

# DANIEL SPRENKLE

I strongly urge ADEQ to NOT grant a Title V permit to Aluminum Dynamics.

1. Per ADI documents, ADI did not collect all of its data from the Benson area. At least one piece of data was collected from a location in Tucson.
2. Per ADI's ADEQ Permit Application, the smelter will emit 10 tons of aluminum particulate annually. This is extremely dangerous to people and animals. The plant will sit near a retirement home, schools, houses, and apartments and will put the health of children, the elderly, and otherwise healthy adults at risk.
3. The smelter will use a tremendous amount of water! ADI claims that it will recycle much of its water but third party analyses conclude that water usage will exceed Benson's current use (see attachment). We live in a desert with a finite amount of water that ranchers, farmers, and households depend on.
4. Aluminum dust is very flammable. Benson has only a volunteer fire department.
5. ADI claims that the plant is not a smelter. However, on page 4-15 of their revised ADEQ Class I Permit Application, the plant is labeled with SIC code 3341, "Secondary Smelting and Refining of Nonferrous Metals".
6. The health and environmental damage to Benson will be too great to justify approving the Title V permit. PLEASE DO NOT GRANT THE PERMIT.

On average, it takes about 15 gallons of water to recycle a pound of aluminum. This plant, at full capacity, is targeted to generate 300,000 us tons of aluminum. At those numbers that means that they will likely use 600,000,000 (yes million) gallons of water per year. They say they will be operating 24/7 so that is 1,643,835 gallons per day. 68,493 gallons per hour and 1,841 gallons per minute. A staggering amount of water. It is not the 5,000 gallons per minute previously mentioned because that did not take into account the recycling of water but still staggering. That is an unnecessary burden on the aquifer which is a limited resource.

Lets take this down to what it means for the city of Benson. The water system in Benson produces 1,800,000 gallons of water per day on average as per their reports to ADWR. The system is designed to produce up to 3,000,000 million gallons per day. Take the 1,800,000 of current demand and add the daily demand from ADI, 1,643,835 and you get a daily demand of 3,444,383 gallons per day. A full 444,383 gallons over the design capacity of Benson water.