




Memorandum

Date: December 29, 2021

To: Humboldt Smelter Project File
Site Code: 513826-00
RIMS: 800049

Thru: Karin Harker, Federal Projects Unit (FPU) Manager

From: Joey Pace, FPU Project Manager. 

Subject: Humboldt Smelter Project: Air Quality Levels for Smelter Takedown

The following represents the values at which the Arizona Department of Environmental Quality (ADEQ) will advise onsite contractors to cease work and re-evaluate work protocols in order to avoid exceeding the National Ambient Air Quality Standards (NAAQS) for Particulate Matter (PM) established under the Clean Air Act during smelter structure dismantling.

The values provided below were established for the PM monitoring of particulates less than or equal to 2.5 microns and particulates less than or equal to 10 microns. All values below are provided in micrograms per cubic meter ($\mu\text{g}/\text{m}^3$).

- Work will be halted if PM2.5:
 - Exceeds the 1-hour average Alert Level of 150 $\mu\text{g}/\text{m}^3$
 - Exceeds the 24-hour average NAAQS level of 35 $\mu\text{g}/\text{m}^3$

- Work will be halted if PM10:
 - Exceeds the 1-hour average Alert Level of 800 $\mu\text{g}/\text{m}^3$
 - Exceeds the 24-hour average NAAQS level of 150 $\mu\text{g}/\text{m}^3$.

As indicated in the December 17, 2021 *Humboldt Smelter Project Work Plan*, ADEQ will monitor for the presence of PM2.5 and PM10 and contractors will take mitigating actions if alerted of a potential exceedance, such as increased water application, should dust be observed emanating from the takedown activities.

As indicated in the work plan, **NO VISIBLE DUST IS ALLOWED.** As long as this precautionary measure is adhered to, no exceedances of the NAAQS and/or Alert Levels would be anticipated.