

Ernest Wittenbreder

Copper World gives an unrealistic claim in its Class II permit application that it will achieve 99% control efficiency for all pollutants with fogging sprays, scrubbers, and dust collectors. Even though these methods are known to achieve high control efficiencies, Copper World would need to operate and maintain its equipment at near-perfect performance levels at all times for 99% control. It is highly unlikely that there would be no malfunctions, no upsets, no human errors during the life of its proposed mine.

While dust collection systems can often achieve high levels of coarse particulate matter control, it is a known fact that they do not necessarily achieve the same level of control for fine particles, or PM10 and PM2.5. I am concerned that emissions of PM10 and PM2.5 have been significantly underestimated by Copper World. Even if Copper World's assumed control efficiencies are erroneous by just 1 or 2%, the potential to emit from a number of activities could be more than double what is currently estimated.

As a citizen of Pima County, I am deeply concerned about the serious risks the Copper World Mine Project poses to our air quality, health, and 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, not Class II, under the SIP.