

Christi Moody

I oppose Hudbay's request for a Class II permit based on the following reasons.

This should be a Class I permit in accordance with Arizona Administrative Code (A.A.C.) Title 18, Chapter 2, Article 302(B)(1) Any Major Source - A "major" source as defined by the A.A.C. Title 18, Chapter 2, Article 101(64) is any source that has the potential to emit 100 tons per year of any criteria air pollutant.

Hudbay Class II permit was initially written in 2022 prior to February 2024 when the EPA strengthened the National Ambient Air Quality Standards for Particulate Matter (PM NAAQS) to protect millions of Americans from harmful and costly health impacts, such as heart attacks and premature death. EPA is setting the level of the primary (health-based) annual PM2.5 standard at 9.0 micrograms per cubic meter to provide increased public health protection, consistent with the available health science. I expect ADEQ to abide by the newly set standards.

Hudbay intends to drill 24x7, 365 with the potential to emit TSP, PM, PM10 and PM 2.5 emissions. PM 2.5 is so small they go into the lungs all the way to the air sacs called alveoli. Once there, they can irritate and corrode the alveoli wall, damaging the lungs and causing lung disease. Particulate matter found in the air can make existing lung diseases, like asthma and COPD worse, as well as cause pneumonia, heart disease, stroke and lung cancer. I do not believe Hudbay has adequately considered this in their permit. The close proximity of the Copper Ridge Elementary School, estimated at 5.9 miles (estimated due to fencing preventing further advancement), Sycamore Canyon, Ocotillo Preserve, Corona de Tucson and other surrounding rural areas will be impacted based on daily winds that occur in the area. These small toxic particles will also damage vegetation, destroy local wildlife making it devoid of life based on the life of this mine.

Meteorological monitoring must occur at locations throughout Corona de Tucson and Quail Creek not just surrounding the mine. The nighttime inversion of the Sonoran desert consists of a layer of cooler air trapped near the ground by a layer of warm air above the surface. This is visible from higher elevations and essentially traps dust and pollen in the air and becomes a potential health threat to our community.

ADEQ, I know you are aware of the current air quality concerns that residents of Patagonia AZ are experiencing as well as the air quality hazards caused by the Freeport Sierrita Mine in Green Valley. (Phoenix, Ariz. – June 21, 2004 The Arizona Department of Environmental Quality and the Attorney General's Office have settled a joint lawsuit against Phelps Dodge Corporation for environmental violations committed at its Sierrita mine, located near Tucson. The U.S. The Environmental Protection Agency joined the lawsuit, and will share the \$1.4 million penalty assessed for allegedly violating the Clean Air Act.) A great win for the state but 1.4 million will not, does not alter damage residents have endured.

I believe Hudbay's efforts to control 90+ percent of the pollutants produced by open pit mining is usually high coming from a company that looks to cut operational costs regularly, evident when you read Hudbay De-risks Copper World Phase I with Enhanced Pre-Feasibility Study dated Sept 2023.

Water is not an option for dust control. Water droplets can only capture dust particles that are roughly similar in size. This inefficiency means that the smallest particle matter such as PM 2.5 stays in the air longest, travels the furthest, and goes deeper into the lungs. Using water is wasteful especially in the arid desert.

I want to see clear and concise maps of the Copper World Complex, Tailing piles included, in proximity to Corona de Tucson. It is misleading to continually chop the maps to exclude the community that will most likely be affected by their air pollution.

In closing, Appendix F is missing from all posted documents yet it is continually referred to. I am unable to continue comments as a result.



