

# Kristin Bidegain

Dear Arizona Department of Environmental Quality,

I am writing to express my strong opposition to the proposed Title V air quality permit for Aluminum Dynamics, Inc. The proposed facility would be located near residential communities, schools, farms, and the San Pedro River—putting our air, water, health, and way of life at risk.

According to the draft permit, the facility would be allowed to emit:

- Particulate Matter (PM<sub>2.5</sub> & PM<sub>10</sub>)
- Nitrogen Oxides (NO<sub>x</sub>) and Carbon Monoxide (CO)
- Volatile Organic Compounds (VOCs)
- Hydrogen Chloride (HCl), a hazardous air pollutant

These pollutants are linked to respiratory and cardiovascular disease, asthma, and cancer. In particular, PM<sub>2.5</sub> is known to travel deep into the lungs and enter the bloodstream. Rural communities like ours deserve clean air and water—and this project would put both at risk. Additionally, the plant would use significant water resources in an already water-scarce region, and the potential for heavy metals or chemical discharge into local groundwater or the San Pedro River has not been addressed. These omissions raise serious environmental red flags.

I am concerned that the applicant, Steel Dynamics (parent company of Aluminum Dynamics), has a track record of over \$6.2 million in environmental fines and almost \$460,000 in safety violations. This pattern of behavior gives me no reason to believe they would comply with regulations here.

I urge ADEQ to deny this permit on the basis of health risks, environmental injustice, water scarcity, and the applicant's history of noncompliance.

A Title V permit is considered enforceable as a practical matter only when it contains clear, specific, and measurable limitations, along with adequate monitoring, recordkeeping, and reporting requirements. These elements allow for verifiable compliance with applicable federal requirements. The projected emissions from this facility constitute an imminent and substantial endangerment to public health and safety as well as the natural environment, constituting a hazard to local agriculture and ranching, endangered species, and passersby.

Specific concerns related to the ADEQ Title V Permit are as follows:

1. The emissions limits on criteria pollutants on this permit are not defined. The public should not have to hire an engineer to determine what these emissions limits are and to determine if the facility is in compliance with emissions limits. Federal statutes require that the Title V permit contain clear, specific, and measurable limitations, along with adequate monitoring, recordkeeping, and reporting requirements.
2. What are the annual emissions limits for this facility, for each criteria pollutant: the Carbon Monoxide (CO), Nitrogen Oxides (NO<sub>x</sub>) Volatile Organic Compounds (VOCs), particulate matter, both PM<sub>10</sub> and PM<sub>2.5</sub>, the dioxins, furans, hydrogen fluoride (HF), lead, and the hydrochloric acid (HCl) emissions?
3. The opacity requirements in the permit are to be measured using EPA Method 9, which only works in daylight hours. If the facility is going to operate at night, or cloudy weather, Continuous

Emissions Monitoring (CEM) technology would be required on the stacks' emissions points and other locations, such as the fugitive emissions of particulate matter. Why is EPA Method 9 being used on a facility that would operate 24/7 and in cloudy weather when the EPA Method 9 requires daylight? Why isn't Continuous Emissions Monitoring required?

4. This Title V permit violates the requirement of federal statutes and rules to be "practically enforceable" by the public. The proposed permit recurrently states that records and monitoring/compliance data is kept on-site and is available on request. To comply with Title V requirements, all records and monitoring/compliance data have to be available to the public at the permitting agency or a public repository. How would anyone in Benson easily access this information?

5. The various Operations and Maintenance Plans for the equipment are not due until long after the permit has been issued, so how would the public be able to enforce their requirements or provide meaningful comments? The applicant should know how to operate and maintain their equipment and processes, so this information should be available in the permit. Why is it not?

6. The equipment list shows that most of the equipment to be used is To Be Determined: including all three Hot Baghouses, the Dross House Baghouse, the two cooling towers, and the Lime Silo, which all will have emissions. The equipment list has to state the specific equipment during the permit process, otherwise these determinations are going to be made after the public comment period, which makes the public comment impossible, and this violates the federal requirements. How can the public comment on unknown equipment choices and their emissions?

7. How will the three-hour public hearing time on August 21st be divided up in a way that does not negate the dignity of the concerned publics' efforts, hard work, and participation that is guaranteed by federal statutes?

8. Why are no permits required from ADEQ related to this applicant's waste water disposal?

9. Does the proposed facility have, or will it be required to have, an ADEQ approved Arizona Pollutant Discharge Elimination System (AZPDES) Industrial Stormwater Non-Mining Multi-Sector General Permit (MSGP)? If so, can a copy be provided to us?

10. Will the facility be discharging any process solutions on the site? If so, what is the makeup of the fluid(s), how much and how often will be discharged (volumes), where will they be discharged to (description of facilities (e.g., lined or unlined ponds, storage tanks, etc.) and their locations), and is there any potential direct impacts to the underlying groundwater aquifer(s)?

11. Will the facility be required to obtain and maintain an Aquifer Protection Permit (APP)? If they will be discharging process fluids to the ground without any protection (e.g., lined ponds or tanks) then they should be required to have an APP. If yes, can the ADEQ provide us with a copy of it?

12. Has the company provided the ADEQ with a Best Available Demonstrated Control Technology (BADCT) manual for the proposed facility? If so, can a copy be provided to us?

13. Does the proposed facility have, or will it be required to have, an ADEQ approved Title IV air permit? If so, can a copy be provided to us?

14. Will any process by-products (non-useable or marketable) from process activities be stored at the site? For example, Aluminum Oxide Solids (AOS) material. If so, what is their makeup, proposed volumes, locations of storage, and protection methods of storage from stormwater runoff?

15. The company will have silos (~20 ft beneath ground level) and a melting pit (90 ft beneath ground level) that are at considerable depth underground. How would the shallow water table at this location not be incompatible with these partially underground components of the AD facility? Concerns would be increased risk of flooding, instability, and/or groundwater contamination.

16. Due to the shallow water table and proximity to the San Pedro River, I feel strongly that an Environmental Impact Study should be required for this facility and performed by a third party non-biased entity. We do not want another Apache Nitrogen superfund site situation.

Sincerely,  
Kristin Bidegain  
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