From:	Jones, Dave F (DEC)
To:	Stacy, Andrea; Collins, Catherine
Cc:	Allen, Tim; Blakesley, Andrea J; Shepherd, Don; King, Kirsten L; Paul Burger; r10_air_permits@epa.gov; Simpson, Aaron J (DEC); James R Plosay (DEC) (jim.plosay@alaska.gov); Crutchfield, Brittany M (DEC); Renovatio, James J (DEC)
Subject:	Donlin Gold LLC, Donlin Gold Project PSD Construction Permit Application & 3rd PSD Construction Extension Request
Date:	Tuesday, November 23, 2021 2:38:00 PM
Attachments:	AQ0934CPT02A Application 10.29. 21..pdf Email Submission 10.29.21.pdf AQ0934CPT01 DG PSD Permit 3rd Extension Request F00.pdf

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Andrea and Catherine,

Under 40 C.F.R. 52.21(p), the Alaska Department of Environmental Conservation (Department) is providing notice to FLM stakeholders that Donlin Gold LLC (Donlin) has submitted a new Prevention of Significant Deterioration (PSD) construction permit application (AQ0934CPT02, attached) for the proposed Donlin Gold Project (Project): an open pit, hard rock gold mine in southwest Alaska.

The Project was issued PSD Construction Permit AQ0934CPT01 on June 30, 2017, and went through the Best Available Control Technology (BACT) process for NOx, CO, PM, PM-10, PM-2.5, VOC, and GHG. The Department issued an 18-month PSD extension approval letter on October 12, 2018, and a second PSD permit extension approval letter on May 15, 2020, which required construction commence no later than December 30, 2021. The new application for Construction Permit AQ0934CPT02 includes a third PSD extension approval request (attached) to cover operations from December 30, 2021 until the Department issues the new PSD construction permit.

Regarding Class I Areas:
The Project is located more than 300 km from Denali National Park to the northeast and more than 350 km to Tuxedni National Wildlife Area to the southeast. Note, that PDF page 556 of the application for Construction Permit AQ0934CPT02 states, “The National Park Service has confirmed that no analysis is required for this [Denali N.P.] Class I area (Notar 2013).” Therefore, it appears the Permittee has not included any Q/d calculations specific to Class I areas.

Regarding Modeling Files:
PDF page 614 of the application includes a link to download an electronic version of the modeling files used for ambient air quality demonstrations.

Regarding Emissions and BACT:
The application includes the same twelve 17 MW diesel-fired Wartsila engine generators with selective catalytic reduction and oxidation catalysts firing ULSD and natural gas that were included in the previous permit. the Best Available Control Technology (BACT) section begins on PDF page 231 and includes an analysis for CO, NOx, PM, PM-10, PM-2.5, VOC, and GHG. The facility wide potential to emit is estimated at 1,256 tpy for CO, 1,230 tpy for NOx, 693 tpy for PM, 660 tpy for PM-10, 643 tpy for PM-2.5, 23 tpy for SO_2, and 1,726,426 tpy for GHG.

The Department has created a webpage to inform the public about the PSD construction permit application and the third PSD extension approval request; https://dec.alaska.gov/air/air-

permit/donlin-mine-application. Any additional material received from the Permittee or material produced by the Department related to the preliminary construction permit or the PSD extension approval request will be published on this website.

The Department will proceed with its review of the permit application with the understanding that the FLMs will not be requesting a PSD Class I analysis, unless the Department receives a response indicating otherwise, received before close of business on Friday January 7, 2021.

As was previously agreed upon between the Department and the FLMs, we will provide a draft of the preliminary permit to the FLMs and EPA for review 30 days prior to public notice.

Feel free to contact either myself, or James Renovatio (cc'd) who is performing the modeling review for the project with any questions or concerns.

Regards,

Dave Jones
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