



**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
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Tucson, Arizona 85701-1317  
Visit our website at: [www.deq.pima.gov](http://www.deq.pima.gov)

**Ursula Kramer, P.E.**  
**Director**

**(520) 243-7400**  
**FAX (520) 838-7432**

May 12, 2011

**BY CERTIFIED MAIL**

Mr. Jamie Sturgess  
Vice President, Sustainable Development  
Rosemont Copper Company  
P.O. Box 35130  
Tucson, AZ 85740-5130

Re: Request for Additional Information on Rosemont Application for an Air Quality Permit  
(Permit # 6112)

Dear Mr. Sturgess:

Pima County Department of Environmental Quality (PDEQ) staff has completed its initial technical review of Rosemont Copper Mine's (RCM) application for a new mine to be located in Pima County, southeast of Tucson in southeastern Arizona. Pursuant to Pima County Code (PCC) 17.12.165.E.5 the application does not contain all information necessary to continue processing the application. PDEQ requires additional information regarding the technical aspects of the mine processes, specifically a written demonstration that includes calculations showing the control efficiencies for the pollution control equipment (APC) and the proposed limitations for the various processes can be achieved given the proposed technical and operational design of the operation.

When evaluating RCM's proposed pre-construction emission limits in its application, a detailed and verifiable demonstration is required of how these limits will be met upon start-up of the mine's operations. The application only provides the voluntarily accepted limits on the source's Potential to Emit (PTE) so that the source is classified as a Class II synthetic minor. In order for these limits to be enforceable as a practical manner, RCM must provide detailed information that shows the source is designed in a manner that proposed limits can be achieved. This demonstration would include the specific parameters and design calculations such as capture efficiency, flow rates, and manufacturer's specifications for the following APC:

1. Crushing area wet scrubbers
2. Stockpile area wet scrubber
3. Reclaim tunnel scrubber
4. Pebble crusher area scrubber
5. Copper concentrate scrubber 1& 2
6. Molybdenum scrubber.
7. Molybdenum precipitator
8. Laboratory dust collector

The required information shall be provided to PDEQ within 30 days of your receipt of this letter. Pursuant to PCC 17.12.165.E.5, failure to submit the requested information may result in the application being rejected.

Please ensure when replying to this letter that it is accompanied by a statement of truth, accuracy and completeness signed by the responsible official as required by PCC 17.12.165.E.1 and PCC 17.12.160.H. If you have any questions, comments or additions to the application, please call me at (520) 243-7400.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mukonde Chama', with a stylized flourish at the end.

Mukonde Chama, P.E.  
Air Permitting Supervisor

cc: Ursula Kramer, P.E., Control Officer, Pima County Department of Environmental Quality