



Fairbanks North Star Borough

DEPARTMENT OF THE ASSEMBLY
Division of Boards and Commissions

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August 4, 2022

Mayor Bryce Ward
907 Terminal Street
Fairbanks, AK 99701

Re: Air Quality Impacts and Possible Mitigation Measures in the FNSB PM2.5 Non-Attainment Area Regarding the Proposed Kinross Gold Corporation's Ore-Hauling Plans from the Manh Choh Mine in Tetlin to the Fort Knox Mine near Fairbanks

Dear Mayor Ward,

The Fairbanks North Star Borough Air Pollution Control Commission (APCC) held a publicly noticed meeting on August 3, 2022, in the FNSB Mona Lisa Drexler Assembly Chambers. Potential air quality impacts to the FNSB PM2.5 non-attainment area that could result from the proposed ore-hauling operation by Kinross Gold Corporation (Kinross) from the Manh Choh gold mine near Tetlin, Alaska was an agenda item for this meeting. The APCC received public testimony from several FNSB residents, various other interested parties, and government agencies with an interest in this issue. The APCC discussed the potential air quality impacts on the ability of the FNSB to attain compliance with the mitigation of the current USEPA Serious State Implementation Plan (SIP) classification. As you are aware, failure to attain compliance with the PM2.5 air quality standards could result in severe Federal sanctions including restrictions on commercial and industrial activities in the non-compliant airshed, as well as possible reductions in federal highway funding for the FNSB and the State of Alaska.

From the limited information that has been provided by Kinross, it appears that the proposed ore-hauling project may involve as many as 192 tractors hauling 80-ton loads of ore per day between Tetlin and Fairbanks, and possibly as many as 384 more tractors per day hauling half size loads between Fairbanks and the Fort Knox Mine from a load transfer station. This would purportedly occur 365 days per year regardless of the air quality status in the Fairbanks non-attainment area. The APCC strongly recommends that the FNSB seek a definitive proposal from Kinross that details the nature of the proposed



hauling plan, the mechanics of the transfer operation between vehicles including the location of the transfer staging facility, the type of engines that will be used on the tractors, and a thorough analysis and quantification of the nature and magnitude of the resulting projected PM2.5 actual and precursor emissions. This data will be needed by the FNSB and the Alaska Department of Environmental Conservation (ADEC) to properly update the PM2.5 SIP and associated mitigation measures to determine the impact on the non-attainment area.

The APCC further recommends that the FNSB engage in a dialogue with Kinross regarding measures that could mediate the possible air quality impacts including:

- Locating the load transfer station outside of the PM2.5 non-attainment area.
- Using only the lowest emission diesel engines (Tier 4) on diesel-powered tractors transiting the non-attainment area.
- Consider the use of CNG-powered rather than diesel-powered tractors for loads transiting the non-attainment area.
- Evaluate the use of alternate routes for the ore hauling traffic that could reduce the impact on air quality and traffic flow within the core area of the city.
- Consider possible offsets for the potential air quality impacts of this operation such as providing additional funding for solid-fuel appliance to natural gas conversions within the non-attainment area.

The APCC recommends that any data and information pertaining to the potential air quality impacts are provided to the Fairbanks Area Surface Transportation Planning group for consideration in the 2020-2022 Air Quality Conformance Analysis. The APCC also recommends the FNSB Assembly and residents of the FNSB, and ADEC be fully appraised of any information received from Kinross, and the results of any negotiations and communications between the FNSB and Kinross that may alter the PM2.5 conditions within the non-attainment area.

Sincerely,

Michael Pollen

Michael R. Pollen, Chair
Air Pollution Control Commission