



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

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Seattle, WA 98101-3140

AUG 11 2016

OFFICE OF
AIR AND WASTE

Ms. Denise Koch
Director, Division of Air Quality
Alaska Department of Environmental Conservation
410 Willoughby Avenue, Suite 303
Juneau, Alaska 99811-1800

Dear Ms. Koch:

In your letter dated April 14, 2016, Alaska Department of Environmental Conservation requested a waiver of the lead monitoring requirements at the Red Dog Mine based on the results of dispersion modeling conducted by your staff. The Red Dog Mine is a source of lead emissions exceeding 0.5 tons/year which requires lead monitoring as specified in 40 C.F.R. Part 58, Appendix D, section 4.5(a).

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). The modeling approach and protocol for the Red Dog Mine conducted by ADEC were consistent with the EPA's guidance, and were approved by the EPA. The results of this modeling demonstrates that the maximum ambient air 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.

The approval and existence of this lead source-monitoring waiver for the Red Dog Mine should be identified in the next Alaska 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.

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 for renewal must be submitted to EPA 120 days prior to the expiration of this waiver. The formal request to renew the lead source-monitoring waiver must demonstrate that the site conditions for which the previous modeling was conducted are still appropriate. 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.

If you have any questions on this subject, please have your staff contact Mr. Keith Rose at (206) 553-1949 or rose.keith@epa.gov.

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Sincerely,



Timothy B. Hamlin
Director

cc: Ms. Barbara Trost
ADEC

Ms. Deanna Huff
ADEC