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ADEQ must ensure that the permit contains enforceable standards and monitoring to guarantee that pollution controls operate as effectively as Hudbay asserts. There is nothing in the permit that specifies that Hudbay and/or ADEQ must monitor pollution control systems. Even if Hudbay says the manufacturer claims their scrubbers and filters are 99% efficient, neither Hudbay nor ADEQ is factoring in equipment malfunctions, transient disruptions or human error at the proposed mine. Dust collection systems do well controlling particles 10 microns or larger. But this Class II permit that is before us does not adequately address compliance standards for particulate matter down to 2.5 microns. And it is these tiny airborne pollutants that can evade the hair in our nostrils and the mucus in our throats, which are our filtering mechanisms, and make their way down to the tiny air sacs deep in our lungs and put our citizens at risk for asthma, emphysema, bronchitis, cancer, and chronic obstructive pulmonary disease, which leads to oxygen deprivation, heart attacks, strokes, and premature death.

In conclusion, the plan should specify what the manufacturers' specifications are and spell out

- 1) How Hudbay will meet the specifications of controlling emissions down to 2.5 microns, and
- 2) What entity is qualified to objectively verify that pollution control is being properly implemented at the mining site.