

# Misty Bloom

I am writing to express my opposition to this Aluminum Dynamics Casting Facility for various reasons.

At the ADEQ informal meeting the various experts presenting said publicly "they are theoretical numbers because we will not know what they'll be emitting until they're operating." There is video of this and these comments were made publicly and in front of a couple hundred people.

How does ADEQ have the legal right to permit a plant with theoretical numbers? Doesn't this plant have to be practically enforceable by the public? This permit is therefore illegal and should not be approved.

Myself and others spoke to Dan Arnold, a developer who claims to have brought this Aluminum Dynamics Casting Facility to Benson this week as well as an Aluminum Dynamics employee (Bill Glaser) in separate meetings. Both claimed a 90 ft deep melting/casting pit would be on site. The water table in January/February was around 75 ft. This would indicate contact with the water table. This melting/casting pit will have various chemicals as well as aluminum. We understand the site to be on a fault line and right along the river. What happens when this pit cracks or leeches chemicals into the aquifer? How many people will be sick who use this water with their nearby wells? This would necessitate an Aquifer Protection Permit issued preemptively, which I understand has not been applied for.

Furthermore, some of the Hazardous Air Pollutant amounts were left in equation form in the permit. You should not need a degree in math to understand what this plant will be emitting. Further proof showing this permit is not enforceable by the public as a practical matter.

A simple Google search resulted in this:  
"AI Overview"

Ensuring practical enforceability of Title V permits: key elements and considerations  
Title V permits are designed to be legally enforceable documents that consolidate all applicable Clean Air Act requirements for a given facility. To be effective and achieve their goal of protecting air quality, these permits must also be practicably enforceable. This means they need to be written in a way that allows regulators and the public to readily assess a facility's compliance.

Here's a breakdown of what constitutes practical enforceability and how it's achieved:

## 1. Clear and specific permit conditions

- \* Unambiguous limitations: Emission limits and other requirements must be clearly stated, leaving no room for misinterpretation or loopholes.
- \* Identification of sources and limitations: The permit must clearly specify which sources or activities are subject to particular limitations and the timeframe for those limitations (e.g., 12-month rolling sum, not calendar year limits).
- \* Explicit operational requirements: If control equipment is required, the permit must explicitly state that the equipment must be operated whenever the controlled process is in use.

## 2. Sufficient monitoring, recordkeeping, and reporting

- \* Adequate monitoring: The permit needs to include monitoring requirements (e.g., Continuous Emissions Monitoring Systems (CEMS), periodic testing) sufficient to yield reliable and

representative data on a facility's compliance.

- \* Detailed recordkeeping: Facilities must be required to maintain comprehensive records, including emissions data, operating logs, and maintenance records, for a specified period (typically five years).

- \* Timely and accurate reporting: The permit must define the frequency and format for reporting, including prompt reporting of deviations, semi-annual monitoring reports, and annual compliance certifications.

### 3. Transparency and accountability

- \* Identification of responsible parties: The permit should clarify who is accountable for ensuring compliance with its terms and conditions.

- \* Public and EPA review: Title V permits undergo public comment periods and EPA review to ensure their adequacy and enforceability before issuance.

- \* Citizen suits and EPA oversight: Both the public and the EPA have mechanisms for enforcing permit requirements and ensuring that permits are practically enforceable.

The residents of Benson demand oversight of these matters and rely on ADEQ to do their job and protect Arizonans, not polluters. You are the entity entrusted to do so. We expect this permit be rejected, we expect ADEQ to demand Continuous Emissions Monitoring and an Aquifer Protection Permit. Please consider the liability this plant is to the residents of Benson, the devastation to our aquifer, the San Pedro River, and our health. Theoretical numbers don't cut it. Do the right thing and reject this permit.

Regards,  
Misty Bloom