

DOCKETED

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Comment Received From: Chris Romanini

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Revised PSA Needed

We farm very near to HECA. Our family has been working this land for over 100 years, since our grandparents came as laborers to build the canals for Miller and Lux. Our grandchildren make the 5th generation, but we wonder if it will be safe and healthy for the fifth generation to remain if HECA is our neighbor. We look to the PSA for answers, but our concerns are mostly unresolved with your PSA. So I was relieved in Oct when the EPA concurred and labeled the PSA "insufficient information". Two items in the EPA report speak to my concerns the most.

Take health. The PSA acknowledges Kern has the worst air in the nation. We have health problems brought on by our polluted air which include the highest death rate in California for asthmatics and for coronary heart disease. Our Valley Fever rate is on the rise. We have allergies. (We've recently learned that polluted air causes lung cancer.) But with the 500 tons of new emissions from HECA making our air even dirtier, the PSA concluded that HECA would not result in any significant risks of cancer or health. I was baffled how they came to that conclusion. Fortunately, the EPA was baffled, also. The EPA said that it is not clear how the preexisting health conditions were considered or how this information affected the conclusions, if at all. The EPA recommends you go back and clarify your assessment.

One careless example was your pre existing health conditions study done by zip code. You had zip codes for Shafter, Taft, and several for Bakersfield, but in only 2 of the studies did you include the zip code of Buttonwillow. And not once did you include the zip code of Tupman!! What was the point of discussing far away areas and not the most impacted people inhaling the most fumes? I have "insufficient information" from your study that my grandchildren will be health protected. Per the EPA you need to go back and clarify how the health risk assessment considered preexisting health conditions for the most sensitive individuals. You need to get that information to us so we can comment intelligently, before you form your final determination.

Then take the risk of hazardous materials. We work with anhydrous ammonia and know it's dangers from even a 1000 gal tank. You did modeling showing the results of the most likely release of ammonia fumes saying it would extend a little beyond the fence line. You went on to say "the storage and use of anhydrous ammonia will not result in a significant risk to the off-site public". After telling us how safe we will be, you did a study of an accidental release of one big tank of anhydrous ammonia ... the tank holds 1,900,000 gallons... showing how far the ammonia fumes would go. But you provided this report to staff under confidential cover. What are you hiding from us? The EPA also wonders why this information can not be given to the public. I have "insufficient information" to know if my grandchildren will be safe from an accidental release of ammonia. Fortunately, the EPA helped out. They used your figures to model an accidental release of anhydrous ammonia from a 1,900,000 gal tank over a 10 minute period. It showed toxic endpoint distance between 13 and 25 miles. And the Tupman school is only 1.5 miles from that tank. And my grandchildren would be a lot closer. The EPA went on with several suggestions what you should include in your assessment.

Our risks have not been disclosed. If I were a teacher grading this report I would hand it back to you and tell you to complete it if you want a grade. You need to complete this PSA and re-issue it as a revised PSA. You should move slowly, be accurate, and give the public meaningful information so we can be involved and comment intelligently, before you move to a final. Of course include other unresolved issues also, so the public can be involved.... like a contract with OXY, or a discussion of dry cooling, Salvage coal details on expansion, who will own the third party elements, BEFORE you issue a final. The public deserves this.

Chris Romanini, HECA Neighbors