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The ADI site is in close proximity to schools, public places, nursing homes, residential areas, local businesses and the delicate San Pedro River Riparian area. The San Pedro River is one of the last free flowing rivers in the United States and the residents of the area as well as state agencies have an obligation to protect it. The water usage that ADI intends to use is disturbing. There is no clear number published. Any way you look at it their annual water usage will be close to that of the town of Benson. This project will essentially double the water usage by the city and is guaranteed to put a strain on the surrounding aquifers that many rely on for their water needs. Many of the monitoring wells in the area are already below regulatory levels as described in the recent lawsuit between the Center for Biodiversity and ADWR.

The emissions created by the ADI site are modeled to be within regulatory guidelines, however this still doesn't make it a suitable location for this project. ADI has reported that they will not have emissions controls on their furnaces and will be relying solely on baghouses to control emissions.

How does ADI plan to monitor the filters in the baghouses and change them at necessary intervals to prevent unnecessary pollution?

How does ADI plan to dispose of the contaminated limestone filters?

How does ADI plan to prevent further contamination from their produced waste?

What are the long term effects from exposure to the materials being exhausted from the baghouses?

What measures will be taken to protect the rivers delicate ecosystem and prevent further contamination (Apache Nitrogen Superfund site) from residual runoff from the site given the close proximity to the river?

How will emissions be reported to ADEQ?

Will there be a CEM system in operation? If not, why?

How will ADEQ hold ADI accountable for violations to their permit?

Will ADEQ have the right to shutdown operations at the ADI site in the event of non/inaccurate reporting?

What would make ADEQ deny the permit to ADI?

I do not support this project given the close proximity to the town of Benson and the area for reasons mentioned above. There are many other places better suited for an operation such as this one. I feel that a state agency such as yourself should realize that and have some authority in this matter.