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Dear ADEQ,

Below are my comments submitted during the formal comment period.

CAA §112(d) - Requires Maximum Achievable Control Technology (MACT) for hazardous air pollutants (HAPs).

ARS §49-427(A) - Arizona incorporates federal HAP requirements.

ADI reports dioxin/furan emissions (2.82E-09 tpy) based only on EPA emission factors. Although baghouses are proposed, they capture particulate matter only.

They do not control gaseous toxins like dioxins, HF, or HCl. No

monitoring or additional control technology is proposed. The application acknowledges toxic emissions but fails to propose legally required controls.

ARS §49-480 - Permits must contain conditions that are practically enforceable.

AAC R18-2-306(A)(5) - All permit terms must be enforceable by ADEQ.

CAA §504(c) - Permits must include enforceable limitations and standards.

ADI relies on emission factor calculations rather than continuous monitoring or site-specific testing.

A permit cannot be approved if compliance cannot be independently verified.

CAA §165(a) (4) - New major sources must apply BACT.

CAA §112(d) - HAPs must be subject to MACT.

AAC R18-2-406(H) - Arizona PSD permits must require BACT.

Baghouses are included for PM, but no Best Available Control Technology (BACT) review for NOX, VOCs, or CO, and no MACT review for hazardous pollutants such as HCl, HF, or dioxins.

The application omits the mandatory technology review for major pollutants and HAPs.

CAA §112(f) - Requires evaluation of residual risk from combined hazardous air pollutants.

ARS §49-427(A) - ADEQ must regulate HAPs to protect public health.

ADI modeled pollutants individually against thresholds but did not evaluate cumulative exposure (combined risks from multiple pollutants). The analysis is incomplete because real-world exposures occur simultaneously, not in isolation.

CAA §165(d) (2) (C) - Requires analysis of impacts on visibility in Class I areas.

AAC R18-2-406(I) - ADEQ must ensure no adverse impact to Class I areas.

ADI capped NOx and VOC emissions just below major source thresholds to avoid full PSD review.

They used AERMOD only, which is not sufficient for Class I area visibility or deposition analysis.

No CALPUFF modeling or comprehensive San Pedro Riparian

NCA evaluation was provided. The San Pedro Riparian NCA was not given the required visibility and deposition protection review.

AAC R18-2-306 - Records must be sufficient for enforcement.

CAA §504(c) - Compliance must be verifiable and enforceable.

ADI proposes to calculate emissions monthly using throughput and emission factors, without continuous monitoring or independent verification. Reliance on self-reported calculations leaves emissions unverifiable and unenforceable.

AAC R18-2-306.01 - Voluntary limits must be federally enforceable.

CAA PSD Program - Major sources cannot circumvent PSD by unenforceable caps.

ADI voluntarily limited NoX and vOC emissions (both just under 100 tons year) to avoid stricter PSD review and controls. Without enforceable monitoring, these caps are not credible. ADI's emission caps are a regulatory avoidance strategy, not a substitute for PSD compliance.

I look forward to your response. Thank you.