

Daniel Gillispie

Dear ADEQ Review Board,

Before we even get into technicalities, let's pause on a simple truth: the technologies to dramatically reduce industrial air pollution already exist. Algae-based ponds capture CO₂ from exhaust while remediating heavy metals in wastewater, as demonstrated in 2025 studies on microalgal systems for industrial effluents.

Carbon capture and utilization (CCU) systems turn exhaust into valuable products like synthetic fuels or building materials, with advancements such as LanzaTech's CO₂-to-jet-fuel processes now commercially deployed. Advanced baghouses and scrubbers, paired with continuous emissions monitoring (CEM), keep particulates, hydrogen chloride (HCl), and NO_x out of our lungs far better than outdated EPA Method 9 tests.

So why does this permit contain no attempt to use them—not even an exploration, not even a pilot project? Why is there no comprehensive air quality mitigation plan that incorporates these strategies to meet Best Available Control Technology (BACT) under Title V? Instead, this proposal relies on minimum-effort monitoring and vague equations, while brushing past decades of scientific progress.

The Questions Local Residents Deserve Honest Answers To:

Why is there no comprehensive mitigation plan that evaluates modern controls—algae remediation, CCU, advanced baghouses—before settling for the bare minimum?

Why are residents being asked to accept this project without even the most basic assurances on siting risks—like constructing huge factory buildings in a 100-year flood plain less than one-tenth of a mile from the San Pedro River, where runoff could carry contaminants directly into the watershed? On top of that, the so-called "closed water system" is projected to consume more than 200 million gallons annually, further straining an already declining aquifer?

Take one minute and a deep breath of Benson, Arizona's clean desert air. That breath is what's at stake here. To approve this permit as written is to sentence Benson's residents, travelers along I-10, and future generations to a lifetime of diminished breathing capacity, chronic particulate exposure, and irreversible environmental damage.

I ask ADEQ to not move forward with the permit without first requiring a full air mitigation study. At a minimum, such a plan is necessary to show that the operator intends to follow the principle of the least possible footprint—minimizing pollution, using practical methods to control emissions, and committing to clean up after its own operations. Without enforceable, state-of-the-art mitigation in place, this project should not be approved. I urge ADEQ to require a comprehensive air quality mitigation plan that incorporates known, available strategies—or deny this permit outright.

Sincerely,
Daniel Gillispie
Albuquerque, NM - Tempe, AZ