

edward pirl

Ed Pirl, Board Memembr Calabasas Allianza, Rio Rico

Hello. I want to take this opportunity to share my opposition to the renewal of the Arizona Pollutant Discharge elimination Permit for the South32 Hermosa project.

The permit, which would allow discharges of mine water into Harshaw creek, Alum gulch and Sonoita Creek poses a threat to both the health of the public and the environment . Prior to renewing this permit the ADEQ must prepare a TMDL study and necessary waste load allocations as required by the Clean Water Act as well as a Planning process for achieving water quality standards So that the waters of Harshaw creek, Alum Gulch and Sonoita creek can be returned to good health.

The significant discharges of mine water into the tributaries leading to Sonoita Creek creates a significant issue given that Sonoita creek is impaired for zinc. ADEQ must complete a TMDL for zinc for Sonoita creek prior to renewing the permit The clean water act also requires a waste load allocation to be performed for the discharges to Sonoita creek so that south 32's discharges will not further contaminate surface waters downstream. ADEQ must take measures to uphold its duty to "act to protect the environment".

ADEQ must recognize the Hermosa project to be a new mine and a new source of discharge. As such it is subject to all modern performance standads and requirements of the Clean Water Act. There is ample evidence to support this claim. The current project is in no way similar to the much smaller project of decades past.

Finally, to protect the quality of drinking water,public health, the environment and the ecosystems in the region, Manganese and sulfate must be monitored along with the monitoring for other toxins like lead, arsenic, mercury, cyanide, and uranium on a monthly basis. At present the monitoring is far too infrequent, It is essential that monitoring take place MONTHLY if not more often. It is imperative that ADEQ revise the draft permit to require more frequent testing.

ADEQ exists to protect and improve the environment of Arizona, to provide for the prevention and abatement of ALL water and air pollution. You must step up and safeguard the water of this county and the environment of all who live here, humans, domestic, wild and endangered creatures. As Arizonans we deserve clean air and water and we expect our state agencies to remain true to their mandate and protect the environment.

I also reference and agree to all of PARA's comments in the document submitted by them