

# Kelsey Yule

To Whom it May Concern,

In response to the Hubbay ADEQ air quality permit application dated April 11, 2024, concerned parties, including environmental organizations and advocates, have raised substantial objections. The application pertains to Copper World Inc.'s proposal for a Class II air pollution permit for their Copper World Project in Pima County's Santa Rita Mountains. I and others believe that Hubbay should require a Class I permit due to potential emissions that may exceed Class II thresholds.

The primary concern centers on the classification of emissions as fugitive versus non-fugitive. Under Arizona's State Implementation Plan (SIP), a Class I permit is required for sources projecting 100 tons per year or more of any air pollutant, while Class II permits are for lower emissions. I and others would argue that Copper World's classification of emissions as fugitive is inaccurate. They contend that emissions from activities like rock breakers and material transfer points could feasibly be collected through standard technologies like dust collectors, thus making them non-fugitive. This misclassification could result in underestimating emissions and circumventing more stringent regulatory scrutiny.

Additionally, I am skeptical regarding Copper World's projections of achieving 99% control efficiency for all pollutants using fogging sprays, scrubbers, and dust collectors. Such high efficiencies are impractical over the operational lifespan of the mine and may lead to underestimated emissions of particulate matter, including PM10 and PM2.5. This discrepancy could pose significant risks to local air quality, public health, and the environment, especially considering the proximity of the Santa Rita Mountains to residential and protected areas.

I am urging ADEQ to reevaluate the permit classification and ensure that Copper World adheres to more stringent Class I permit requirements. There is a need for accurate emission assessments and robust control measures to mitigate potential adverse impacts. The outcome of this permitting decision will likely hinge on ADEQ's interpretation of fugitive emissions and the adequacy of proposed control technologies in safeguarding air quality and public health in the region.

There are broad implications of regulatory oversight in balancing industrial development with environmental protection, particularly in sensitive ecological areas like the Santa Rita Mountains. As stakeholders await ADEQ's decision, the scrutiny over Copper World's permit application reflects ongoing debates over responsible resource extraction and environmental stewardship in Arizona.

Thank you for your time -  
Kelsey Yule, PhD  
Tucson, AZ