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**From:** mark romanini [mailto:markromanini@gmail.com]**Sent:** Wednesday, August 15, 2012 3:15 PM**To:** Jennings, Jennifer@Energy**Subject:** HECA Comments

Dear Mr. Pozzuto

Thank you for the opportunity to voice our concerns regarding the proposed HECA plant.

As we know, the San Joaquin Valley's bowl shaped topography and consistently stagnant weather patterns exacerbate the formation and retention levels of air pollution, primarily in the form of ozone and PM2.5. The prevailing air patterns shove these pollutants to the southern end of the valley making Bakersfield the most challenging city in the country to reduce these toxins within. As new studies and research continue confirming the negative health impacts from these pollutants, the EPA has proposed making the National Ambient Air Quality Standards for ozone and PM2.5 even more stringent.

The San Joaquin Valley Air Pollution Control District documented in its 2011 annual report that: Bakersfield exceeded the 8 hour ozone standard 69 times and the PM2.5 standard 28 times for a total of 97 unhealthy air days or essentially 25% of the entire year. Under the EPA's newly proposed guidelines, these numbers would have been 94 and 61 respectively for a total of 155 unhealthy air days or 42% of the entire year.

The primary toxic pollutant responsible for the ozone and PM2.5 deterioration levels in the valley is NOx and the primary source creation is from vehicle emissions. HECA's proposed project and site location will contribute substantially more NOx in an area that can't handle today's levels. The DOE's financial support of this "green" technology seems to overlook the true footprint of this project. Sequestering 3 million tons of greenhouse gas emissions in an area that has the worst concentration of ozone and PM2.5 in the entire country seems like a blatant disregard of the true air quality conditions the citizens of Kern County struggle with daily.

This project not only sits upon prime farmland but is also surrounded by it. It also will consume over 7,000 acre feet of brackish water a year that could be used to grow salt tolerant crops such as pistachios or cleaned up and provide water to over 17,000 households (one acre foot of water will provide enough water for 2-3 families for an entire year).

Why not employ the best available technology that maximizes the strength of an area and minimizes its negative impacts? Adding hundreds of tons of toxic pollutants into our compromised air basin doesn't accomplish that goal nor does losing prime farmland and the most precious resource in the state today, water. Marginal land and abundant sunshine are attributes of the county that are underutilized today. Where is the consideration for solar to meet California's energy goals and needs? It appears to be a much better fit.

How many trucks will be arriving and departing from this facility daily at full operation?

Please show the total tons of emissions the plant will generate at full operation.

Please show from the point of origination, total truck and rail emissions during full operation.

All of these seem to be ambiguous and moving numbers.

Finally, who is the neutral oversight party in regards to emissions and what enforcement powers will they possess?

Thank you again for your consideration of our concerns.

Sincerely,

Mark Romanini