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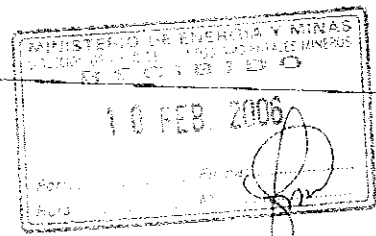
TO: Ing. Julio Bonelli

COMPANY: Ministerio De Energia Y Minas

FAX: 51-1-475-7712 anexo 2471

SENT BY: Penny Cottasfeld

NOTES:





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February 8, 2006

Mr. Glodomiro Sánchez Mejía
 Minister
 Ministry of Energy and Mines
 Av. Las Artes 260 – San Borja
 Republic of Peru

At: Ing. Julio Bonelli, Director de Asuntos Ambientales Mineros

Dear Minister Sánchez,

I am contacting you regarding the SOLICITUD DE PRORROGA EXCEPCIONAL DEL PLAZO DE CUMPLIMIENTO PARA EL PROYECTO PLANTAS DE ACIDO SULFURICO (PAMA extension application) for the Doe Run smelter operations in La Oroya.

Our review of the available information indicates that significant exposures are occurring from ongoing smokestack emissions from Doe Run's smelter operations. These emissions are contributing to the lead body burden seen in recent blood lead levels, and are also adding to the existing soil and dust contamination which will remain a significant source of exposure into the future.

Our comments are limited to two specific issues from the documents submitted by Doe Run for this application. First, we reviewed the estimated fugitive lead emissions from the operations and how these were incorporated in the dispersion model used as the basis for the lead risk assessment and proposed emission reduction targets. Secondly, we compared the proposed emission reductions for heavy metals from 2005 to 2011 in La Oroya to Doe Run's actual heavy metal emissions at its smelter in Herculaneum, Missouri. An additional comparison was also made to all of Doe Run's lead smelters in Missouri. Our review did not look at plans for the Sulfuric Acid Plant nor did we attempt to assess the quality of the Lead Risk Assessment report prepared by Integral Consulting.

Estimated Fugitive Emissions 2002 and 2011

The data provided by Doe Run (Appendix B to the Mc Vehil-Monnell report, 2005) was the basis for the dispersion model provided by Mc Vehil in the report dated September 6, 2005. Doe Run provided a specific list of fugitive emission sources for this purpose in the Appendix. Table 1 compares the fugitive emissions provided by Doe Run and the values apparently used in the dispersion model. Apparently, due to errors and/or omissions, the dispersion model (from Table 7-1) failed to account for 28 MT per year (approximately seven percent less) from fugitive emission estimates provided for 2002. In addition, they under estimate the anticipated fugitive emissions for 2011 by 2 MT per year. The Mc Vehil report (2005) does not appear to include the estimated fugitive

emissions provided for Casting Anodes, Slimes Plant, Zinc Roaster, and the Lead Electrolytic units for 2002.

The fugitive emissions estimates provided in the PAMA extension application submitted by Doe Run (2005), further reduced estimated fugitive emissions from the Mc Vehil Dispersion Model (2005) by 16 MT per year for 2011 (see Table 2). In sum the estimates of fugitive emissions for 2011 were reduced by 30 percent from the figures initially provided by Doe Run in June 2005 to what they have submitted in the current application. We were unable to locate any explanation for the reduction in estimated emissions in these reports. Therefore this discrepancy questions the validity of the dispersion modeling provided and the resulting lead risk assessment which relied upon the Mc Vehil report as its basis for calculating exposures. The large differences in estimates of fugitive emissions for 2011 raise questions about claims in the PAMA extension application for achieving ambient air standard objectives for lead, cadmium and arsenic.

Proposed Emissions vs. Reported Emissions in Herculaneum

The Doe Run PAMA extension application provides specific emission targets for heavy metals during the period from 2005 to 2011. Table 3 provides a comparison of the proposed emission limits for the La Oroya site and the reported emissions from 2003 (the most current year available) for the Herculaneum, Missouri smelter operated by Doe Run. The Herculaneum smelter is the largest single source of lead emissions in the United States according to the Toxic Release Inventory (TRI) compiled by the U.S. Environmental Protection Agency (EPA).

