Janelle Dobash

ADEQ Arizona Department of Environmental

Quality. It's interesting that no Environmental Impact Study has been conducted for this Aluminum Dynamics secondary smelter that is 1/10 from the last free-flowing river in the Southwest. It is 140 miles and flows through four counties before joining its confluence in a fifth. That covers a lot of environment! Shouldn't an Environmental Impact Study be the first thing required?

Over 2500 people are opposed to this aluminum plant and have signed a petition stating so. Benson's population is approximately 5300, so over 2500 opposed is significant.

It is very disappointing that ADEQ will rely on Aluminum Dynamics to self-monitor and self-report violations. That is like putting the fox in charge of guarding the hen house. Appropriate because Aluminum Dynamics are wolves in sheeps' clothing. Their MO is not disclose a single fact about their operations to residents, and somehow they managed to get the City of Benson officials to follow the same MO. No transparency has not given the public reason to trust ADI or Benson's local government at all.

Supporters argue that there is already pollution in the area. Is that a valid reason to bring more? No! While ADEQ believes the emissions numbers submitted by ADI, residents of Benson know better than to trust them. And you will be giving them a Title V permit with a school less than a mile away? That is totally inappropriate. The parent company has 93 violations online and over \$11.5M in fines. Would you want them in your neighborhood?

In closing, I'm opposed to this Title V permit being issued to a company that has not been transparent, has not done an Environmental Impact Study, plans to use a huge amount of water that Benson doesn't have to give, will pollute the lungs of school children, and heaven forbid there is an emergency because Benson doesn't not have the resources to respond to an emergency involving hazardous materials.