From:	Syed, Rizwan
To:	Jones, Dave F (DEC)
Subject:	RE: Draft Preliminary Construction Permit AQ0934CPT02 for the Donlin Gold Project
Date:	Wednesday, January 11, 2023 12:11:06 PM
Attachments:	image001.png image002.png 01-11-2023- r10 comments to ADEC for Donlin Gold PSD permit.pdf

Mr. Jones,

EPA Region 10 is submitting comments to Alaska DEC on the draft PSD construction permit to Donlin Gold, LLC (AQ0934CPT02). See attachment for the comments. Please contact me if you have any questions or would like to discuss the comments

Rizwan Syed, Permit Writer
Air Permits & Toxic Branch, Air & Radiation Division
Region 10 U.S.EPA
1200 Sixth Avenue
Seattle, WA 98101
(206) 553-6345 (desk)
(217) 414-8983 (cell)
(He/Him/His)

From: Jones, Dave F (DEC) <dave.jones2@alaska.gov>
Sent: Monday, December 12, 2022 3:22 PM
To: Syed, Rizwan <Syed.Rizwan@epa.gov>
Cc: Meyer, Dan <Meyer.Dan@epa.gov>; Plosay, James R (DEC) <jim.plosay@alaska.gov>; Renovatio, James J (DEC) <james.renovatio@alaska.gov>
Subject: RE: Draft Preliminary Construction Permit AQ0934CPT02 for the Donlin Gold Project

Rizwan,

Thanks for reaching out regarding the Donlin Gold Project preliminary construction permit review. As we discussed over the phone, the Department is going to move forward with public noticing the preliminary construction permit this afternoon and we will anticipate receiving comments from EPA Region 10 during the next 30 days. The Department will respond to any comments received by EPA Region 10 during the public notice period and we will be in touch prior to finalizing the permit if we have any questions regarding your comments or see any areas as contentious.

Regards,

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

From: Syed, Rizwan <Syed.Rizwan@epa.gov>
Sent: Monday, December 12, 2022 12:48 PM
To: Jones, Dave F (DEC) <dave.jones2@alaska.gov>
Cc: Meyer, Dan <Meyer.Dan@epa.gov>
Subject: RE: Draft Preliminary Construction Permit AQ0934CPT02 for the Donlin Gold Project

Hi Dave, just wanted to share with you that Region 10 may have some comments on the pre-draft. I know that you had planned to go for public comment tentatively this week. If the notice can be held for some time that way it will give you a chance to include them before the notice, rather than get them during the comment period. Please let me know if you have

any questions.

Rizwan Syed, Permit Writer
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From: Jones, Dave F (DEC) <dave.jones2@alaska.gov>
Sent: Tuesday, October 11, 2022 10:37 AM
To: Syed, Rizwan <Syed.Rizwan@epa.gov>
Subject: RE: Draft Preliminary Construction Permit AQ0934CPT02 for the Donlin Gold Project

Rizwan,

There won't be very many changes so it is really up to you. Also, the version that you and the FLMs will get for the pre-review will be the version that goes out to public notice unless there is a substantial issue that you or the FLMs have with the preliminary permit. Otherwise, we would just expect EPA and the FLMs to submit comments during the comment period, so this more or less means the FLMs and EPA have a 60-day comment period.

The biggest change we are making based on Donlin's preliminary technical review was increasing the hours that their primary power generation diesel EUs 1 -12 are allowed to operate without full SCR and Ox Cat controls in operation. We are allowing each diesel engine to start-up once per day (it takes 30 minutes for the pollution control devices to reach full abatement from a cold start) which Donlin said they would need after talking with their vendor. The previous construction permit AQ0934CPT01 did not have any limit on this amount of time.

Regards,

Dave Jones
Environmental Engineering Associate I
ADEC – Air Quality – Juneau
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907.465.5122

From: Syed, Rizwan <Syed.Rizwan@epa.gov>
Sent: Tuesday, October 11, 2022 5:05 AM
To: Jones, Dave F (DEC) <dave.jones2@alaska.gov>
Subject: RE: Draft Preliminary Construction Permit AQ0934CPT02 for the Donlin Gold Project

Do you want me to wait on it still till we get the draft by the end of this week before I start the review of the TAR and also re-check on the draft permit

Rizwan Syed, Permit Writer
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From: Jones, Dave F (DEC) <dave.jones2@alaska.gov>

Sent: Monday, October 10, 2022 5:18 PM
To: Syed, Rizwan <Syed.Rizwan@epa.gov>
Subject: FW: Draft Preliminary Construction Permit AQ0934CPT02 for the Donlin Gold Project

Rizwan,

Donlin sent us their marked up technical analysis report (TAR) last week when I was out on leave. It is also up on our website: https://dec.alaska.gov/air/air-permit/donlin-mine-application. I anticipate that this preliminary permit will be getting sent to the EPA and federal land managers for a 30-day pre-public comment review by the end of the week.

Regards,

Dave Jones
Environmental Engineering Associate I
ADEC – Air Quality – Juneau
dave.jones2@alaska.gov
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From: Fernandez, Enric <efernandez@DonlinGold.com>
Sent: Wednesday, October 5, 2022 5:08 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>; 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

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

Enric Fernandez| Permitting and Environmental Manager | Donlin Gold LLC
2525 C Street, Suite 450 Anchorage, Alaska 99503
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Email: efernandez@donlingold.com

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
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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
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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
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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