



January 10, 2024

Mr. Balaji Vaidyanathan
Facility Emission Control Value Stream Manager
Arizona Department of Environmental Quality
1110 W. Washington Street
Phoenix, Arizona 85007

RE: Copper World Project – Class II Air Quality Control Permit Application No. 96659 – Supplemental Model Updates

Dear Mr. Vaidyanathan

This letter transmits updated model results for the Copper World Project (CWP) based on inconsistencies noted in the emissions inventories since responding to the Arizona Department of Environmental Quality (ADEQ) Comprehensive Request for Additional Information issued on August 10, 2023 to Copper World, Inc. (Copper World) for the Copper World Project (Project). Copper World responded to this request on October 31, 2023. Since that submittal, two inconsistencies were noted in the emissions inventory files. These inconsistencies included:

- Correction to the CAT 660 shovel engine type tier rating (corrected to Tier 4)
- Conversion calculation error related to Santa Rita Road (PM_{2.5} and NO_X sources were in units of ton/yr*ft² instead of lb/hr*ft²)

These inconsistencies were corrected, and the affected models were also rerun. No other changes were made. Updates to affected sections of the model report and other associated application documents are also provided based on the updated model results.

Please do not hesitate to contact me at (520) 495-3527 (office), (520) 260-3490 (cell) or via e-mail at david.krizek@hudsonminerals.com if you have any questions regarding this submission.

Sincerely,

David Krizek, P.E.
Senior Manager, Environmental & Permitting

Attachments:

Attachment 1: Revised AERMOD Modeling Report v1.0_Compiled. Copper World Project.
January 2024.

Attachment 2: Revised Appendix F of the October 21, 2022 “ADEQ CLASS II PERMIT – Permit
Application”. January 2024.

Doc. No. 003/24-15.5.7.2