio@alaska.gov>; Germain, Grace (DEC) <grace.germain@alaska.gov>; Meyer, Dan <Meyer.Dan@epa.gov>; Andrea Stacy <Andrea_Stacy@nps.gov>; Shepherd, Don <Don_Shepherd@nps.gov>; Kirsten_King@nps.gov; Paul Burger <Paul_Burger@nps.gov>; Allen, Tim <tim_allen@fws.gov>; Catherine_Collins@fws.gov; Murrell, Jennifer S (DNR) <Jennifer.murrell@alaska.gov>
Subject: RE: Draft Preliminary Construction Permit AQ0934CPT02 for the Donlin Gold Project

Enric,

Thanks for supplying the Department with the marked up preliminary technical review of the permit and associated documents. I was able to download all of the files from the SharePoint site.

Needing more time to review the TAR is not an issue, just send us your review when complete.

I have begun to make the appropriate changes to the permit and had one Condition that I am requesting Donlin perform further review on the applicable EUs. The Good Air Pollution Control Practice Condition 47 (Standard Permit Condition VI, attached) is actually for more than just EUs with controls. The condition applies to all EUs that are significant, or EUs that are insignificant but have a control device (which exceptions). See the language below:

> **Emissions Unit Categories This Condition Applies to:** All emissions units that are not insignificant or that use a control device, except that Standard Permit Condition (SPC) VI does not apply
>
> 1. to any emissions unit subject to an emission standard in 40 C.F.R. 60, 40 C.F.R. 61, or 40 C.F.R. 63; or

2. if, for each emissions standard that applies, there is continuous emissions monitoring or the permit writer finds that continuous parametric monitoring or

frequency of other periodic monitoring is sufficient that equipment performance affecting emissions will not deteriorate between monitoring events.
The Department will use SPC VI in any operating permit unless the Department determines that emissions unit- or stationary source-specific conditions more adequately meet the requirements of 18 AAC 50. Include Condition 1.4 only as applicable.

Therefore, will you please re-verify the EUs that Donlin believes are applicable to this Condition?

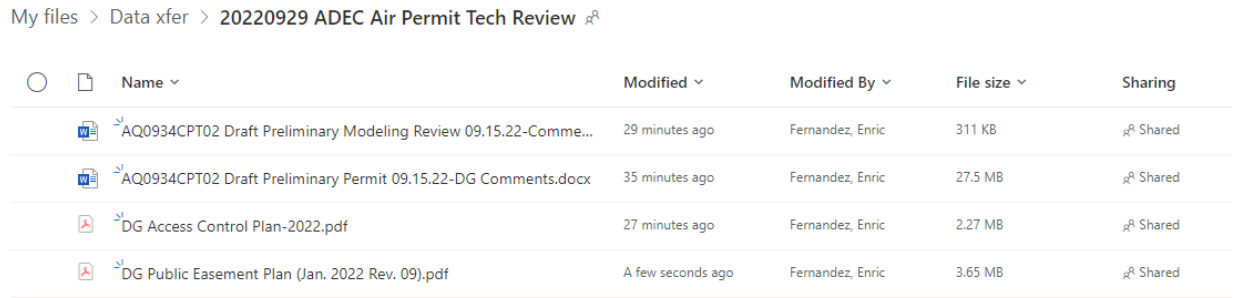
Regards,

Dave Jones
Environmental Engineering Associate I
ADEC – Air Quality – Juneau
dave.jones2@alaska.gov
907.465.5122

From: Fernandez, Enric <efernandez@DonlinGold.com>
Sent: Thursday, September 29, 2022 3:30 PM
To: Jones, Dave F (DEC) <dave.jones2@alaska.gov>
Cc: Graham, Dan <dgraham@DonlinGold.com>; Ejaz Memon <ememon@airsci.com>; Kevin Lewis <klewis@airsci.com>; Simpson, Aaron J (DEC) <aaron.simpson@alaska.gov>; Plosay, James R (DEC) <jim.plosay@alaska.gov>; Renovatio, James J (DEC) <james.renovatio@alaska.gov>; Meyer, Dan <Meyer.Dan@epa.gov>; Andrea Stacy <Andrea_Stacy@nps.gov>; Shepherd, Don <Don_Shepherd@nps.gov>; Kirsten_King@nps.gov; Paul Burger <Paul_Burger@nps.gov>; Allen, Tim <tim_allen@fws.gov>; Catherine_Collins@fws.gov; Murrell, Jennifer S (DNR) <jennifer.murrell@alaska.gov>
Subject: RE: Draft Preliminary Construction Permit AQ0934CPT02 for the Donlin Gold Project

[Internal]
Dave
We have completed a partial technical review of the preliminary construction permit:
Please follow the link below to access our review comments (note the link will expire October 16, 2021)
20220929 ADEC Air Permit Tech Review

The following files are provided:



- AQ* Draft Preliminary Modeling Review *.docx – This file includes Donlin Gold's comment on the Preliminary Modeling. Comments are editorial in nature.
- AQ* Draft Preliminary Permit *.docx – This file includes Donlin Gold's comments for the Preliminary Permit. Most of

these comments were discussed at our meeting on Monday, but feel free to reach out to us if you need further clarification or need to discuss.

