

# PUBLIC SUBMISSION

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**Docket:** EPA-R09-OAR-2016-0026

Navajo Generating Station - Refined Coal Treatment System - Clean Air Act Minor New Source Review Permit

**Comment On:** EPA-R09-OAR-2016-0026-0001

NGS Proposed Permit Feb 2016

**Document:** EPA-R09-OAR-2016-0026-0008

Comment on EPA-R09-OAR-2016-0026-0001

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## Submitter Information

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## General Comment

Vincent Yazzie  
10080 Palomino Road  
Flagstaff, AZ 86004

vinceyazzie@yahoo.com

To whom it may concern,

SRP has not adequately studied possible rises in trihalomethanes (THM) in the water when calcium bromide is used like when Duke Energy stopped used calcium bromide due to increased THM in the water. THM will have an adverse impace to the local population and minority groups.

[http://www.bizjournals.com/charlotte/blog/queen\\_city\\_agenda/2015/08/duke-energy-city-water-quality-concerns-but-still.html](http://www.bizjournals.com/charlotte/blog/queen_city_agenda/2015/08/duke-energy-city-water-quality-concerns-but-still.html)

Deny the permit to SRP.

Sincerely

Vincent Yazzie

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## **Attachments**

Duke Energy, city\_ Water quality 'concern' but still safe - Charlotte Business Journal

# PUBLIC SUBMISSION

**As of:** 3/21/16 12:16 PM  
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**Docket:** EPA-R09-OAR-2016-0026

Navajo Generating Station - Refined Coal Treatment System - Clean Air Act Minor New Source Review Permit

**Comment On:** EPA-R09-OAR-2016-0026-0001

NGS Proposed Permit Feb 2016

**Document:** EPA-R09-OAR-2016-0026-0011

Comment on EPA-R09-OAR-2016-0026-0001

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## Submitter Information

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### General Comment

Vincent Yazzie  
Flagstaff, Arizona  
vinceyazzie@yahoo.com

There are some carbon monoxide deaths on Lake Powell due to house boats.

<http://www.cdc.gov/mmwr/preview/mmwrhtml/mm4949a1.htm>

In attached 171-05ee2\_CDC\_Carbon\_monoxide.pdf, page 7 has the 4 boats tested on Lake Powell. Sea Ray, Glastron, Bayliner, and Crownline.

Page 43 of 46 has a high CO behind the boat of around 50 ppm at 12 ft. CO is 20 ppm about 8 feet to the rear of the boat. Same thing for Glastron on page 44 of 46. One wonders how CO is getting to the captain's seat unless there CO is present on the lake. Same thing for Bayliner on page 45 of 46. One wonders how CO is getting to the captain's seat unless there CO is present on the lake.

Carbon Dioxide and carbon monoxide are heavier than air and displace oxygen on the surface of Lake Powell. Which would account for the higher background carbon monoxide on Lake Powell.

Limnic Eruptions: When Lakes Explode  
<https://www.youtube.com/watch?v=o8AonDeS8HY>

Install pipes to vent off Carbon dioxide and Carbon monoxide.

There could be a body count due to carbon monoxide from Navajo Generating Station. Low NOX burners need to be shut off and SCR installed. Deny permit to NGS and Salt River Project.

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## **Attachments**

171-05ee2\_CDC\_Carbon\_monoxide

# PUBLIC SUBMISSION

<b>As of:</b> 3/21/16 12:17 PM
<b>Received:</b> February 24, 2016
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**Docket:** EPA-R09-OAR-2016-0026

Navajo Generating Station - Refined Coal Treatment System - Clean Air Act Minor New Source Review Permit

**Comment On:** EPA-R09-OAR-2016-0026-0001

NGS Proposed Permit Feb 2016

**Document:** EPA-R09-OAR-2016-0026-0012

Comment on EPA-R09-OAR-2016-0026-0001

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## Submitter Information

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### General Comment

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Navajo Generating Station (NGS) is 4,376 feet above mean sea level (MSL). Page, Arizona is at an elevation of 4,337 feet above MSL and 3.83 miles bearing of 286 degrees from NGS. Page, AZ is 39 feet below NGS.

LeChee, Arizona is at an elevation of 4,786 feet high above MSL. LeChee, AZ is 4.87 miles from NGS at a bearing of 223 degrees from true north. LeChee, Arizona is 410 feet high above NGS.

The flue stack at NGS is 775 high for a flue elevation of 5,151 feet high. The flue stack is 814 feet above Page, Arizona.

The flue stack is 365 feet above LeChee, Arizona.

LeChee, Arizona is a Navajo ghetto in the shadow of the NGS smoke stacks. Navajos are a minority population. Minority populations are closer to flue stacks than the people of Page, AZ in terms of elevation. The flue stacks need to be 430 meters high instead of 775 feet.

# PUBLIC SUBMISSION

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Navajo Generating Station - Refined Coal Treatment System - Clean Air Act Minor New Source Review Permit

**Comment On:** EPA-R09-OAR-2016-0026-0001

NGS Proposed Permit Feb 2016

**Document:** EPA-R09-OAR-2016-0026-0014

Comment on EPA-R09-OAR-2016-0026-0001

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## Submitter Information

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### General Comment

Vincent H. Yazzie  
Flagstaff, Arizona 8600

vinceyazzie@yahoo.com

Howeth, et.al. v. Aramark Corporation, et.a., Third Amended Complaint, CV-00221, 2010, US District Court for the District of Utah attached as a file.

Citing Howeth, et.al. v. Aramark Corporation, et.a., Third Amended Complaint, CV-00221, 2010, US District Court for the District of Utah, page 5, Paragraph 29, "In 1986, more than twenty-two (22) years prior to the catastrophic accident involving plaintiffs, the United States Coast Guard issued a report which informed boat and boat equipment manufacturers, distributors and dealers, among others, that engine emissions on boats were causing a significant number of injuries and deaths to boat occupants due to exposure to toxic levels of carbon monoxide."

