

# Mark Berg

I object to the Arizona Department of Environmental Quality's proposal to renew the Arizona Pollutant Discharge Elimination Permit for the South 32's Hermosa Project mine until the following issues are resolved:

1. The discharge location is not in Lower Harshaw Creek, as ADEQ claims, but is actually constructed in Upper Harshaw Creek which is listed as impaired under Arizona's Clean Water Act 303(d)list. The 20-year-old Total Maximum Daily Load analysis must be updated before the permit can be renewed. Also, impairments in Lower Harshaw Creek must be acknowledged and a TMDL be prepared.
2. The outdated TMDL for Alum Gulch must be updated and a new study completed on the new lead impairment before the permit is renewed.
3. ADEQ must complete a TMDL for the zinc impairment in Sonoita Creek before renewing the permit.
4. ADEQ must revise the Draft Permit to required monitoring for manganese and sulfate to protect the drinking water for the Town of Patagonia. The permit must require this monitoring be done at least monthly.