

Jerry H. Gill

Dear Karen Peters, ADEQ Executive Deputy Director,

I urge you to reject the proposed air-pollution permit for the Copper World mine. As it's currently drafted, the proposed permit does little to ensure the mine protects our air or environment. Instead, it gives the mine a free pass to pollute.

The draft permit would allow for the construction of a massive open-pit mining operation in the Santa Rita Mountains south of Tucson. Daily operations will include blasting, ore crushing, processing, and the construction of a sulfuric acid plant. These activities have the potential to release thousands of tons of toxic air pollution every year, threatening public health and the environment.

I'm especially concerned that the permit contains the following deficiencies:

- It exempts the mine from compliance during malfunctions, startups, and shutdowns. If the mine can't comply at all times, it shouldn't get a permit to pollute.
- It fails to require actual monitoring of emissions from all sources to ensure compliance with all limits. Monitoring must be required to ensure compliance.
- It lacks specific terms and conditions to ensure the enforceability of all emissions limits.
- It inappropriately classifies certain emissions sources as "fugitive," allowing the mine to avoid more stringent permitting and pollution-control requirements.
- In short, it doesn't make sure the Copper World mine will fully protect the air we breathe.

For these reasons and more, I call on you to deny the permit application.

At a minimum you must require the Copper World mine to obtain a Class I permit. Under the Clean Air Act, a Class I permit imposes more stringent requirements to control emissions, ensure monitoring, and ensure more extensive public involvement. A Class I permit is necessary so that the mine is **always** accountable for limiting its air pollution and protecting the environment — no exceptions.

For too long the Arizona mining industry has been allowed to pollute with impunity. I urge you to hold Highbay Minerals and the Copper World mine accountable instead of giving them a free pass to pollute.

Copper World Air Permit Questions:

- Why is ADEQ including loopholes that allow for excess emissions during emergencies, malfunctions, startups, and shutdowns?
- Why did ADEQ categorize ore processing as fugitive emissions sources?
- Assumed control efficiencies for many of the pollution control systems, including scrubbers and filters, are as high as 99%. With such a messy and variable process, how is it possible that Highbay will assure compliance with these high control efficiencies at all times?
- How will emissions from blasting be monitored?
- Why was Highbay allowed to exclude PM10 monitoring data when assessing ambient air quality impacts?

These comments are derived from technical analysis conducted by the Center for Biological

Diversity.