Nina Luxenberg

Copper World's permit application indicates that it intends to enclose the copper concentrate stockpile at the proposed mine. This intention is acceptable for fugitive emissions, but as the Center for Biological Diversity has already pointed out, Copper World has inappropriately excluded non-fugitive emissions from its application, erroneously claiming the its proposed mine would not be a major source and not require a Class I permit. Since non-fugitive emissions do not require the construction of collection systems, Copper World would need to take steps to limit non-fugitive emissions or control non-fugitive emissions in ways that comply with applicable permitting requirements. Neither of these options has, as far as I can tell, been addressed by Copper World.