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Bulk Propane Terminal Danger

Bulk Propane Terminal Danger to Life

Additional submitted attachment is included below.

Date:
November 9, 2026
To:
California Energy Commission (Docket Unit, MS-4, Docket No. 26-SPPE-01)

Subject: STATUTORY CEQA COMPLAINT: Invalidation of Sound Baseline Data, Underground Electrical Discharge Pathways, and Omission of Adjoining Bulk Propane Terminal Dangers for Docket No. 26-SPPE-01

To the Lead Agencies,
This formal filing provides specific, objective engineering, safety, and geographical facts establishing that the current environmental documents submitted for the proposed 99-megawatt RB Inyokern Data Center project are legally deficient under the California Environmental Quality Act (CEQA).
The applicant's documentation relies on an unverified, incomplete sound assessment that creates an environmental blind spot, while entirely omitting severe operational and structural threats to an adjoining bulk hazardous facility.

1. Factual Invalidation of the Baseline: The dBA vs. dBC Measurement Scale

- **The Regulatory Loophole:** The developer’s filings utilize the A-weighted decibel scale (dBA) [Title 8, §5096]. This scale mimics mid-to-high human vocal frequencies but intentionally filters out and discounts low-frequency sound waves below 500 Hz.

- **The C-Wave Reality:** The project's continuous-cooling fan walls and 40 separate 3-megawatt emergency diesel generators generate non-stop, low-frequency sound pressure waves. Measuring this raw physical pressure requires the **C-weighted (dBC) scale**. A site tracking a legal baseline of 55 dBA can simultaneously register a bone-rattling **75 to 80 dBC**.
- **The Permissible Exposure Limit (PEL) Disconnect:** Cal/OSHA's legal 8-hour shift limits are calculated strictly on the dBA scale. Consequently, an area reading a legally "permissible" 80 dBA allows an employee to work an unlimited shift, even if a concurrent **100 dBC C-wave** is present. A 20 dB disparity means the physical atmospheric pressure wave hitting the human ear is **100 times greater** than the legal dBA metric reports.
- **Failure of Personal Protective Equipment (PPE):** Standard foam earplugs and commercial earmuffs rely on a Noise Reduction Rating (NRR) calibrated for dBA settings. **Low-frequency C-waves bypass foam barriers via bone conduction—vibrating the jaw and skull bones directly into the inner ear—rendering standard workplace PPE ineffective.** [Title 8, §5098]
- **The Acoustic Masking Effect:** Continuous C-weighted industrial noise blankets wide structural zones and creates a masking effect that swallows mid-and-high-frequency sounds. **This drone drowns out human vocal calls for help and blocks the audibility of standard building evacuation sirens or emergency alarms.**

- **The Indoor Standing Wave:** While high-frequency sounds quickly scatter in open desert air, low-frequency C-waves travel miles with minimal atmospheric resistance. Standard building materials (drywall, stucco, glass) lack the structural density to absorb them. **When entering nearby structures, these long waves bounce between parallel walls, creating a resonant "standing wave" that traps and amplifies the deep physical drone inside private residences (within 1,000 feet) and Inyokern Elementary School (Located at 6601 Locust Street, Inyokern, CA 93527, within roughly 2,000 feet of the project site).**

2. Omitted Public Safety Hazards: Adjacency to Suburban Propane Bulk Terminal

The developer's environmental review treats the surrounding perimeter as an empty, generic industrial zone. It completely omits the physical presence and operating conditions of the **Suburban Propane bulk storage and dispatch complex located at 1354 N. Brown Road, Inyokern, CA 93527**, which sits directly adjacent to the data center's property boundaries.

- **Sympathetic Structural Resonance:** Propane terminals utilize pressurized steel bulk storage tanks and high-pressure delivery piping. **Continuous C-wave sound pressure waves from the data center's 24/7 cooling infrastructure can trigger sympathetic resonance if the frequencies match the natural resonant frequency of the steel tanks, causing structural weld fatigue and anchor bolt degradation over long-term**

exposure, leading to a catastrophic containment failure at 1354 N. Brown Road.

- **Safety Sensor Blinding:** The automated monitoring systems at the propane complex utilize sensitive electronic acoustic and ultrasonic sensors to identify pressurized gas leaks. **The continuous C-wave drone from the data center will blind and distort this security instrumentation, masking low-level gas escapes and delaying automated emergency shutoff sequences.**
- **Electrostatic Discharge (ESD) Risks:** Inyokern routinely experiences extreme aridity (relative humidity dropping below 20%). The data center's cooling infrastructure acts as a massive dry-air and heat rejection engine, continuously blasting a hot thermal plume toward the neighboring propane loading docks. **This localized dryness accelerates static electrical charge accumulation on ungrounded metals and fuel transfer lines, creating an immediate ignition risk for volatile propane vapor during transfer operations.**
- **Underground Electrical Discharge and Ground Potential Rise (GPR):** The data center's 115 kV electrical substation and forty metallic generator stacks create a dense lightning rod grid in a flat basin prone to dry lightning storms. If a massive electrical fault or lightning strike occurs, thousands of amps are forced into the ground. Because the dry Inyokern desert soil resists immediate dissipation, **this underground current builds a massive voltage surge that radiates outward through the earth toward the propane property line, seeking the path of least resistance.**

