

September 9, 2024

Dear Karen Peters, ADEQ Executive Deputy Director:

I urge you to reject the proposed air-pollution permit for the Copper World mine in the Santa Rita Mountains. As currently drafted, the proposed permit does not ensure that the mine will protect our air quality.

The draft permit would allow construction of a massive open-pit mining operation in the Santa Rita Mountains south of Tucson. Daily operations would include blasting, ore crushing, processing, and 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.

The permit contains the following deficiencies:

- It exempts the mine from compliance during malfunctions, startups, and shutdowns.
- 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, such ore processing, as “fugitive,” thus allowing the mine to avoid more stringent pollution-control requirements.
- The permit simply does not ensure that the Copper World mine will protect the air we breathe.

For these reasons, I ask you to deny the permit application.

Sincerely,

David W. Steadman
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