

ATTACHMENT I

Teck Alaska's requested revisions to DeLong Mountain Regional Transportation System Port Facility (DMTS Port Facility) Preliminary Permit No. AQ0289TVP04 for the public comment period that ends February 18, 2023

No.	Location in Permit or Statement of Basis (original condition numbers are listed unless noted otherwise)	Basis of the Request
Preliminary Title V Operating Permit AQ0289TVP04		
1	Table A - Emissions Unit Inventory	Please update the emissions unit inventory and related conditions throughout the permit as indicated under Table 1 of these comments for consistency to reflect the nomenclature used under AQ0289TVP03, Revision 3. The Portable Rock Crushing inventory presented in Table 1 is reflective of the replaced portable rock crusher installed in 2022 that is used at the DMTS Port Facility, Red Dog Mine Facility, and DMTS road. Teck requests that all permits reference the equipment in the same way to reduce confusion.
2	Condition 26.2	Revise referenced conditions to ascending order for clarity. <i>"...the requirements described by Conditions 27, 72 31, 72, and 31 72.1."</i>
3	Condition 36	Please include a space to correct a grammatical error. <i>"...conduct source tests according to <u>40 CFR 60.8 and Section 6...</u>"</i>
4	Condition 48.1	Please update the condition to include a new footnote reference and include a related footnote demonstrating compliance with the underlying limit of Subpart E. <i>"40 CFR 61 Subpart E Emission Standards. The Permittee shall not cause or allow the emissions to the atmosphere from EU ID 7 to exceed 3.2 kg (7.1 lb) of mercury per 24-hour period¹⁴."</i> <i>"¹⁴ <u>Mercury testing completed on May 10, 2018 demonstrated that the mercury emissions from EU ID 7 are 0.00005 pounds per 24-hour period.</u>"</i>
5	Condition 48.4	Please update the condition to accurately reflect the requirements by which additional monitoring of emissions and operations are required under Subpart E. <i>"Monitoring of emissions and operations. <u>If changes are made to the operation of the plant as allowed under Condition 48.2 and the new test results demonstrate that the</u> All the sources for which mercury emissions exceed 1.6 kg (3.5 lb) per 24-hour period, demonstrated either by stack sampling according to 40 CFR 61.53 or sludge sampling according to 40 CFR 61.54, <u>the Permittee shall monitor mercury emissions at intervals of at least once per year...</u>"</i>
6	Condition 51.3b	Please delete this condition. Teck is requesting that EU ID 5 be reclassified as non-emergency.
7	Condition 52.1.a	Please revise this conditon to include the proper citation for EU IDs 1 through 4. <i>[40 CFR 63.6603 (a) (b)(1), & Table 2d, Item 1 & Footnote 1, Subpart ZZZZ]</i>
8	Condition 52.1.b	Please revise the condition as follows to indicate EU ID 5 is reclassified as a non-emergency engine. Please revise the citation to the condition as follows to reflect the correct requirement for the engine category. <i>"For EU ID 5 (existing <u>non-</u> emergency¹⁷ stationary CI RICE ≤ 300 hp):</i> <i>(i) Change oil and filter every 500 1,000 hours of operation or annually, whichever comes first, except as allowed by Condition 52.2;</i> <i>(ii) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and</i> <i>(iii) Inspect all hoses and belts every 500 1,000 hours of operation or annually, whichever comes first, and replace as necessary.</i> <i>[Table 2d, Item <u>4 1</u> & Footnote 1, Subpart ZZZZ]"</i>
9	Condition 53 through 53.3	Please delete these conditions to reflect EU ID 5 is reclassified as a non-emergency engine.

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10	Condition 54.1	<p>Please include a space to correct a grammatical error.</p> <p>"You must keep records of the maintenance conducted on EU IDs 1_through 5 in order to demonstrate..."</p>