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Comments on SCS Energy's HECA project in Tupman, CA  
From land owners near the proposed project

Docket 08-AFC-8A

July 26, 2012

**Brackish Water** What is HECA's definition of brackish water? Let's see figures. At what point is brackish water no longer brackish and is now better water? If the water is no longer brackish, will HECA have to STOP draining our precious ground water? At a thirsty 4600 to 5150 gal/minute for 20 or 30 years, will our ground water suffer? What studies are being done to predict how underground water will move to fill the void from the brackish pumping? What are the safe guards to compensate well owners whose water declines in quality and/or depth? What studies are being done to identify how blending of water can improve it to a point that it is useable? Are studies being done to show which crops can be productive on saltier water? If it is usable for crops, should HECA be allowed to use it for industrial purposes? Show your figures on what level the water must be before no local crops can use it.

**Contaminated Ground water.** What if the unforeseen happens...a problem with their pipes, an unknown fault, a spill, and explosion or accident? Will our ground water be contaminated? Is it possible to correct contaminated groundwater? Wells supply homes very near HECA. What is the protection?

**Onsite wells.** What is HECA doing with the water wells that are within their 1000 acres? Will they cap them off and seal them so no chemical spills or accidents can leak through them to our ground water? What is your knowledge of their abandoned domestic or irrigation wells and how they were capped? Old wells could be unrecorded.

**Risk to Prime Farm Land.** Justify the reason to risk our livelihoods with a sequestration plan on a scale that has never been conducted in the US before? The CEC states in their July 12, 2012 Issues Identification that they do "not have the necessary technical expertise in house to develop and implement this program and will largely rely on consultants" to do the job. That is scary. What is the procedure for selecting and monitoring the consultants? Who would they be?? Justify the risk we must endure at the hands of consultants who would be developing a program ... maybe to refine it after they see the errors they made at this first attempt?

**Williamson Act.** This land is under contract. Where is the justification for cancelling this contract for a chemical plant or even a power plant? Where is the offset for the replacement of prime farm land? And where will you find replacement prime land

that is as “green” as this land, where district water delivery is largely natural flow of canals, not by pumps?

Air: Facts....Kern has the worst air in the nation. Polluted air causes health issues. Should the DOE encourage a demonstration project that will further pollute our air in the interest of global warming? Should not the DOE consider the effects on our LOCAL environment, first? A small issue is the discretionary decision by local schools that restricts outdoor sports and PE for students when AQI is above 201, 151, and even 101. When HECA cranks up, will their “stuff” have the children sitting in the gym even MORE? And will health risks increase? HECA’s figures and tables on emission are difficult to add up. Please state the TOTAL PM 2.5, PM 10, NOx, and SO2 emissions per year HECA will produce. These figures should include both plant (power and chemical) and vehicle (rail and road).

Contaminated crops We are a farming area. The threat of contamination from the chemicals , the gasification and trucking is alarming. Accidents happen. If the consumer learns Buttonwillow’s crops are contaminated, will that affect our market? Please identify how many jobs and how much in sales we could lose in pistachios, almonds, grapes, wheat, alfalfa, and tomatoes. All are grown very near HECA.

Traffic: A huge increase in heavy duty trucks on our small country roads. Who will manage the road surface? Who will prevent huge clouds of dust from the unpaved shoulders from contaminating our crops every time a single truck goes by? What background checks will be conducted on the truck drivers? How closely will they be monitored?

Rail Can’t imagine a train blocking Stockdale Hwy nor cutting through pistachio fields and other crops. Please keep the public comment period open until a reasonable amount of time after a rail route is announced. HECA needs to identify the rail spur so we can comment in an intelligent way, and the DOE needs to hear its impact before making decisions.

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CEC Issues Identification Report: Looks like the CEC has missed some issues. Their chart on page 5 says CEC has NO MAJOR ISSUE with the following:

1. Land Use (But it needs a zone change for a chemical factory. And this is prime farmland and it will put neighboring prime farmland at risk.... Plus it is in the Williamson Act).
2. Hazardous Materials (ammonia nitrate, for one. And what is in the coke?)
3. Socioeconomics (How about the threat to neighboring farmland and crops?)

4. Public Health (Polluted air causes major health problems. The addition of HECA's pollutants will further compromise our health. )
5. Worker Safety and Fire Protection (No way could Buttonwillow's fire department handle an explosion or fire. Is HECA planning worker safety training for farm workers with emergency evacuation training and procedure?)
6. Efficiency and Reliability: (Isn't this a demonstration project?? A test? On this scale does anyone know how reliable it will be? Do you already know the efficiency? Please determine how expensive it is to make their power, chemicals, and fertilizer. Could HECA be profitable without government help? )
7. Alternatives (How about NO coal gasification as an alternative, or change to natural gas?)

The point...The CEC is an expert in ENERGY. But they may be out of touch with our local issues. If they have missed what is obvious to those with boots on the ground, could they miss issues in the technical areas we don't understand? The Kern County Planning Dept. has extensive experience in oil related issues, farming issues, water, hazardous waste, and chemicals. Shouldn't Kern County be permitting the land use, zoning, chemical plant, and all that is not the ENERGY portion of this process?

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Conclusion: Don't invest the DOE's money in this location. Certainly there is a suitable site to "test" and perfect their ideas, closer to the coal source.

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