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<th><strong>Docket Number:</strong></th>
<th>08-AFC-08A</th>
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<td><strong>Project Title:</strong></td>
<td>Hydrogen Energy Center Application for Certification Amendment</td>
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<td><strong>TN #:</strong></td>
<td>200637</td>
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<td><strong>Document Title:</strong></td>
<td>Kaye Comments: Opposition to HECA Project</td>
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Comment Received From: Kaye
Submitted On: 9/30/2013
Docket Number: 08-AFC-08A

Opposition to HECA Project

Additional submitted attachment is included below.
Valleymar Dist.

Are you people crazy? How could you possibly think of allowing this HECO plant to come to our valley? We have the worst air in the nation and we don't need any more pollution!

That is a coal plant. We have no coal in California. Why do they have to tear it out here? I understand there will be truckloads of coal coming from New Mexico up highway 99 and on 119, the most dangerous one lane road around.

Why don't this Michigan outfit build it in New Mexico or in Michigan where they have LOTS of wind?

Why would they want to build the plant in California and haul coal from New Mexico? Think about it. That is INSANE!

Someone will be making a lot of money on this. I can't think of ANY other reason. The people that live here will pay the price for the pollution - especially the school children. I think we should demand the law suits over this!

I urge you to vote NO on this vital pollution for our valley.
THE STUDY
The San Joaquin Valley air district has approved a $99,747 contract with UC Davis for an 18-month analysis to determine if ozone from Asia, namely China, is mixing with valley air.

WHAT IT MEANS
If the study’s findings help prove that valley pollution violations are a result of so-called trans-boundary ozone, the air district should be able to make a case against the EPA’s annual $20 million smog penalty.

It was no pleasure flight. The plane soaring over Bakersfield in one of the most polluted air basins in the nation was on a scientific mission.

The men on board were searching for smog — and it wasn’t hard to find.

Attached to the wings of the single-engine Mooney TLS were plastic inlet pipes that sucked air through scientific equipment loaded into the rear of the plane.

The equipment, which can detect levels of ozone, or smog, in parts per billion, was wired to a computer resting on the lap of the plane’s passenger. The laptop showed a fever chart — a graphical representation of ozone levels — in real time.

"Yesterday we got what we came for over Arvin," said Stephen Conley, an atmospheric scientist from UC Davis, who was at the controls of the plane. "We detected 112 parts per billion at 1,000 feet above the ground."

Find that extreme level of ozone dipped to the surface and been detected by an official ground station near Arvin, it might well have triggered an exceedance, or violation, of the federal one-hour ozone standard of 75 ppb by volume.

Residents on this end of the valley have known for years that we live in an ozone nightmare, a hazy lung-
OZONE: Up to 23 percent may be coming from China

Stephen Corley, an atmospheric scientist at UC Davis, flies over the southern San Joaquin Valley as part of an 18-month study on the movement of ozone pollution.

County one-hour ozone exceedances

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<td>Kern County (no exceedances 2011-13)</td>
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Source: San Joaquin Valley Air Pollution Control District

WHAT THE AIR ACT SAYS

Actual wording from the federal Clean Air Act regarding a possible exemption for offshore ozone:

"Notwithstanding any other provision of law, any State that establishes to the satisfaction of the Administrator that, with respect to an area nonattainment area in such State, each facility would be covered by the national ambient air quality standard for ozone by the applicable attainment date for the area, the Administrator shall, after consulting with the State, within 12 months after the effective date of the Clean Air Act Amendments of 1990, propose a plan to achieve such standard, and the plan shall be submitted to the Administrator for approval or disapproval within 12 months after the proposal is submitted."

The data indicate that the ozone concentrations in the San Joaquin Valley are indeed very high, and that the majority of these exceedances are due to emissions from off-shore sources.

Guaranteed to fail?

In 1988, the valley portion of Kern County exceeded the federal one-hour ozone standard 19 times. From 2011 to the present, there have been zero exceedances in Kern Valley, despite more than 100 additional observations.

The Clean Air Act does not guarantee that the valley will remain below the standard. If it does, the valley may be subject to even stricter regulations.

The county of Kern, which has a large agricultural industry, is not alone in experiencing high ozone levels. The entire San Joaquin Valley is subject to similar conditions.

The significant decrease in exceedances is likely due to a combination of factors, including changes in agricultural practices, improvements in emission control technologies, and increased public awareness.

The data suggest that the valley is beginning to see improvements in air quality, but more work needs to be done to ensure continued progress.

In conclusion, the Clean Air Act provides a framework for addressing ozone pollution, but it is up to the states and localities to implement effective strategies to meet the federal standards. This includes adopting tougher regulations, increasing enforcement, and promoting public education.

The data indicate that the valley is indeed taking steps to improve air quality, but more needs to be done to ensure continued progress.
Kids deserve better than HECA

I'm writing about Hydrogen Energy California, or HECA, and its polluting effects on health. I am a registered nurse and Bakersfield is my hometown. My physician husband did his internal medicine residency in Bakersfield.

We know about the extreme bad air in Kern County. Studies show that polluted air contributes to the difficulties of lung disease. We are familiar with patients who suffer from respiratory problems, having treated asthma, chronic obstructive pulmonary disease, emphysema, and a host of other lung diseases. The tons of emissions from HECA will certainly add to their health risks.

Have you witnessed an asthma attack? Patients struggle with severe shortness of breath, uncontrollable coughing, wheezing, and tightness in the chest. Obviously, these lung sufferers cannot fully enjoy life. Moreover, lung disease can shorten life. The Los Angeles Times reported on Aug. 26: “Health studies show that the most vulnerable are children whose developing lungs can be harmed for life by air pollution.”

