



ALASKA MINERS ASSOCIATION, INC.

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October 5, 2004

Mr. Don Bodron
Environmental Engineering Associate
Alaska Department of Environmental Conservation
Air Quality Division
410 Willoughby Avenue
Juneau, Alaska 99801

FAX 907-465-5129

RE: Air Permit Program - Proposed Fixed Fee Program

Dear Mr. Bodron,

The Alaska Miners Association (AMA) is a non profit membership organization representing the mining industry. The AMA is composed of individual prospectors, geologists and engineers, vendors, small family mines, junior mining companies, and major mining companies. Our members look for and produce gold, silver, platinum, diamonds, lead, zinc, copper, coal, limestone, sand and gravel, crushed stone, armor rock, etc. Our members live and operate in all parts of Alaska and their operations are subject to the air quality requirements of these subject regulations. Thank you for the opportunity to comment on the proposed fixed fees regulations that are being proposed under the air permits program.

Section 18 AAC 50.400(i)(2),(4)and(5). Flat fees should be established for permit modifications for minor sources.

Section 18 AAC 50.401(5). As written, 18 AAC 50.401(5) appears to require that all permittees, owners, or operators of a stationary source applying for a permit in the Cook Inlet area obtain permits under the negotiated service agreement (NSA). It is our understanding that the Cook Inlet area discussed in this section applies only to offshore platforms in the Cook Inlet. If this is the case, the language should be amended by adding the words "offshore platforms located" prior to the phrase "in Cook Inlet" to accurately define which facilities must obtain a permit under a NSA. Without this change, every minor source located in the vicinity of the Cook Inlet, both offshore and onshore, could potentially be required to unnecessarily obtain permits under a NSA. It is certain that groups opposing any industrial activity in the area would make such an argument in court.

Thank you for the opportunity to comment on the proposed changes to 18 AAC 50. We believe the proposed changes will help streamline the permitting process and provide our members with a more dependable and less complex means of planning for permitting costs as they develop new projects in the State of Alaska.

Sincerely,

Steven C. Borell, P.E.
Executive Director