The proposed lead emissions (fugitive and stack combined) for La Oroya are 11 times the reported emissions from the Herculaneum site. The levels for arsenic are 1,245 times greater and for cadmium are 19 times greater. Given possible differences in production capacity, we then compared the anticipated emissions for La Oroya to the total emissions reported for all three Doe Run smelters in Missouri. Again, the comparison in Table 4 shows that Doe Run is still planning to emit 6 times more lead, 642 times more arsenic, and 10 times more cadmium in La Oroya in 2011 than they are currently releasing in all three Missouri locations combined.

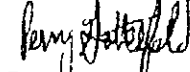
Given that these estimated emission levels provided by Doe Run for La Oroya are claimed to allow the company to comply with ambient air regulations for lead, we can make a prediction based on their current performance in Herculaneum. This comparison is possible since the U.S. ambient airborne lead standard (1.5 $\mu\text{g}/\text{m}^3$) is the same as the Peruvian standard (Direto Supremo No 074-2001-PCM). Despite releasing more than ten times less lead into the environment, the Herculaneum plant has been unable to comply with the EPA ambient air standard for lead in three of the last four quarterly sampling periods in 2005 (Kim Olsen, U.S. E.P.A.).

Furthermore, the proposed lead emission levels for La Oroya in 2011 (0.6 MT/day) are 50 percent more than the current regulatory emission limit (in Missouri 10 CSR 10-

6.120) for lead stack emissions from the Doe Run Herculaneum site (0.4 MT/day). These comparisons suggest that the proposed PAMA emission levels will not be protective of public health even after the 2011 implementation targets are achieved.

I urge you to protect public health in La Oroya by not approving the extension for Doe Run's Environmental Management and Pollution Mitigation Agreement (PAMA) based on the available information provided. If you have any questions, you may contact me at okperry@gmail.com.

Sincerely,



Perry Gottesfeld
Executive Director

Table 1: Comparison of Doe Run Estimated Fugitive Emissions 2002 -2011 vs. McVehil Dispersion Model (MT/Year)

Sources Year	Doe Run (Appendix B)		Mc Vehil 2005		Difference	
	2002	2011	2002	2011	2002	2011
Sinter Plant scrubber	116	4	116	4	0	0
Sinter plant Fugitives	30	5	30	5	0	0
Blast furnace	60	10	60	10	0	0
dross plant	40	10	40	10	0	0
Casting Anodes	4	0	No data	No data	0	0
Slimes Plant	10	1	No data	No data	-4	0
Lead Electrolytic	4	1	No data	No data	-10	-1
Copper converter aisle	40	10	40	10	0	-1
Copper Roaster	60	15	60	15	0	0
(V) Zinc Roaster	10	0	No data	No data	0	0
Total	374	56	346	55	-28	-2

Mc Vehil Data Conversions

Spanish	English	Amount [g/s]		Amount [MT/Yr]	
		2002	2011	2002	2011
Lavadores de gases	Sinter plant scrubber	3.68	0.13	116	4
Planta de Aglomerado	Copper Roaster	1.9	0.48	60	15
Tubos vent. Tostador de Cobre	Cu converter aisle	1.27	0.32	40	10
Pasillo de convertidores de Cobre	Blast furnace	1.9	0.32	60	10
A'ito Horno	Sinter Plant fugitives	0.95	0.16	30	5
Planta Aglomeracion	Dross plant	1.27	0.32	40	10

Calculations

1 day = 86,400 seconds
 1 year = 365 days
 1 metric ton = 1,000,000 grams

Table 2: Comparison of McVehil Dispersion Model Estimated Fugitive Emission 2011 vs. DOE RUN PAMA Application Reported Estimates

