

## DOCKETED

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## **HECA, railcars, and high-speed rail lines**

From: Trudy Douglass

To: CEC

08-AFC-8-A

I want to bring to your attention the public's concerns about coal transportation emissions. In meetings with the San Joaquin Valley Air Pollution Control Board, whenever this issue was brought up, the speakers were belittled and ignored. The SJVAPCB has stated that covering or stabilizing the top of the coal means it will travel cleanly. For them coal transportation pollution does not exist.

In truth, it is a very big issue. The problem lies in the design of the railcar. They are bottom dumpers and have 2 cooling vents low on each side of the car. This means that coal dust and small nuggets are continually shedding with each bump from the rails. The weight of the load presses down, grinding and breaking the coal at the bottom. The unevenness of the rail bed provides a limitless supply of contamination. (Trucks have a similar bottom dumping design.)

In Wasco you see a line of coal down the middle of the track and 2 more lines, one on each side of the rails. It is visible there because the railcars move slowly toward unloading. The truth for us is that approximately 400 railcars a week will throw off coal dust and nuggets every foot of the rail line from New Mexico, through our farm crops, to the HECA factory.

What really worries me the most though are the fine particulates that we can't see and can't count. PM 10 and PM 2.5 must flow like rivers from every railcar at every bump. If HECA "only" emits 520 tons of pollution, it will be on the list of the top 10 worst pollution emitters in California. How much higher on the list will it sit when all of its toxic emissions are counted?

Has anyone in the CEC looked into the route the high-speed rail train will use? It is my understanding that it will pass through Wasco and may take out the coal depot.