

July 12, 2001

A Subsidiary of Cominco American Incorporated

## VIA FACSIMILE: 907/269-3098

Tom Chapple
Director, Division of Air & Water Quality
Alaska Department of Environmental Conservation
555 Cordova Street
Anchorage, AK 99501

Re: Action Plan in Response to NPS Fugitives Study

Dear Mr. Chapple:

Cominco Alaska Incorporated is currently undertaking the following actions to address the risk of fugitive emissions related to the hauling of concentrate from the Red Dog Mine to the associated port facility.

- 1) Trucks leaving the Truck Unloading Building (TUB) at the port will be vacuumed off after each unloading cycle using the port vacuum truck. Our Materials Management personnel are currently contacting vendors and ordering brush-type attachments that will be used to brush off any fugitives collected on the trucks during the dumping cycle. Our mechanical engineers will be designing for construction a scaffolding that will be erected so that the tops of the trucks can be accessed for brushing and vacuuming. Vacuuming will commence upon receipt of the brushes. The scaffolding will require 10-14 days to erect.
- 2) Trucks will be washed off at the mine site after each loading cycle. Once the trucks are weighed they will proceed directly to a wash pad and will be washed down. Special attention will be paid to the tires and all flat surfaces. (Tarps will not be washed as they are rolled up tight during the loading cycle and would not be exposed to fugitives.)
- 3) New haulage trucks with sealed hard tops will start arriving on the sea lift soon. Two trucks arrive in July, four trucks in August and the remainder in September. Usage of the new trucks will commence by mid-August with usage of the old trucks anticipated to end by mid-September. New units will go through the same wash and vacuuming cycles as the current units.

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- 4) A stilling curtain will be designed and installed by Cominco Alaska at the port to address fugitives which might otherwise escape outside the dump bin area in the TUB.
- 5) All use of air lancing to aid concentrate discharge from concentrate trucks will be stopped immediately.

Studies will immediately be implemented on:

- 1) Paving the port road, load out access and dump accesses.
- 2) Installing fully automated concentrate truck cleaning facilities at port and mine.
- 3) Ways of reducing the need to open the doors to CSBs, reducing the time period the doors are open, and otherwise eliminating the risk of fugitive emissions from the CSBs.
  - 4) Additional road binder studies.

Please understand that these are steps being taken by Cominco Alaska to immediately address the risk of fugitive emissions relating to the trucks. Cominco Alaska will work cooperatively with ADEC and other interested agencies and parties in evaluating further the data presented in the NPS fugitives study and in identifying the appropriate response. Cominco Alaska takes very seriously any concerns there are environmental or health risks associated with its operations.

Sincerely,

COMINCO ALASKA INCORPORATED

By:

John Key, General Mariager Red Dog Operations

cc: Honorable Governor Tony Knowles Michele Brown, Commission-ADEC Charlie Curtis, NANA