	McVehil (2005)		DOE RUN PAMA (2005)		Difference
	2011		2011		2011
	Tons / Day	Tons / year	g/s	Tons / year	Tons / year
Scrubber de la planta de sinterizacion	0.13	4	0.011	4	0
Tostadores de Cobre	0.48	15	0.042	15	0
Pasillo de Convertidore de Cobre	0.32	10	0.028	10	0
Hornos de Plomo	0.32	10	0.002	1	9
Planta de espumaje	0.32	10	0.002	1	-9
Planta de sinterizacion	0.16	5	0.021	8	3
Total	1.73	54.6	0.106	39	-1.6

Calculations

- 1 year = 31,536,000 seconds
- 1 ton metric = 1,000,000 grams
- 1 year = 365 days
- 1 metric ton = 1,000 kilograms

Table 3: Comparison of Reported Air Emission from Doe Run's Herculesum, Missouri Site 2003 and Doe Run Peru La Oroya Proposed Emissions Levels for 2011

	DOE RUN PROPOSED 2011 PAMA STACK EMISSIONS (a)	DOE RUN PROPOSED 2011 PAMA FUGITIVE EMISSIONS (a)	DOE RUN HERCULANEUM 2003 STACK EMISSIONS (b)	DOE RUN HERCULANEUM 2003 FUGITIVE EMISSIONS (b)	PROPOSED STACK EMISSIONS X HERCULANEUM	PROPOSED FUGITIVE EMISSIONS X HERCULANEUM	TOTAL PROPOSED AIR EMISSIONS X HERCULANEUM (c)
Lead (lb/day)	482,807	88,515	40,569	9,658	12	5	11
Arsenic (lb/day)	241,404	48,683	228	5	1,059	9,737	1,245
Cadmium (lb/day)	16,094	2,53	332	112	19	20	19

Table 4: Comparison of Reported Air Emission from all Doe Run Missouri Smelter Locations 2003 and Doe Run Peru La Oroya Proposed Emissions Levels for 2011

	DOE RUN PROPOSED 2011 PAMA STACK EMISSIONS (a)	DOE RUN PROPOSED 2011 PAMA FUGITIVE EMISSIONS (a)	DOE RUN MISSOURI 2003 STACK EMISSIONS (b)	DOE RUN MISSOURI 2003 FUGITIVE EMISSIONS (b)	PROPOSED STACK EMISSIONS X DOE RUN MISSOURI	PROPOSED FUGITIVE AIR EMISSIONS X DOE RUN MISSOURI	TOTAL AIR EMISSIONS X MISSOURI (c)
Lead (lb/day)	482,807	88,315	55,477	39,760	5	7	6
Arsenic (lb/day)	241,404	48,683	302	150	799	325	642
Cadmium (lb/day)	16,094	2,53	1,146	736	14	3	10

Notes:
 (a) Doe Run Peru - Division La Oroya, Complexo Metalurgico La Oroya, SOLICITUD DE PRORROGA EXCEPCIONAL DEL PLAZO DE CUMPLIMIENTO PARA EL PROYECTO PLANTAS DE ACIDO SULFURICO, Diciembre 2005
 (b) U.S. EPA, Toxic Release Inventory, Missouri 2003.
 (c) Aggregate stack and fugitive emissions
 (d) Aggregate stack and fugitive emissions at Doe Run's Herculesum, Glover and Bass (lead recycling facility) sites.

Data Conversions from: SOLICITUD DE PRORROGA EXCEPCIONAL DEL PLAZO DE CUMPLIMIENTO PARA EL PROYECTO PLANTAS DE ACIDO SULFURICO

Pollutant/Source	MT/Day	MT/year	lb/year
Lead fugitives	0.11	40.2	88,514.7
Lead stack	6.6	2,390	482,807.4
Arsenic stack	0.3	109.5	241,403.7
Cadmium stack	0.02	7.3	16,093.6
Pollutant/Source	kg/day	kg/year	lb/year
Lead fugitives	60.5	22,082.5	48,683.1
Cadmium fugitives	2.8	1,022.0	2,253.1

Calculations:
 1 year = 365 days
 1 Metric Ton = 1000 kg
 1 kg = 2.2046 lb