- **Arcing, Sparking, and Flashover:** As this underground electrical wave hits the propane facility's highly conductive metallic infrastructure, **the ground voltage will surge up into the propane tanks, loading racks, and steel piping. This introduces a severe risk of electrical flashover or arcing between metal gaps (such as fuel hoses and delivery trucks), providing a direct, high-energy ignition source inside an explosive vapor zone.**
- **Instrumentation and Safety System Blowout:** The influx of an unmitigated underground electrical surge from the data center through the soil will **instantly fry the propane facility's electronic safety systems, delicate pressure sensors, and low-voltage cathodic protection loops, rendering the entire facility's automated leak-detection and emergency controls completely useless.**
- **Acoustic Shouts Masked During Industrial Accidents:** If a physical valve failure or pipe rupture occurs during bulk propane fuel-truck loading, **the dominant data center C-wave drone will completely swallow a worker's verbal distress call or shout for help. It will similarly mask the critical, high-pitched "hissing" warning sounds of a failing valve gasket, blocking technicians from executing manual safety overrides before an arc, spark, or ground surge triggers a Boiling Liquid Expanding Vapor Explosion (BLEVE).**

3. *Theoretical* Blast Radius and Public Safety Overlap

If unmitigated environmental vectors trigger an industrial accident at the 1354 N. Brown Road propane complex, the resulting explosion risks catastrophic, life-threatening impacts to the immediate public sector:

- **The Fireball Zone (0 to 300 Feet):** Any containment breach during high-pressure liquid transfer generates an instantaneous thermal fireball. **This direct, lethal thermal radiation zone covers the immediate Brown Road corridor and directly intersects the proposed data center property line.**
- **The Projectile and Shrapnel Radius (Up to 0.5 Miles / 2,640 Feet):** A pressurized structural vessel failure rockets steel tank shrapnel through the air. **Both the active proposed data center campus and Inyokern Elementary School (6601 Locust Street) sit entirely within this high-velocity lethal projectile impact zone.**
- **The Mandatory Public Evacuation Radius (Up to 1 Mile / 5,280 Feet):** Pursuant to NOAA and National Evacuation Guidelines (ERG Guide 115) for large bulk storage terminal fires, a 1-mile emergency safety perimeter must be enforced. **This multi-mile blast and evacuation zone completely blankets the downtown core of Inyokern, cuts off the US-395 transportation corridor, and directly mandates the forced evacuation of hundreds of local desert households.**

4. Unmitigated Hazards of 600,000-Gallon Bulk On-Site Diesel Fuel Storage

The data center project application requires storing up to 600,000 gallons of bulk diesel fuel across six 100,000-gallon above-ground tanks to supply its emergency generation grid. This massive, hazardous chemical footprint creates unstudied domino effects:

- **The Fuel-to-Gas Vapor Domino Effect:** If an environmental ignition vector triggers an explosion across the street at the Suburban Propane terminal, the resulting overpressure wave and thermal blast will strike the data center's storage infrastructure. **Shrapnel and extreme radiant heat from the neighboring propane fire risk structurally breaching the data center's bulk tanks, triggering a secondary, massive industrial liquid chemical fire that would burn unchecked for days and blanket the high desert in toxic particulate matter.**
- **Vibrational Weld and Piping Fatigue:** The data center’s cooling loops produce continuous, 24/7 low-frequency pressure waves (C-waves). **This unceasing mechanical vibration exerts continuous acoustic stress on the data center's own bulk fuel piping manifolds, valves, and tank seams, inducing micro-fractures in fuel line weld joints and causing structural pipeline failures.**
- **Subsurface Environmental Failure and Aquifer Poisoning:** If a structural fuel line or tank seam ruptures, hundreds of thousands of gallons of diesel fuel will discharge straight into the highly porous, loose sandy soil of the high desert basin. **Once diesel sinks into the permeable desert alluvial gravel, it paths rapidly downward, causing**

irreversible, catastrophic chemical contamination of the <u>Indian Wells Valley groundwater basin—the exact, critically overdrafted aquifer that provides the entire domestic drinking water supply for local households and Inyokern Elementary School.</u>

Formal Demands Under CEQA Guidelines

Under CEQA, a Lead Agency cannot certify an environmental assessment when substantial evidence points to an unstudied, significant risk to human health or public safety. We formally demand that the California Energy Commission and Kern County:

1. **Deny the Small Power Plant Exemption (SPPE)** and mandate a full, non-streamlined Environmental Impact Report (EIR).
2. **Order an independent, third-party acoustic study** utilizing mandatory, dual dBA and dBC modeling paths to map indoor, outdoor, and structural low-frequency distribution across the residential zones and the adjacent propane terminal.
3. **Mandate a full Hazard and Operability (HAZOP) risk assessment** utilizing comprehensive electrical earth-ground modeling to evaluate the intersecting electrostatic, seismic, and Ground Potential Rise (GPR) lightning ignition vectors acting upon the neighboring bulk hazardous materials.

Sincere Stakeholder, Ratepayer, Taxpayer and Concerned Citizen,
Bonnie DeRosa