

DOCKETED

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Stormwater and Air Quality Concerns

Good afternoon

Firstly in reviewing the document you have not analyzed stormwater sufficiently. There are Total Maximum Daily Loads for three pollutants in this watershed that are currently being incorporated into the Industrial NPDES Permit for the area. Based on the initial information, it does not look feasible that your plant could meet 80-100 mg/l for chloride. It will need to be reverse osmosis treated, with the brine hauled by truck because the local sewage treatment plant can't meet the limit. This also increases the GHG and energy and noise and wastewater elements of your plant documents. A link to the proposed action is below:

http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/sw_index.shtml

Secondly, we live upwind of this plant. I am very concerned at already elevated ozone levels in hot summer afternoons. Your plant will exacerbate that. We are already under higher particulate matter pollutant because of gravel mining and industrial processes in our air shed. Your proposed mitigation are insufficient to meet air quality limits in the upwind locations already struggling.

Third, you say that the jobs will be locally hired. There is no plan or binding agreement to allow this. Please clarify how you will direct the human resources department to actively solicit employees from the area and give preference to local hired (i.e. within 5 miles of the plant)

Fourth, you should be helping to manage the discharge problems with Santa Paula and other local sewage treatment plants. Limonera agricultural water is not helpful enough. Also, you should be offering to take the sewer gas collected by the sewage treatment plants in Piru, Santa Paula and Fillmore to offset their costs and provide benefits.

These are low income communities, please don't take advantage of them. If you are going to be a neighbor, start now with being an excellent neighbor.