The location for HECA is wrong. Already Kern has a higher asthma rate, higher asthma emergency hospital visit rate and higher death rate from asthma than the state as a whole. These health risks will only be multiplied by the added emissions of hundreds of diesel delivery trucks and fertilizer production from coal. If there is an elementary school only 1.5 miles downwind from the HECA facility, you must consider the long-term consequences of their exposure. The kids deserve better. Don’t let this happen.

Why is the valley punished?

Regarding Richard Beene’s Sept. 2 Bakersfield Observer blog item referencing the pollution article by Steven Mayer (“Valley air pollution: made in China?” Sept. 1): What is the remedy here to stop the EPA and the California Air Resources Board from extorting money from the valley residents?

They set arbitrary standards that are constantly altered so as to keep us in violation mode, and there is nothing outside of a complete shutdown to remedy their punishing actions.

Chinese ozone and particulate pollution has been brought up before. The government built highways 5 and 99 through our valley for traffic between Los Angeles, Sacramento and the Bay Area, yet they bear no burden for all of their pollution.

The same is true of the Bay Area air pollution blown into our closed valley. What are they wasting their $29 million on every year? Maybe they should spend it on giant fans to blow the pollution over our southern mountain range.

Air district board making side deals

The good old days system is alive and well. The San Joaquin Valley Air Pollution Control District’s public comment period on the Preliminary Environmental Impact Report of the proposed Hydrogen Energy California facility project is a sideshow. The public comments are not binding, and the board is not bound by them. It is a public relations scheme. The public comment period is a sideshow used to give the appearance of public participation. The public is not part of the public process. The public comments do not have the force of law.

The HECA fertilizer manufacturing project is part of the California Energy Commission’s net power generation project. The project can be built with public money. The public comment period is a sideshow used to give the appearance of public participation. The public comments do not have the force of law.

What are our kids breathing?

In this Sept. 11 letter, “We’re longing for our kids to be monitoring the air,” man Harold Hansen wrote: “Worse, we are allowing our kids to be monitoring the air. We are long overdue in recognizing this fact and working to prevent it.” It is time to reverse course. Let’s start by changing the air district’s rules and regulations and reducing emissions from the project.
Tell the CEC what you think about being HECA’s guinea pig

Chris Romanini

More bad news about HECA. What began as a power plant proposal has changed. HECA, or Hydrogen Energy California, is now a chemical/fertilizer project that produces a little electricity for the grid. We should be outraged the federal government would assist HECA with over $500 million of our tax money to help fund a for-profit chemical company fueled by 80 daily trucks of dirty coal and refinery waste— in the dirtiest air in the nation. And it is proposed on beautiful prime farmland surrounded by fields producing food crops in Buttonwillow.

We learn from the California Energy Commission’s preliminary staff assessment that although HECA will produce somewhere around 415 MW of power, it will use up most of this power itself making chemicals and sequestering CO2 underground. And what power is left for us folks who helped finance this test project? Just 52 MW—maximum to the grid. Power like this we don't need. Kern County has already permitted over 8,000 MW of clean, renewable power in the form of wind and solar. We are the good guys of the state. No county is doing a better job of producing clean, renewable power than Kern. Now we are rewarded with a dirty coal plant that would produce a tiny amount more.

And what about the CO2 HECA would be pumping underground at high pressure? Have you heard of Denbury, Miss., where the CO2 came back up? It ate through the old, sealed well coverings and spewed for 37 days. It was so toxic the responders had to wear breathing masks. This stuff hogs the ground. Poor Tupman is downhill from Occidental Petroleum’s Elk Hills target for its sequestered CO2, so if the CO2 eats through one of Oxy’s old wells, it will likely flow downhill to Tupman or Buttonwillow. Oh yes, the CEC concluded that the CO2 will cause seismic activity. Should we be relieved that it is not expected to exceed a magnitude 4 earthquake?

And what about these chemicals and fertilizers they are making? How hazardous is it to Tupman’s school only 1-1/2 miles downwind? HECA will make 1 million tons per year of urea, urea ammonium nitrate and anhydrous ammonia. This stuff is dangerous and explosive. It only took 30 tons of fertilizer in West, Texas, this past May to kill 15 people. HECA will make almost 3,000 tons of fertilizer per day, not just 30. How destructive can 3,000 tons be?

And what does the CEC have to say about the potential for accidents? This “Staff has not encountered such a complex power facility in the history of the Energy Commission. The CEC’s staff analysis casts serious doubt that this project will be 100 percent free of upsets or accidental releases of hazardous material” and leaks “are prone to happen.”

This is a demonstration project. It has not been done anywhere else in the world. There are 42 other worldwide projects in planning stages to capture and sequester CO2 from coal, but none are in operation. And all but one are smaller. HECA is an experiment. Advocates may learn how to do it safer through mistakes that happen in this test plant. We will suffer the consequences as they learn.

The CEC and the federal Department of Energy are holding a public hearing in Buttonwillow on this project. Public comments will be heard Sept. 17 and 18 between 6 p.m. and 8 p.m. in the Buttonwillow Park Recreation Center. We in Kern have the dirtiest air in the nation. Pollution increases health risks. Kern ranks among the lowest in California for overall health. The mortality rate for asthmaics in Kern County is higher than the state’s overall rate. Valley Fever appears to be on the rise in Kern. How outrageous that we, at the closed end of Central Valley, with no escape for the emissions and fumes, are chosen to test a cleaner way to process dirty coal, and we don’t even have coal in our state.

Come out to Buttonwillow and voice your concern. Comments are encouraged at docketenergy.ca.gov.

Chris Romanini and her husband, who farm as John Romanini & Sons, produce almonds, pistachios, and cotton. Along with their sons they have been farming in the Buttonwillow area for four generations. Community Voices is an expanded commentary of 650 to 700 words.