

Energy - Docket Optical System

From: Campos, Alicia@Energy
Sent: Monday, February 25, 2013 9:23 AM
To: Energy - Docket Optical System
Cc: Scott, Diane@Energy
Subject: 08-AFC-08A Hydrogen Energy California - Public Comment from Trudy Douglass, dated February 22, 2013 - Please Docket and Post to the Web under Public Comments

Categories: Ready to Docket

From: Trudy Douglass [<mailto:trudydouglass@att.net>]
Sent: Friday, February 22, 2013 11:11 AM
To: Worl, Robert@Energy; Energy - Public Adviser's Office
Subject: This has never been docketed



To: CEC & DOE Regarding HECA

Docket No, 08-AFC-8A

Nov. 7,2012

From: Trudy Douglass

My concerns about the proposed HECA chemical plant:

SCS Energy has been trying to permit PurGen One in New Jersey. It is to be a chemical factory just like the one they have proposed in Tupman. The New Jersey site they are interested in is on the Atlantic Coast. New Jersey said "NO" but, if it had been permitted and if the plant had been in operation, think of the toxic disaster that would have been created when the plant was hit by Sandy, with 100mph winds and storm surges of 12 to 13 feet . Mercury and anhydrous ammonia would be only two of the poisons spread far and wide. Hurricanes at such northern latitudes are supposed to occur every 100 years. The area was hit with them in two consecutive years. It would be hubris to assume that the plant would have been engineered for such occurrences.

I think it is also prideful when SCS says that it will engineer the HECA plant to withstand a San Andreas Fault earthquake. They can build a plant to current specifications for area 4, but building to meet the minimum standards is not enough. It is impossible to have foreknowledge of the magnitude, depth, or ground acceleration a quake will actually have. In addition, the fracking done by Occidental Petroleum in the area between the fault and the site will be yet another variable. The one thing we know about California is that there will be earthquakes. So when "the big one" hits and the plant collapses there will be consequences. The death toll will be high, water for Southern California in the Aqueduct and the local wells will be poisoned and the land around the site will be toxic forever. SCS will be protected from the liability of these consequences by saying, "We built to specifications, you can't sue us." This facility's products and systems are way too dangerous for the proposed location. Do you feel that this facility is so safe and healthy that you would move your families to live in Tupman when HECA is operating? If you can't honestly say yes, you must stop SCS and this proposed factory. California should be as wise as New Jersey and say "NO".

I saw on a map that Stockdale Highway and the roads between Interstate 5 and the site are to be rebuilt for the new volume of traffic. That is not enough. All traffic going east and west must use Highway 58. It dead-ends on to Real Road which has only 2 lanes. Whatever route chosen for use between 58 and I5 needs to be rebuilt. No roads in place can stand up to a hundred more trucks a day, not even Taft Highway. The route between Wasco and the site must also be rebuilt. Are you requiring HECA to pay for all road building before construction begins? If you don't get a commitment to this before approval the taxpayers of California will have to pay later.

A really big concern for me is the feedstock for this factory. Coal and coke are graded on a sliding scale. At the bottom of the scale they are both dirty and toxic. Are you establishing rigid guidelines for the quality of coal and coke to be used? Are you requiring strict testing and record keeping of fuel sources? What outside authority are you putting in place to monitor compliance? Are you making these restrictions part of the operational rules of the factory so that no matter who owns HECA these rules will always apply? These must be established before approval. Other than rejecting this project, this is the only protection for the people, land and water around the site

If this chemical plant is allowed to be built, HECA must have an exit plan for returning the site back to its original condition when they stop operation. A special untouchable trust of \$500,000,000 should be established, at the time of approval, which will grow in interest for 30 years. This will prevent the future HECA operators from declaring bankruptcy and walking away, leaving us with a toxic waste site. Have you established a procedure and protocol for closing this factory and have you set aside money for this process? Like the roads, the feedstock and monitoring an exit plan must be established before approval. When chemical plants were built in the first part of the last century there was little knowledge of how toxically polluted the land and water would become. There is no excuse for California Energy Commission to approve a chemical factory without an extremely large amount of capital set aside for the unknown costs of redeeming the land.

HECA will use more than 6.6 million gallons of water a day. Have you calculated the impact this volume of use will have on the people and the farms for the next 30 years? We live in a desert and have had many years of drought. Rain and snow, like earthquakes, are unknowable. What procedure will you establish for the future when water becomes even more scarce and decisions have to be made between the people, the farms and HECA? Do you have a protocol for complaints about SCS and HECA for operational violations and damage to people, land and water? Who do we sue? HECA must be made responsible for the CO₂. They produce it and they must see that it is safely stored . Don't make this one more expense the people of Kern County have to bear.