

Energy - Docket Optical System

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Sent: Saturday, March 30, 2013 4:22 PM
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Subject: revised-PM2.5 Tupman in Danger Enviromental Justice

Forgive my oversight, I missed the sentence that said the non-attainment of PM2.5 particulates excluded them from analysis. This statement does not make the danger to Tupman residents and area workers any less. The fact that the San Joaquin Valley Air Pollution Control District proceeded to authorize the HECA project lowers my opinion of the board even more. The unnumbered PM2.5 particulates of death, the board seems to believe can be released into the air without consequences, are reason enough to deny HECA a permit to build.

The American Lung Association and American Cancer Society both have studies linking PM2.5 particulates and smaller to lung cancer and heart disease and all reparatory diseases. They are some of the most dangerous particulates because they can pass through the body's defenses and settle in the lungs. Children and the elderly are especially vulnerable.

I am sure that all the HECA factory workers will all be using breathing masks but the men, women, and children living in Tupman will have no protection. HECA's stack may blow some emissions above their town but these fine particulates generated at ground level will not leave the valley. Particulates PM2.5 and smaller will be streaming from almost every 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, factory waste and products. Even in the gasification process, HECA assumes that the sub-micron range will be PM10 but they could as well be PM2.5. Fine particulates will be in every breeze that passes through Tupman. (If this isn't bad enough, unnamed "Fugitive Emissions" can escape at any time.VI,p.36)

From the first day of construction on HECA the air in Tupman and the area surrounding the factory will become a loaded gun waiting to go off inside any person living or working in the vicinity of the plant. Tupman will just be the first to experience this polluted haze because after 30 years of HECA the whole Southern San Joaquin Valley will be full of the particulates.

There is no way that the CEC, the District 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.