

# Dan Sprenkle

Reasons to deny Title V permit to Aluminum Dynamics, Inc. in Benson:

1. ADI provided data for computer modeling. ADI knows the emission limits that will appease ADEQ and the EPA. By allowing ADI to provide data, they can skew the modeling in their favor and at the detriment of the environment, people, and animals in Benson. A much simpler analogy is a police officer allowing a person to fill out their own speeding ticket but with far greater consequences.
2. ADEQ stated on July 28 that the modeling is theoretical because "we don't know what they will emit." This attitude is unacceptable. Heavy industrial machines are designed with minimum and maximum limits. If ADEQ cannot accurately predict the amount and concentration of emissions before the plant operates, then DENY the permit.
3. The baseline sample for Nitrogen Dioxide was collected in Tucson which is 35 miles away. ADEQ claimed that this location was a benefit to the Benson residents. Perhaps this is true but how many other measurements were captured that benefit ADI? I am not confident that any of the measurements are accurate and will result in a fair and science-based modeling.
4. Per an ADEQ panel member on July 28, ADEQ doesn't normally deny permits. This is outrageous and begs the question; why does ADEQ exist? The word "quality" in your title implies that you put environmental quality above all other concerns.
5. ADI cannot be trusted to self-report and are not required to use continuous emission monitoring system:
  - 5a. ADI's vice president stated publicly in November 2024 that the plant will emit warm and clean air. This is a blatant lie! If the air was clean, there would be no need for a Title V permit.
  - 5b. ADI's parent company, Steel Dynamics, has had 11 violations since 2021. The imposed fines do not motivate them to improve their processes to reduce toxic emissions and protect the people who live near their plants. They will not suddenly grow a conscience and report their emissions with integrity.
6. If you aren't willing to live near this smelter, then do not approve the permit.