From:	Jones, Dave F (DEC)
To:	Kevin Lewis; Fernandez, Enric
Cc:	Graham, Dan; Ejaz Memon; Plosay, James R (DEC); Renovatio, James J (DEC); Germain, Grace (DEC)
Subject:	RE: Draft Preliminary Construction Permit AQ0934CPT02 for the Donlin Gold Project
Date:	Tuesday, October 4, 2022 11:20:00 AM
Attachments:	image001.png image002.png

Kevin,

After further review, the Department has determined that SPC VI (Good Air Pollution Control Practices) was carried over from Donlin's original construction permit and is not required to be included in this permitting action under 18 AAC 50.346. We have not included SPC VI in the most recent three PSD construction permits that have been issued. Therefore, we propose removing SPC VI from the draft permit. However, we will note that this condition will be included when Donlin applies for a Title V Operating permit.

To answer your two questions below for when the time comes to determine which EUs are applicable to SPC VI:

1. Yes, we still use the thresholds from 18 AAC 50.326(d)-(i) even when dealing with Title I permits.
2. Yes, the exclusion for EUs that have robust monitoring similar to SPC VI can include EUs subject to the fugitive dust control plan, as well as BACT conditions. I would suggest Donlin makes the case for which EUs fall under Exclusion 2 when they apply for their TVP.

Regards,

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

From: Kevin Lewis <klewis@airsci.com>
Sent: Tuesday, October 4, 2022 8:54 AM
To: Jones, Dave F (DEC) <dave.jones2@alaska.gov>; Fernandez, Enric <efernandez@donlingold.com>
Cc: Graham, Dan <dgraham@donlingold.com>; Ejaz Memon <ememon@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>
Subject: RE: Draft Preliminary Construction Permit AQ0934CPT02 for the Donlin Gold Project

Hi David,

Hi David,

Enric and I are working on the SPC VI list. We are going through the list of EUs and excluding the following:

1. EUs that are insignificant and do not use a control device.
2. EUs subject to 40 CRF 60, 61, or 63

A couple of questions:

1. Do we look to 18 AAC 50.326(d)-(i) for the determination of which EUs are insignificant, even though this is a Title V operating permit regulation?
2. For the mining fugitive EUs that are monitored and controlled by the Fugitive Dust Control Plan, should these be excluded as they were in the original permit, and was the basis for the exclusion per Item 2 of the SPC VI guidance, attached?

Thanks, Kevin

KEVIN LEWIS

Principal Air Quality Engineer, Chemical Engineer ¦ Air Sciences Inc.
150 Capital Drive, Suite 320 ¦ Golden, CO 80401
(P) 720·389·4213 ¦ (F) 303·988·2968 ¦ (C) 303·638·2892
klewis@airsci.com ¦ www.airsci.com

From: Jones, Dave F (DEC) <dave.jones2@alaska.gov>
Sent: Friday, September 30, 2022 17:53
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

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[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:

My files > Data xfer > **20220929 ADEC Air Permit Tech Review**

Name	Modified	Modified By	File size	Sharing
AQ0934CPT02 Draft Preliminary Modeling Review 09.15.22-Comme...	29 minutes ago	Fernandez, Enric	311 KB	Shared
AQ0934CPT02 Draft Preliminary Permit 09.15.22-DG Comments.docx	35 minutes ago	Fernandez, Enric	27.5 MB	Shared
DG Access Control Plan-2022.pdf	27 minutes ago	Fernandez, Enric	2.27 MB	Shared
DG Public Easement Plan (Jan. 2022 Rev. 09).pdf	A few seconds ago	Fernandez, Enric	3.65 MB	Shared

- 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

Enric Fernandez| Permitting and Environmental Manager | Donlin Gold LLC
2525 C Street, Suite 450 Anchorage, Alaska 99503
Cell: (907) 980-2930
Email: efernandez@donlingold.com

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