




**PINAL COUNTY**  
WIDE OPEN OPPORTUNITY

**MEMORANDUM**

**DATE:** APRIL 24, 2020  
**TO:** Board of Supervisors  
**FROM:** Louis Andersen, County Manager   
**RE:** Pinal County Air Quality Permit #B31219.00

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The memo below is in response to concerns regarding the evaporation ponds at Florence Copper. The permit is dated 2/22/18

Section c.4 Pinal County Air Quality Permit B31219.000

4. Materials including solvents or other volatile compounds, acids, or alkalis shall be processed, stored, used and transported in such a manner and by such means that they will not evaporate, leak, escape or be otherwise discharged into the ambient air so as to cause or contribute to air pollution. Where means are available to reduce effectively the contribution to air pollution from evaporation, leakage, or discharge, the installation and use of such control methods, devices, or equipment shall be mandatory.

The permit is rather clear that materials will not be discharged to evaporate into the ambient air as to cause or contribute to air pollution. As you are aware Florence Copper is spraying the contents from their evaporation pond into the ambient air. The purpose of the evaporation pond is to allow the heavy materials to settle to the bottom of the pond and the water molecules to evaporate.

- Again, the permit is clear that the standard evaporation pond is an available means to reduce effectively the contribution to the air pollution from evaporation, leakage, or discharge, the installation and use of such control methods, devices or equipment shall be mandatory. Spraying into the air is not a control method but the opposite, it is a direct injection of unknown compounds into the air.

- Spraying in to the air is a direct violation of the permit and is totally illogical and should be stopped immediately.