



# SAVE THE SCENIC SANTA RITAS ASSOCIATION

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**Talking Points:** Air Quality Permit for the Proposed Rosemont Copper Mine

**Situation:** The Arizona Department of Environmental Quality (ADEQ) is proposing to issue Rosemont Copper a comprehensive air quality permit.

ADEQ is currently accepting public comments through October 31<sup>st</sup> and has scheduled a public hearing on this proposed permit:

October 9 – 6:00 PM  
Sycamore Elementary School  
Multi-Purpose Building  
16701 S. Houghton Rd., Vail, Arizona 85641

## Key Issues:

- **The permit is a bait and switch** – The proposed permit is based on a facility configuration plan that is no longer relevant. As a result, the public is being asked to review and comment on an air quality permit for a facility proposal that has been changed significantly.

As recently as August 28<sup>th</sup>, Rosemont's parent company Augusta Resource filed documents with Canadian and US securities regulators outlining significant changes in the proposed Rosemont Mine. These changes will affect the potential air quality impacts of this facility.

**Key Point:** **There will be significantly more air emissions over a longer period of time than was analyzed and addressed by the proposed permit. As a result, this permit is based on information that is now obsolete and as a result should be withdrawn and the updated information about the proposed Rosemont Mine should be incorporated.**

- **Contrary to the notion that government is most effective at the level closest to the governed, the State of Arizona, in response to political pressure from Rosemont, asserted jurisdiction for this permit.** The State said they did so because of a court ruling stating that Pima County acted in an arbitrary and capricious manner. However, that Court ruling dealt only with a narrow procedural issue – Pima County's requirement that Rosemont provide source references for information in their application. In fact, the

Judge in this case gave Rosemont 30-days to provide this information to the County. However, the state short-circuited this process and moved jurisdiction for this permit to ADEQ in Phoenix.

**Key Point:** **Pima County, rather than ADEQ, is the proper permitting agency under the Clean Air Act and the Arizona State Implementation Plan for the issuance of the Rosemont permit. As such, jurisdiction for this permit should be returned to Pima County.**

- **The potential of the proposed Rosemont Mine to emit significant amounts of Hazardous Air Pollutants (HAPs), makes it a major source thus requiring a Class 1 permit instead of the Class 2 synthetic minor permit AZDEQ is proposing to issue.**

The AZDEQ proposed draft permit states that the total annual emissions of hazardous air pollutants (HAPs) do not exceed 3 tons per year. However, Rosemont's own source material (*Baseline Geochemical Characterization, Rosemont Copper*; report by TetraTech dated June 2007) indicates that the Rosemont copper ore contains elements that would be emitted as HAPs in the course of the mining processes (even at a conservative 99% control) at amounts far greater than indicated in the permit. Section 112(b) of the Clean Air Act, clearly states that the emission of these HAPs qualify this project as a major source and require its air quality permit to be a Class 1 Permit.

Potential HAPs that would be emitted include: chromium, lead, arsenic and others.

**Key Point:** **The proposed Class 2 permit should be withdrawn and reissued as a Class 1 permit to better address the HAPs from the proposed Rosemont Mine.**

- **The proposed Rosemont Mine will significantly impact regional Air Quality.** According to the Forest Service Draft EIS, and the Environmental Protection Agency, the proposed Rosemont Mine will violate National Ambient Air Quality Standards (NAAQS) for particulate matter of 10 microns or less (PM10), particulate matter of 2.5 microns or less (PM2.5), nitrogen dioxide (NO2), and ozone (O3).

In the proposed permit, AZDEQ included emission controls and limits in an attempt to address these issues, but provided no evidence that these measures would prevent violations of the NAAQs.

**Key Point:** **The permit should be withdrawn because the speculative modeling and mitigation measures proposed in the permit fail to provide an adequate margin of safety and are**

**unproven, leading to a likelihood that emissions will create an imminent and substantial endangerment to public health through violation of the NAAQs.**

- **Particulate pollution from mining is an especially serious threat to regional public health.** Repeatedly throughout southern Arizona, tailings facilities at existing mines cause significant impairment of air quality, even “white-out” conditions.

Particulate pollution exposure can cause a range of health problems including premature death, increased hospital and emergency room visits for cardiovascular and respiratory problems, and development of chronic respiratory disease. Additionally, particulate pollution emanating from mines contains various constituent contaminants that pose health threats by themselves and are carcinogenic, neurotoxic and teratogenic.

**Key Point: The permit should be withdrawn because it does not adequately demonstrate that it will protect public health from the impacts of particulate pollution from the proposed Rosemont Mine.**

- **Air Quality Impacts of the proposed Rosemont Mine could require other businesses in Pima County to install costly pollution controls.** Emissions from the Rosemont Mine could result in Pima County being designated as a non-attainment area for NAAQs, thus requiring widespread pollution controls throughout Pima County.

**Key Point: The permit should be withdrawn because it does not address the significant adverse social and economic impacts on all or portions of Pima County in the event the air pollution from the Rosemont Mine causes Pima County to become a non-attainment area.**

- **The draft permit does not sufficiently address the fugitive dust from the dry-stacked tailing piles.** The permit does not require a tailings management plan prior to permit approval and thus denies the public the opportunity to review and comment on this plan.

In fact, Rosemont’s own consultant on dry stack tailing say that because these tailings will be dry, they will be more likely to become airborne in the arid desert southwest environment than with the alternative, conventional wet tailings method.

Experience with other mining operations in southern Arizona indicates that mine tailings facilities are a significant contributor to regional air pollution all of which use the conventional wet tailing method.

**Key Point: The permit should be withdrawn and only resubmitted for public comment and review when the tailings management plan for the proposed Rosemont Mine is available.**

- **Particulates from the proposed Rosemont Mine would contain toxic metals that would likely be transported by high wind events from the site to the neighboring communities, including the Tucson metropolitan area.**
- Air Quality Modeling undertaken by Rosemont and relied upon by ADEQ significantly understates the wind velocities that frequently occur in southern Arizona. As result, the potential fugitive dust emissions from the Rosemont are significantly understated in the draft permit.

**Key Point: The permit should be withdrawn because the modeling undertaken by Rosemont and the analysis of this modeling by AZDEQ are insufficient to properly characterize the potential air pollution from the proposed Rosemont Mine.**

- **The Clean Air Act requires the permitting agency evaluate the potential impacts of emissions on visibility in National Parks and Wilderness areas that are designated Class I areas.** Yet the proposed AZDEQ permit does not deal with potential visibility impairment in the Saguaro National Park, a Class I area that is just over 20 miles from the proposed mine.

Saguaro National Park is a significant community resource that attracts over 600,000 visitors per year. Obviously, impairing the scenic vistas will adversely impact the visitor experience and the regional economy that depends on tourism. The Clean Air Act requires that air quality related values in Class 1 areas be protected from significant deterioration. ADEQ has not addressed this in their analysis of emissions from all aspects of the Rosemont Mine.

**Key Point: The proposed permit should be withdrawn and the potential visibility impacts to neighboring Class I areas must be addressed prior to reissuance.**

10/6/12