

# Richard Samartino

I am writing in opposition to the air permit for the Aluminum Dynamic Project because of the following concerns:

- Statute requires control technology for hazardous air pollutants; the draft air permit proposes baghouses which will only capture particulate matter, not gaseous toxins. Therefore, the permit omits legally required controls.
- Statute requires that permits contain enforceable conditions and standards; the draft permit uses calculations instead of monitoring to verify compliance. Since compliance cannot be independently verified, the permit should not be approved.
- The draft permit does not model the cumulative effect of risks from multiple pollutants, it only analyzes thresholds for individual pollutants. This insufficiently accounts for the real-world risks of releasing multiple pollutants in the air, and the "evaluation of residual risk from combined hazardous air pollutants" is required by statute.
- The required visibility impact analysis for a Class I area, the San Pedro NCA, was omitted
- The history of the company must be taken into account. Steel Dynamics, the parent company of Aluminum Dynamics, was found to be violating its Title V permit at each of its plants in Butler, Indiana by the EPA. As part of its settlement, the company paid \$475,000 in fines and was required to spend \$3 million to upgrade its air pollution control equipment (<https://www.epa.gov/newsreleases/epa-settlement-steel-dynamics-inc-will-reduce-air-pollution-butler>). We cannot afford air quality violations in such a fragile and precious area as Benson and the San Pedro Riparian area. The area could be forever degraded by pollution, and the permit omits the necessary monitoring controls to ensure adequate independent verification to prevent the company from endangering the environment yet again.

I am a resident of Cochise, AZ and have my own concerns about the air pollution emitted by this plant reaching my property. As a resident of Arizona and our beautiful and fragile planet, we cannot allow this air pollution in the San Pedro River area, or in Benson where it would endanger the health of nearby senior residents. Please fulfill your mission to protect Arizona's environment by rejecting this air quality permit.

Sincerely,  
Rich Samartino