

Edward Laake

To Karen Peters, ADEQ Executive Deputy Director, and ADEQ agency:

I urge you to reject the proposed air-pollution permit for the Copper World mine, a draft permit that would allow for the construction of a massive open-pit mining operation in the Santa Rita Mountains south of Tucson. Daily operations are expected to 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, and you providing an exception can threaten public health and the environment.

I'm especially concerned that the permit doesn't make sure the Copper World mine will fully protect the air we breathe.

For these reasons here and more, I call on you to deny the permit application. At a minimum, I urge you to require the Copper World mine to obtain a Class I permit, meet the Clean Air Act, and to hold Hudbay Minerals and the Copper World mine accountable as follows.

1. ADEQ must remove loopholes that allow for excess emissions during emergencies, malfunctions, startups, and shutdowns.

The Clean Air Act is a federal law and state permits must follow federal standards for pollution emissions, to prevent exceeding emission standards even during unusual events.

2. ADEQ must properly categorize some ore processing as non-fugitive emissions.

3. ADEQ must ensure the permit contains enforceable standards and monitoring to guarantee that pollution controls operate effectively. The plan should specify what the manufacturers' specifications are and how the mine will verify that a) these specifications are being met and b) that meeting these specifications will adequately control emissions.

4. Emissions from blasting must be monitored and limits on timing and frequency of blasting must be estimated. The level of toxic emissions from blasting, for example of poisonous nitrogen dioxide, can vary widely depending on environmental conditions and timing. If charges are set on one day but not exploded until the next, the explosive charge may absorb moisture from the air, which can greatly increase the amount of nitrogen dioxide released during blasting.

5. Hudbay should not be allowed to exclude effects of high wind events when assessing ambient air quality impacts of PM10.

PM10 refers to particulates 10 microns or less in diameter. It is assumed that particulates are regulated by the EPA and may include heavy-metal toxins like lead, selenium, and cadmium. In projecting the possible concentration of PM10 emissions caused by wind blowing over tailings piles, if ADEQ allows Hudbay to exclude high wind events under the theory that these were outliers and not likely to happen, anyone who lives in Tucson knows that days with extreme wind are common. Such winds can cause the dust to blow. ADEQ should not allow Hudbay to model future dust blows based on only lower-velocity wind events.

6. ADEQ must independently monitor and verify the assumptions made by Hudbay in its application. If ADEQ relies on Hudbay to monitor the release of emissions, ADEQ should independently verify air emission levels. The agency must ensure independent monitoring is done to protect public health and the environment.

7. ADEQ must classify Copper World as a Class 1 source of emissions and not a Class 2. If ore-processing emissions are correctly categorized as standard emissions and not fugitive emissions, then total standard emissions would require Copper World to be classified as a Class I source of air pollution, not a Class II.

I am not against mining of Arizona's precious natural resources, but careful oversight and monitoring of mining operations will also protect other Arizona natural resources, our precious air, and clean environment not only in the Santa Rita Mountain area, but where you have responsibility for long term livability for all of us (including the workers at the mine) and our children.

Sincerely, a concerned Arizona citizen,
Edward Laake
13572 N. Holly Grape Dr
Marana, AZ 85658