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Sent: Wednesday, April 17, 2013 3:22 PM
To: Worl, Robert@Energy; Energy - Public Adviser's Office; leonard.scandura@valleyair.org
Subject: PDOC- A threat to the San Joaquin Valley

To:CEC and SJAPCD regarding HECA

From: Trudy Douglass

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There is no way that the CEC, SJVAPCD, or HECA can accurately predict pollution emissions because there are no parameters set for the quality of the feedstock or the natural gas to be used. HECA is waiting for the vendors to tell them what the PM10, PM2.5, VOC, and SO2 will be. It seems to me that clearly prescribed limits on levels of mercury, sulfur, lead and other know contaminates would contribute to making HECA a cleaner gasifying factory. Keeping low-grade or adulterated levels of coke, coal and natural gas out of the feedstock will reduce pollution emissions. A system for documenting and testing for compliance should be part of the PDOC and CEC plan.

In analyzing the background ambient air quality of the valley the huge Buttonwillow Safe Harbor dump, I5, and Highway 99 were left out. These sources are not picked up by the Shafter monitor. I believe that I5 and Highway 99 should be included because they are both stationary and a constant source of emissions.

Will sulfur or sulfur dioxide be released at start-up, shut-down or when flaring? A violation of District Rule 4102.

How are the emissions from the three flares burning natural gas 24/7 while on stand be accounted for in your pollution estimates?

Where are the 95,500 gallons per minute of “higher-purity water” for the CCW exchanger in the cooling tower coming from?

How often will the CEMS undergo calibration, audits, and testing? What is the CEMS’s margin of error?

How much mercury is expected to be captured? What will be done with it? Will it be put in a toxic waste site or have some practical use?

Are there going to be sound level maximums on the equipment that will load, unload and grind the coal and coke?

What will the noise and lights running 24/7 do to the residents and animals in the area?

What is the projected ambient temperature of the factory site for each of the seasons of the year? What humidity levels can be expected?

What particulate size are the baghouses on all dust suppression systems be expected to retain?

SJVAPCD seems to believe that particulates PM10, PM2.5. and smaller can be released into the air without any consequences to valley residents' health. These particulates will be streaming from almost every ground level operation in the HECA factory: loading, transporting, unloading, grinding, blending, drying, conveying, and storing. They will come from every material brought in or manufactured: coal, coke, urea, sulfur, ammonium nitrate, waste and products. Even in the gasification process, HECA assumes that the sub-micron range from it's stack will be PM10 but they could as well include PM2.5 particulates. PM10 and PM2.5 will have an emission rate of over 170 tons a year. The district is selling out our valley's air at a bargain price. They are accepting HECA's plan for interpollutant trading of SOx emissions for PM2.5 emissions at a 1:1 ratio. EPA has recommended up to a 40:1 ratio. San Joaquin Valley officials are cheap and easy.

The SJVAPCD has sited several areas for dust and particulate suppression, capture and monitoring, all are to be inspected quarterly. This is not acceptable, it should be done monthly. Also it must be mandatory that any employee, who sees a problem in an area of particulate suppression, report it immediately, have the equipment shut down, and fixed.

The people who live in and work in the area surrounding the HECA factory need protection. $50,000,000 should be set aside to track the air quality related diseases of the Tupman residents and farm personnel in the area. A baseline of all area residents and workers should be taken before construction starts and annual follow-up should be done until the land is fully restored after HECA is closed down. Treatment for identified ailments will be paid for as they manifest, even beyond the original $50,000,000. The people of Tupman are afraid with good reason because this gigantic factory will endanger their futures.

There are many sites in the HECA factory that have monitoring equipment but information on all emissions will not be collected, for example,PM2.5, SO2 and VOC. It seems to me that it would be simpler to combine all the emissions that the factory is generating by placing air quality monitoring equipment on the grounds of Tupman School. Tupman residents can know what they are breathing and be warned in case of "Fugitive Emissions" at the factory.

In looking over the Kern County Planning Department's recommendations, the Kern County Fire Department lists several hazardous and toxic products with flammable characteristics and the potential to produce large quantities of dense, black, toxic smoke. The fire personal will wear the best haz-mat protection there is when responding to a disaster at the HECA factory. But, the people of Tupman, 2 miles distance, and the farmers and workers in fields, even closer, will be in life-threatening danger and have **no** protection. A comprehensive plan to supply equipment, training and an early warning system to notify these residents must be included in the CEC plan. An automatic system that does not rely on HECA to activate it is needed.

Every chemical factory in the last 150 years has become a toxic waste site. Make a land restoration exit plan the cost of HECA doing business Kern County. A $200,000,000 bond or trust to insure that the land will be returned to its currant condition. The last owners of HECA won't be able to declare bankruptcy, abandon the site and walk away.