

**Teck Alaska Incorporated**  
**Comments on the Red Dog Mine Preliminary Permits**  
**AQ0290TVP03 Revision 3 and associated Statement of Basis**

Teck Alaska Incorporated (Teck) appreciates the Alaska Department of Environmental Conservation (ADEC) Division of Air Quality completing an integrated review of the Title V permit and Title I permit. Teck is submitting the below comments within the public comment period which ends on January 30, 2023. Please note that the bases presented in the table below are intended to describe and supplement the edits made in the associated red-line strike-out (RLSO) versions of the Red Dog Mine Draft Permit No. AQ0290TVP03 Rev. 3 included with the comments as Attachment I. In addition to the below comments, the RLSO permit includes minor typographical or grammatical corrections (for example: Condition 8 lists PRC-1 through PRC-11 instead of PRC-1~~a~~ through PRC-11~~a~~).

No.	Location in Permit or Statement of Basis (original condition numbers are listed unless noted otherwise)	Basis of the Request Detailed in the RLSO version of the permit, included as Attachment I (Title V Operating Permit and Statement of Basis)
<b>Preliminary Title V Operating Permit AQ0290TVP03, Rev. 3</b>		
<b>Section 2 Emission Unit Inventory and Description</b>		
1	Table A MXG-101	<p>MXG-101 engine was also replaced with the new crushing equipment. The nonroad engine associated with the portable rock crusher is:</p> <p>Type Sequence Number: 94-107  Emission Unit Description: Cummins QSK23  Rating: 800kW  Installation Date: 2022</p> <p>ADEC currently has this engine listed as PRC-2. Teck recommends identifying the PRC engine as MGX-101<del>a</del>. Please update the requirements applicable to MXG-101 to the replacement engine.</p>
<b>Section 3 State Requirements</b>		
2	Condition 3.6c(ii)	<p>The standard permit condition language contained in Condition 3.6 is applicable to emission units that have exhaust stacks and assumes a Method 9 observation is possible. MF-1 is a vent and does not have an exhaust stack; therefore, a Method 9 observation as corrective action is not feasible.</p> <p>Teck is requesting a modification to Standard Permit Condition IX to account for this stationary source specific situation.</p>
3	Condition 8.2	Condition 8.2 does not apply to MG-29. Please delete the typographical error on line 7. MG-29 was removed from the first line of the permit condition but not in the language later in the condition.
4	Condition 9.1g	This condition is referring to the Asphalt Plant, as noted in the last sentence of this condition. Please replace the term "Permittee" with "Asphalt Plant" in the two instances in the first sentence of this condition.

<b>No.</b>	<b>Location in Permit or Statement of Basis</b> (original condition numbers are listed unless noted otherwise)	<b>Basis of the Request Detailed in the RLSO version of the permit, included as Attachment I (Title V Operating Permit and Statement of Basis)</b>
5	Citation to Condition 24.3 through 24.7	Please delete the reference citation for Condition 14 of Minor Permit AQ0290MSS06, Rev. 1. Condition 14 of Minor Permit AQ0290MSS06, Rev. 1. is a reference to the Certification requirements under the General Recordkeeping, Reporting, and Compliance Certification Requirements of that permit. Conditions 24.3 through Conditions 24.7 do not require a certification statement.
6	Condition 30	Update the language to include reference to EU ID MG-1, MG-2, MG-4 through MG-6, and MG-18 that are included under Table D.

No.	Location in Permit or Statement of Basis (original condition numbers are listed unless noted otherwise)	Basis of the Request Detailed in the RLSO version of the permit, included as Attachment I (Title V Operating Permit and Statement of Basis)
7	Condition 59, 59.1, 59.2, 59.3	<p>Delete these conditions in their entirety because the incinerators at the Red Dog Mine are not subject to 40 CFR 60 Subpart O.</p> <p>Under 40 CFR 60.150, an incinerator that is constructed after June 11, 1993, is applicable under Subpart O if it combusts waste containing more than 10 percent sewage sludge (dry basis) <b><i>produced by municipal sewage treatment plants</i></b>, or each incinerator that charges more than 1000 kg (2205 lb) per day municipal sewage sludge (dry basis). The incinerators at Teck do not combust waste produced by municipal sewage treatment plants. Furthermore, the incinerators are not capable of charging more than 1000 kg (2205 lb) per day.</p> <p>Teck contends that the Red Dog Mine does not combust waste containing sludge produced by municipal sewage treatment plants under Subpart O. Any terms under Subpart O are defined under Subpart A of Part 60 or the Clean Air Act. The term “municipal sewage treatment plant” is not defined under Subpart A or the Act. Therefore, Teck must rely on other resources to define the meaning of this term from publicly available sources.</p> <p>In the June 11, 1973 Federal Register, sewage sludge is defined as the waste byproduct of municipal sewage <u>treatment process</u>, including any solids removed in any unit operations of such treatment process.</p> <p>A sewage treatment process can include up to seven stages but is typically divided into three stages: primary, secondary, and tertiary water treatment. Primary treatment includes mechanical separation of solids. Secondary sewage treatment includes degradation of biological content of the waste through aerobic biological processes. Tertiary treatment includes further treatment to improve the water quality to meet domestic and industrial standards for water discharge safety.</p> <p>Teck engages in a primary treatment process where only solids are removed for incineration. No secondary or tertiary treatment of the sludge occurs and therefore, the Red Dog Mine does not have a sewage <u>treatment process</u> as described under Subpart O. Since Teck does not operate a sewage treatment process, Teck cannot have a sewage treatment plant at the Red Dog Mine, making Subpart O not applicable.</p>
<b>Statement of Basis for the Terms and Conditions of Preliminary Permit No. AQ0290TVP03, Rev. 3</b>		
<b>Air Quality Permits, Title I (Construction and Minor) Permits</b>		
8	Minor Permit AQ0290MSS07	The description for AQ0290MSS07 should include details that indicate this permit is no longer incorporated into the Title V or that all requirements pertaining to this permit have been removed from the Title V, since the emission unit that this permit authorizes has been removed from service (MG-26).

