Coalition For A Safe Environment

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California Energy Commission

Petroleum Infrastructure Best Permitting Practices

Public Comments

1. **Current Permits allow every refinery & storage tank facility to pollute the public air.**

   The Public and Communities want permits to include mandatory requirements to use the Best Available Technology (BAT) when it becomes available and based on independent University research. The Petroleum Industry has lied about what BAT is available and fails to incorporate it (ie. Kinder Morgan Tank Storage Facility in Carson, California). We want all tanks to have permanently sealed roofs and vapor recovery systems.

2. **Current Permits do not require any significant mandatory air pollution reduction.**

   The Public and Communities want permits to include a 5 year plan to reduce air pollution by 75% and a 10 year plan to reduce air pollution by 90%.

3. **Current Permits do not require full disclosure and reporting of Petroleum Industry compliance to laws, rules, regulations and permits.**

   The Public and Communities want an annual full disclosure of all violations and non-compliances. To include but not be limited to: # of Notices of Compliance, # Notices of Violations, # of Equipment Breakdowns, # of Fines, Dollar Amount of Fines & Settlements, # of Repeat Violations, # of Public Complaints, # of Law Suits, # of Settlements, # Penalties etc..

4. **Current Permits do not require full disclosure and reporting of the Petroleum Industry practice of Purchasing, Selling, Trading and Exchanging of Credits (RECLAIM, ERC's etc.) in order to bypass doing mitigation in the local community impacted and reducing air pollution.**

   The Public and Communities want full disclosure and reporting of any Credit activity the Petroleum Industry company is involved in and wants the immediate termination of all RECLAIM or Credit programs.

5. **Current Permits do not require the annual disclosure of the amount of air, water or land pollution a Petroleum Industry company has emitted regardless of the circumstances.**

   The Public and Communities want full disclosure on an annual basis and a 10 year chart of the air, water and land pollution a company is emitting into the community.

6. **Current Permits do not have mandatory community public health care mitigation requirements for public exposure to air, water and land pollution.**

   The Public and Communities want local mandatory public health care mitigation and the establishment of a public health care trust fund, based on their percentage of industry contribution and negligence.

7. **Current Permits do not have mandatory community environmental mitigation requirements for air, water, land pollution.**

   The Public and Communities want local mandatory annual environmental mitigation for air, water and land pollution and the establishment of an public environmental trust fund, based on their percentage of industry contribution and negligence.

8. **Current Permits do not require mandatory Public Hearings when a Petroleum Industry company has violated any require compliance or has polluted the community.**

   The Public and Communities want mandatory public hearings every time the Petroleum Industry company has violated a permit, law, rule, regulation, condition or polluted the air, water or land.

9. **Current Permits do not require mandatory written public reports to be prepared when they have violated a permit, law, rule, regulation, condition or polluted the community.**

   The Public and Communities want mandatory reports of all violations, penalties, settlements, and environmental air, water or land incidents

10. **Current Permits do not contain any significant sanctions or penalties conditions for serious violations and repeat violations**

    The Public and Communities want stringent conditions that will significantly prevent any violations or repeat violations, including suspension of a business and closure of a business.

11. **Current Permits do not require real time monitoring, measurement and reporting of any air, water or land pollution discharge.**

    The Public and Communities want real time monitoring, measurement and reporting of any and every air, water or land pollution discharge. It is not the Public's responsibility to be policemen and report problems. That is the responsibility of AQMD's, ARB and EPA.

12. **Current Permits do not have requirements that allow the public sufficient time to be notified and provide public comment on permits or Environmental Impacts Reports.**

    The Public and Communities request a minium of 90 days of advance pubic notice, a 90 day public comment period and notification be sent to every resident within a 10 mile radius of a facility. Notice shall be translated into the common languages of that community and an ad be placed in every local newspaper.

13. **Current Permits do not have any requirements that a Petroleum Industry company be 100% or majority owned by US Citizens.**

    The US Public wants no foreign ownership of US Petroleum industry companies. The Public wants no foreign oil, gas or fuel source or price manipulation of a business industry critical to US domestic fuel sources and products. California can set any requirements it wants.