- DG Public Access Control Plan-2022 – As noted in the comments in the Preliminary plan, the version of the Public Access Control Plan (PACP) included with the permit, includes a reference to the 2016 Donlin Gold Public Easement Plan, which was revised in 2022. Donlin Gold has revised the PACP to reflect this change. The only changes to the PACP are: (1) updated the reference from 2016 to 2022 Public Easement Plan, and (2) revised the date of the document to September 2022.
- DG Public Easement Plan *.pdf – A copy of Donlin Gold's Public Easement Plan revised January 2022. Note that changes between the 2016 and 2022 versions do not affect the location of the existing easement and proposed alternative access routes, but rather the process in which public easements will be closed or altered. Also note that this process in currently in permitting with ADNR.

Donlin Gold is still reviewing the TAR document and we ask the department for additional time to complete the review. We expect to be able to submit comments on the TAR no later than October 5th, 2022.
Please, let me know if you have any issues downloading the files indicated above.
Quyana

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From: Jones, Dave F (DEC) <dave.jones2@alaska.gov>
Sent: Thursday, September 15, 2022 1:32 PM
To: Fernandez, Enric <efernandez@DonlinGold.com>
Cc: Graham, Dan <dgraham@DonlinGold.com>; Ejaz Memon <ememon@airsci.com>; Kevin Lewis <klewis@airsci.com>; Simpson, Aaron J (DEC) <aaron.simpson@alaska.gov>; Plosay, James R (DEC) <jim.plosay@alaska.gov>; Renovatio, James J (DEC) <james.renovatio@alaska.gov>; Meyer, Dan <Meyer.Dan@epa.gov>; Andrea Stacy <Andrea_Stacy@nps.gov>; Shepherd, Don <Don_Shepherd@nps.gov>; Kirsten_King@nps.gov; Paul Burger <Paul_Burger@nps.gov>; Allen, Tim <tim_allen@fws.gov>; Catherine_Collins@fws.gov
Subject: RE: Draft Preliminary Construction Permit AQ0934CPT02 for the Donlin Gold Project

[External]
All,

I am re-sending this email without the attachments to ensure delivery to all recipients. The attachments can be downloaded from the link below.

Regards,

Dave Jones
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ADEC – Air Quality – Juneau
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907.465.5122

From: Jones, Dave F (DEC)
Sent: Thursday, September 15, 2022 1:28 PM
To: Enric Fernandez <efernandez@donlingold.com>
Cc: Graham, Dan <dgraham@DonlinGold.com>; Ejaz Memon <ememon@airsci.com>; Kevin Lewis <klewis@airsci.com>; Simpson, Aaron J (DEC) <aaron.simpson@alaska.gov>; Plosay, James R (DEC) <jim.plosay@alaska.gov>; Renovatio, James J (DEC) <james.renovatio@alaska.gov>; Meyer, Dan <Meyer.Dan@epa.gov>; Andrea Stacy <Andrea_Stacy@nps.gov>;

Shepherd, Don <Don_Shepherd@nps.gov>; Kirsten_King@nps.gov; Paul Burger <Paul_Burger@nps.gov>; Allen, Tim <tim_allen@fws.gov>; Catherine_Collins@fws.gov
Subject: Draft Preliminary Construction Permit AQ0934CPT02 for the Donlin Gold Project

Enric,

The Alaska Department of Environmental Conservation (Department) has reviewed the Construction Permit Application AQ0934CPT02 for the Donlin Gold Project and is providing Donlin Gold LLC with a copy of the draft preliminary permit, technical analysis report (TAR), and modeling review to review for technical accuracy. This is not a comment period, so please keep the scope of your comments to typographical and grammatical errors and correctness/completeness issues.

In the event the combined size of the attachments is to large to transmit or be received, they can also be downloaded from the following Alaska Zend To website: https://drop.state.ak.us/drop/pickup.php?claimID=Nk3mhjb2zR4cqT7b&claimPasscode=nzwYtaGNvhoUuRAB

Please review the draft preliminary permit, TAR, and modeling review, and provide corrections to the Department by September 29, or let us know if you need additional time or if you have any questions.

Regards,

Dave Jones
Environmental Engineering Associate I
ADEC – Air Quality – Juneau
dave.jones2@alaska.gov
907.465.5122