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To: leonard.scandura@valleyair.org; Worl, Robert@Energy; roberts.blake@energy.ca.gov

Subject: SJVAPCD and HECA

To:CEC and SJAPCD regarding HECA

From: Trudy Douglass

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On April 2, Mr. Warner of the San Joaquin Valley Air Pollution Control District said that the board's decision on the Preliminary Determination of Compliance was all about the air. However, many members of the district's staff have made different statements: "We need electricity.", "It is good for our finances.", and "It's good for the economy." Have they forgotten that intent of their mission is to do good for the AIR and the PEOPLE **not** the corporation? I cannot believe that adding more than 80 tons of PM2.5 a year to the valley is going to be good for our children's air.

Do we really need more electricity? It is my understanding that Kern County's power grid is almost at capacity from what we produce now. PG&E is going to build a switching station and make other modifications for connecting HECA to the grid. The costs of alterations like these are usually passed on to the consumers, so we will be paying more for our electricity. Is it good for our finances? It looks like Kern County residents will be fined for generating too much waste because of the 70 truck loads of slag HECA will send to our dumps each day. In addition, we will pay for the roads destroyed by the high volume of HECA truck traffic. The wealth of this factory will come at a high cost to both our health and our pocketbooks.

On that same night Mr. Warner said that environmentalists love the gasification/ sequestration/chemical factory process. He had none of them present to tell us of the benefits to the valley of this project. The fact is that New Jersey, Australia, Ireland, and Abu Dhabi have all said no to this industrial monstrosity. Kern County is to be the world's lab rat.

If the district really cared about the air, they would not have disregarded rules 2201 and 2410. These rules: "require an examination of the impacts of the proposed project on the ambient air quality." In the PDOC, the district chose to look at the effect of the valley air quality **on** the HECA project site. These rules also go on to state that the historic or significant actual emissions of the valley are to be used in district formulas and that they can do their calculations on as little as two years of data. Also monitors with higher emission levels give the most conservative results. The district used a number of different monitors for different emissions but they chose to ignore in the highest concentrations of these emissions recorded in Arvin, Bakersfield, and Edison.

The goal is have: "No net increase in emissions above specified thresholds from new Stationary Sources of all non-attainment pollutants and their precursors." 2201, 1.2 SJVAPCD have failed to do this. PM2.5 is in non-attainment and no amount of mitigation will make the over 80 tons of it a year safe for the valley residents to breath.

Last, shame on the SJVAPCD staff and HECA, how can they use the "speculation" that the height of the stack will carry the poisonous emissions out of our area as a selling point for building this filthy factory. It is indefensible that they would be proud of this. In order to fulfill rule 2410 and to protect the people who live in the valley, they need to project the worst case scenario for the HECA factory. This is that all the emissions stay in the valley for the next 30 years. Have they no respect or regard for the people they are supposed to protect? Isn't it their agency's responsibility to prevent deterioration to air quality?