

DONNA ROMAN

As a 17-year resident of Benson, Arizona, I am writing to express my strong opposition to the approval of Air Quality Permit #97894 for the Aluminum Dynamics, Inc. (ADI) aluminum recycling and casting facility planned for Benson. While economic development is important, this project presents unacceptable public health, environmental, and ecological risks that have not been adequately addressed in the permitting process. The public meeting on July 28th that ADEQ held only strengthened my concerns, and this permit should be denied.

****Key Concerns:****

1. Excessive Air Pollution: The proposed facility would emit over 52 tons/year of PM 2.5 (fine particulate) and over 61 tons/year of PM 10 (coarse particulate matter); 93.3 tons/year of volatile organic compounds (VOCs); and more than 100 tons/year of hazardous air pollutants (HAPs), including 92.3 tons of hydrogen chloride. This level of emissions qualifies the plant as a "major source" under the Clean Air Act and warrants heightened federal scrutiny.

2. Community Exposure Risk: Technical analyses indicate that approximately 10 tons/year of aluminum dust will be included in the PM 2.5 emissions. These ultrafine particulates are small enough

to be inhaled deeply into the lungs, entering the bloodstream and posing severe health risks to children, older adults, and individuals with asthma or cardiovascular conditions. The proximity of this plant to the Benson Unified School District, including three schools (just 0.8 miles away according to Google Maps), and the Quiburi Mission Nursing and Rehabilitation Home (0.5 miles away), raises serious ethical and environmental justice concerns. Locating such a high-emission facility so close to Benson's most vulnerable citizens is unjustifiable.

Under ****Executive Order 13045**** (Protection of Children from Environmental Health Risks) and ****Executive Order 12898**** (Federal Actions to Address Environmental Justice), the EPA is obligated to

evaluate disproportionate environmental health risks to children and underserved communities. The ADI facility's emissions, coupled with its location near schools and senior housing, clearly trigger these federal policy standards.

3. Regulatory Gaps: Despite the volume and toxicity of emissions, ADEQ has not conducted a cumulative health risk assessment or any detailed analysis of aluminum-specific particulate deposition. The draft permit does not isolate aluminum particulates from the total PM count, nor does it model or

monitor how these toxins will travel through nearby neighborhoods. These omissions represent a critical failure in environmental and public health due diligence.

****Requested Actions:****

- Deny Air Quality Permit #97894.

- Request EPA Oversight. Due to the scale of hazardous emissions and the vulnerable population surrounding the site, this facility qualifies as a Title V major source under Section 112 of the Clean Air Act. If ADEQ does not initiate federal review, concerned citizens of Benson are prepared to petition the U.S. Environmental Protection Agency to do so. The EPA should fully evaluate this

permit under **40 CFR §70.8** and **NEPA**, with a full risk assessment and environmental justice review.

The citizens of Benson deserve clean air, transparency, and meaningful protection. We urge ADEQ to prioritize public health, scientific integrity, and long-term sustainability over short-term industrial gain.