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I contend that Copper World's application for a Class II air pollution permit for the Copper World Mine Project, a new open pit copper mine in the Santa Rita Mountains in Pima County, is based on false data. Copper World did not appropriately calculate potential emissions. It claims to qualify as a "minor source" eligible for a Class II permit, but according to the true data, it has the potential to emit 100 tons or more, NOT less, per year of any pollutant. Copper World as far as I can tell is a "major source" applicable for a Class I permit only.

I find it very concerning that Copper World improperly characterized and inappropriately excluded non-fugitive emissions. Copper World notes in its Class II permit application that emissions from "rock breakers and material transfer point" are fugitive and can be collected using dust collectors, enclosures, and other techniques. But fugitive emissions by definition can "reasonably pass-through" a "vent, stack or functional equipment opening". This is not true for rock breakers and material transfer point – these emissions are non-fugitive.

Copper World's proposed mine poses serious risks to air quality, public health, and the environment. It is critical that ADEQ ensure that the Copper World Mine Project is subject to appropriate scrutiny and permitting under the Arizona SIP and applicable requirements of the Clean Air Act. This must start with assuring the Copper World Mine Project is subject to Class I permitting requirements under the SIP.