

Kevin Pakulis

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 Hudbay 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 Hudbay will assure compliance with these high control efficiencies at all times?
- How will emissions from blasting be monitored?
- Why was Hudbay 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.*