

Vanessa Register

January 11th 2024

ADEQ #AZ 0026387

Hermosa 32 Pollutant Discharge Permit

Good evening and Thank you for being here to listen to my concerns.

My name is Vanessa Register I live at Lake Patagonia, mailing address 105 Lado de Loma Nogales, AZ 85621

My concerns are for the record, the highest evidence, and will be submitted in writing and to be included in the minutes.

The very name of this application should be of great concern.

Pollutant Discharge

Your website goals and protections are:

To Protect and Enhance

Public Health and the Environment.

How can you as a board "Protect and Enhance" our Public Health and Environment?

How will this application for Hermosa 32 Protect and enhance our public health and environment?

How has H 32 performed in the past?

Can their self testing be trusted?

I submit to you that they can not be trusted to Protect and Enhance our Public health and environment, this falls to you.

The Federal Clean Water Act, that you are charged with enforcing requires that discharged pollutants into our affected waters are:

Prevented, Reduced and Eliminated.

Does this application protect our waterways, our surface waters?

These protections must be Science Based, a rigorous systematic endeavor that builds and organizes knowledge in the form of testable predictions.

The TMDL, Total Maximum Daily Load:

Must account for "all" sources of the pollutants that cause the water to be listed.

Your data base, the science, in this application does not account for "all"

"All" the rivers and locations have not been tested or reported.

"Testable" Predictions

1. You need a Base, you do not have a current base of contamination, it is not included in this application. Without a base you can not say how much you can allow to enter and be safe.
2. Unbiased sampling to ensure Total Maximum daily load of pollution to enter our surface water shall not be sampled by H32 and not a month later.

The discharge testing needs to be done by a third party, not the discharger H32, as submitted in this application.

Immediately sampled, not a week later as submitted in this application.

To know the contaminants that are being released the testing needs to be immediate, at several, predetermined locations to ensure the surface water quality in this permit is being met.

I ask you how are you going to change this application to ensure that "ALL: the pollutions do not exceed the maximum daily discharge and that "All" the locations are protected and enhanced?

Thank you

I would like to add, that this is a new mine, new owner, new mineral being mined.
H 32 needs to apply for a new permit.