

Tina Brubaker

I am a resident of Patagonia and STRONGLY oppose the renewal the AZDPES for the South 32 Hermosa Mine. Water is our most precious resource and it needs to be protected and valued for all its benefits. I am referencing, full support and I am including PARAs comments as part of my comments.

The proposed discharge permit will allow dangerous discharge into our waterways, drain our life giving aquifer which the town of Patagonia relies on for drinking water. It threatens the health of the community, residents and greater environmental area.

Fact 1 - South 32 Hermosa is a CLEARLY A NEW MINE. The old mine in the similar site was closed down. And all legal steps need to take the NEW mine into consideration. No permits should be given without that consideration. ADEQ needs to live up to the standards set out in the ADEQ mission statement.

Fact 2 - the proposed monitoring are insufficient! Monitoring need to account for manganese and sulfate (among other toxic heaves metals) baselines need to be set and monitoring need to random as well as conducted at much more frequent intervals. Additionally, monitoring need to be done by an independent monitoring agency, NOT by the permit holder / potential polluter, South 32.

TMDL analysis needs to be completed for the Zinc in Sonoita Creek before issuing the permit. Wast load allocation for the discharge into Sonoita Creek MUST be preformed. This is mandated by the Clean Water Act.

Fact 3 - Santa Cruz County has been deemed in a multi-year extreme drought. The use of 6.5 million gallons of water being polluted and discharged is absolutely unacceptable under these conditions.

Fact 4 - ADEQ discharge location is in reality in Upper Harshaw Creek, not Lower Harshaw as falsely claimed. The permit must take the impairments of Lower Harshaw Creek into consideration. The true ongoing discharge must be calculated in the proposed permit.

We expect our State agencies to be true to their mandate - "To protect and enhance public health and the environment in Arizona. Through consistent, science-based environmental regulation..."

Sincerely,
Tina Brubaker