

Mary Sky Schoolcraft

I want the AZDEQ to do their job of protecting the land, water and air quality of Arizona from being contaminated by pollutants, heavy metals, noxious materials and toxic runoff...as mandated by law in ARS 49-204(A)(1),(7),(9) and (10)...Please do not approve the permits for South32 (No.AZ0026387) to discharge tremendous amounts of mine water extracted from the aquifer and released without updating the TMDL. This is a gigantic new mining operation, NOT a continuation of a small 1963 mine.Please look at the impact of releasing up to 6.48 million gallons of mine water per day (for an undisclosed time) into Harshaw Creek, and it's impact on Sonoita Creek (which runs through the town of Patagonia and empties in Patagonia Lake.) As you can obviously see, a discharge of contaminated acidic water polluted with heavy metals, could have a huge impact on the residents of the town, users of the lake, and all the plant and wildlife in this riparian area which is a jewel of biological diversity.

AZDEQ must do the TMDL analysis and set standards in order to comply with the Clean Water Act.The point of discharge is in Upper Harshaw Creek (listed as impaired), which obviously also impacts Lower Harshaw Creek.The AZDEQ must revise its grossly outdated TMDL for Upper Harshaw Creek, and acknowledge the impairments to Lower Harshaw Creek and prepare a TMDL for Lower Harshaw Creek BEFORE it can issue the proposed AZPDES permit.

The same is true for Alum Gulch, which is impaired with elevated levels of cadmium, copper, lead, zinc and acidic pH that can result in heavy metals contamination. So, a new TMDL is also required for Alum Gulch.The tailings pile also contains tons of new mine waste materials, and thus seepage is not only from the historic tailings. AZDEQ must do a current analysis and update the TMDL BEFORE issuing a renewed permit.

These creeks, with contaminated water, flow into Sonoita Creek, which is impaired with zinc. Thus AZDEQ must complete a TMDL for zinc for Sonoita Creek, and a waste load allocation for discharges into Sonoita Creek. This is required by the Clean Water Act so that South32's discharges will not further contaminated or degrade these downstream waters but can support the future restoration of water quality in the creek.

Furthermore, the permit must include frequent or continual monitoring for all contaminants including Manganese and sulfate, not the infrequent periodic review in the Draft Permit. This close monitoring is necessary to protect human health and the drinking water systems and infrastructure of the Town of Patagonia and residents of the area BEFORE issuing a renewed permit.

The people of Arizona place their trust in the AZDEQ to uphold the requirements of the Clean Water Act and ensure that we are not exposed or ingesting water contaminated with arsenic, cyanide, lead, cadmium, mercury, uranium, manganese or sulfur.

We implore you to live up to the trust and do what is not only right but also legally mandated to protect human health and the quality of our environment.

Thank you for standing strong and doing your job.