

Tom McCarty

I have been in Green Valley for since 1986 and have also lived in New Mexico, Utah, Alaska, and Utah. I have worked for over 35 years as a state environmental compliance officer and am familiar with resource extraction industry and all it brings to the people and environment where it operates. It brings jobs but not in the numbers promised and not necessarily to the local workforce. It brings health and environmental issues when it fails to meet permit compliance and penalties are insufficient to bring about permanent change. It wrecks havoc on infrastructure and takes no responsibility to share in the cost of repair and maintenance. And when the resource has been depleted they take no responsibility for clean up and restoring the land to its original form. In short they are poor at keeping promises and being good stewards of the environment and to the health and safety of those that work and live in the area.

Given this, I urge you to reject the proposed air pollution permit for the Copper World mine. As it is currently drafted the proposed permit does little to ensure the mine protects our air, water, environment. It basically gives the mine a free pass to pollute. We must remember that operation of large scale open pit mining involves processes that create toxic air pollution and use highly toxic sulfuric acid processes. These processes if not monitored continuously and records kept per stringent permit compliance, will allow releases of these toxic materials into the environment and become health and safety concerns to residents and workers as well.

I am concerned that the current permit has the following deficiencies:

It exempts the mine from compliance during malfunctions, startups, and shutdowns. If the mine cannot comply at all times it should not receive a permit to pollute.

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 as fugitive allowing the mine to avoid more stringent permitting and pollution control requirements.

It doesn't make Copper World protect our air quality.

So here are my questions to you ADEQ:

Why is ADEQ including loopholes that allow for excess emissions during emergencies, malfunctions and startup/shutdown? Look at the many times our existing mining operators have not had to meet AQ monitoring and the releases have been visible and felt throughout Green Valley and Sahaurita. Is human health not a concern for the ADEQ?

Why did ADEQ categorize ore processing as fugitive emissions sources?

Why does ADEQ accept Hudbay's assertions that their emission control systems work at 99% efficiency in the work environment when we know that is only possible in lab controlled conditions?

How will emissions from blasting be monitored. What is the timing and frequency of blasting. How will ADEQ know if their air permit has been exceeded by these events?

Why was Hudbay allowed to exclude effects of high frequency wind events when assessing ambient air quality impacts of PM10?

ADEQ is relying on Hudbay monitoring of emissions and not doing their own monitoring. In my experience that never works and allows them free rein to run their operations with little regard to air

pollution and the health of workers and residents of the area and the environment.

Until these issues and questions are addressed I do not see how ADEQ can allow this permit application to move forward. For far too long the mining industry in Arizona and most other states and countries has been allowed to operate under an outdated 1872 law which gives wide allowances to pollute with impunity. These operations must be held accountable and a proper permit and adequate (state/fed not just by the company) monitoring. AND appropriate Penalties!