UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

JAN 08 2014

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Ms. Melissa Barbanell
Director, Environmental Sustainability
Barrick Gold Corporation
136 East South Temple, Suite 1800
Salt Lake City, Utah 84111

Dear Ms. Barbanell:

I am writing in partial response to your letter of March 4, 2011, to Mr. Chuck French of the Sector Policies and Programs Division here in the Environmental Protection Agency's (EPA) Office of Air Quality Planning and Standards requesting clarification/confirmation or rule revision regarding a number of rule elements in 40 CFR 63, Subpart EEEEEEE, National Emissions Standards for Hazardous Air Pollutants from Gold Mine Ore Processing and Production Area Source Category (Subpart EEEEEEE). In particular, regarding Item 6 in your letter in which you propose a rule revision to handle a restrictive performance testing requirement that may be more expeditiously handled under the Administrator's authority in §63.7(f) allowing requests for approval of alternatives/modifications to test methods and testing procedures. Thus, we are considering that portion of your letter as such a request.

Under Item 6 in your letter, you note that Subpart EEEEEEE specifies the use of Method 29 (40 CFR 60, Appendix A) for conducting compliance testing for mercury, and that Subpart EEEEEEE requires that a minimum sample volume of 30 dscf be collected during each Method 29 test run. We also understand from your letter that historically, state permits regulating the gold production industry have allowed for either a minimum sample volume of 60 dscf or a total sampling time of 2 hours. While we typically specify a minimum sample volume (as opposed to a minimum sampling time) in our rules to ensure that the sample collected -- even if it yields a non-detect result -- will be adequate to allow determination of compliance, we now understand that collection of 30 dscf of sample volume may take more than 2 hours for certain gold production emission sources. In particular, the high moisture levels in the exhaust of the autoclaves would likely result in collection of only 16 to 20 dscf of sample volume over a 2-hour collection period.

Given that (1) section 63.11646(a)(2) of the rule requires that the minimum detection limit must be used to calculate the mass emissions rate when a sample yields a non-detect result, and (2) a 2-hour sampling time should result in adequate sample from autoclaves where such an option would most likely be used, we hereby approve the use of a 2-hour minimum sampling time as an alternative to the 30 dscf minimum sample volume requirement when Method 29 is applied under Subpart EEEEEEE. Since this approval is applicable to all gold production facilities subject to Subpart EEEEEEE, we will be posting this letter on our website at http://www.epa.gov/ttn/emc/approalt.html for use by other interested parties.

If you have any questions or require further information regarding this approval, you may contact me at 919-541-0893.

Sincerely,

Robin R. Segall

Robin R. Segall, Acting Group Leader
Measurement Technology Group

cc: Rob Bamford, Neveda Division of Environmental Protection
Chuck French, EPA/OAQPS/SPPD
John Kutterbach, Alaska Department of Environmental Conservation
Steffan Johnson, EPA/OAQPS/SPPD
Scott Throwe, EPA/OECA/OC/MAMPD