Page 5, paragraph 30, "By at least 2001, the houseboat manufacturing, component and houseboat rental industries, including the Defendants, were aware that carbon monoxide poisoning injuries and deaths were still occurring at unacceptable levels and were still considered to be a serious hazard to public health by the United States Coast Guard ("USCG") and by the National Park Service ("NPS"). Additionally, by this date, the USCG and NPS had informed the marine industry and these Defendants that the problem was particularly severe at Lake Powell."

Carbon monoxide emissions from houseboats have created dangerous pockets of carbon monoxide

levels near the water elevation. Any Navajo Generating Station (NGS) carbon monoxide emissions that settle at the lake elevation will add to the localized house boat emissions under calm conditions.

Page 10, paragraphs 60 to 63, "60. The weather conditions that evening were calm with little or no wind.

61. Plaintiffs were operating the boat's generator that evening for air conditioning and other electrical appliances.

62. On information and belief, water entered the tubing for the exhaust system and blocked deadly carbon monoxide gas from properly exiting the exhaust system, and instead, forced the gas to be expelled through the generator's water drain into the water under the boat.

63. The carbon monoxide exiting the water drain caused carbon monoxide to build up under, around, and within the subject houseboat."

The accident occurred June 24, 2008 at Rock Creek Bay see attached map.

Page 11, paragraph 64 and 65, "64. As a result of the excessive accumulation of carbon monoxide under and around the subject houseboat, carbon monoxide levels in the cabin of the houseboat rose to levels that imperiled the lives of the Howeth family.

65. On the third night during the buildup of carbon monoxide inside the subject houseboat, the Carbon Monoxide Detectors failed to alarm and alert the Howeth family of the presence of toxic and injurious levels of carbon monoxide."

Any NGS carbon monoxide that descends to the lake level will add to localized house boat carbon monoxide emissions creating a dangerous condition for people at the surface of the lake.

Carbon monoxide and carbon dioxide air monitoring stations must be setup throughout Lake Powell. NGS Flue stack must be rebuilt to a height of 430 meters.

Low NOx burners must not be operated.

Deny permit to NGS and Salt River Project due to excessive levels of carbon monoxide at the surface of Lake Powell.

Sincerely,

Vincent H. Yazzie

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## Attachments

rock\_creek\_bay\_ngs

Howeth\_v\_Aramark\_third\_amended\_complaint

# PUBLIC SUBMISSION

**As of:** 3/21/16 12:21 PM  
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Navajo Generating Station - Refined Coal Treatment System - Clean Air Act Minor New Source Review Permit

**Comment On:** EPA-R09-OAR-2016-0026-0001

NGS Proposed Permit Feb 2016

**Document:** EPA-R09-OAR-2016-0026-0017

Comment on EPA-R09-OAR-2016-0026-0001

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## Submitter Information

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### General Comment

Vincent H. Yazzie  
Flagstaff, AZ 86004  
vinceyazzie@yahoo.com

To whom it may concern,

Deny permit to Salt River Project (SRP) due to excessive Carbon Monoxide (CO) that reaches the surface of Lake Powell as local CO level are already at severe levels and can contribute to CO poisoning.

Woman's death at Lake Powell is under investigation, Salt Lake Tribune,

<http://www.sltrib.com/home/2765883-155/womans-death-at-lake-powell-is>

The Kane County Sheriff's Office is investigating the Thursday death of a Colorado woman at Lake Powell.

About 4:30 p.m. Thursday, dispatchers received a call that Rosalie Vanherwaarden, 47, had collapsed at Last Chance Bay on the south side of the lake, said U.S. Forest Service spokeswoman Katie Wood. Further details about how she collapsed, including whether she was on shore or in the water, were not immediately available.

Emergency responders from the National Park Service, the sheriff's office and Utah State Parks arrived



at the scene and tried to revive Vanherwaarden, but she died.

"We do not know exactly what the cause of her death was," Wood said.

Vanherwaarden was from Greeley, Colo.

mmcfall@sltrib.com

Twitter: @MikeyPanda

Last Chance Bay is at a bearing of 25.30 degrees N from Navajo Generating Station (NGS) at a distance of 15.5 miles. See attached last\_chance\_bay.jpg

Wind has shifted from a SE direction to a SW Direction from June 24, 2015 to June 25, 2015. See page\_weather\_062415.jpg

NGS CO may have contributed to her death, but the death still under investigation.

Sincerely,

Vincent Yazzie

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## Attachments

last\_chance\_bay

page\_weather\_062415

# PUBLIC SUBMISSION

<b>As of:</b> 3/21/16 12:24 PM
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**Docket:** EPA-R09-OAR-2016-0026

Navajo Generating Station - Refined Coal Treatment System - Clean Air Act Minor New Source Review Permit

**Comment On:** EPA-R09-OAR-2016-0026-0001

NGS Proposed Permit Feb 2016

**Document:** EPA-R09-OAR-2016-0026-0018

Comment on EPA-R09-OAR-2016-0026-0001

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## Submitter Information

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### General Comment

Vincent Yazzie  
Flagstaff, AZ 86004  
vinceyazzie@yahoo.com

Dear Sir,

Lake Powell between 1990 and 2009 had 211 CO poisonings or 24% of the total according to Boat-Related Carbon Monoxide Poisoning, Robert Baron, MD

<http://www.slideshare.net/OutreachNSBC/co-poisoning-presentation-ibwss-2012>

1. Boat-Related Carbon Monoxide Poisoning Robert Baron, MD Medical Advisor, Glen Canyon National Recreation Area Director of Quality and Risk, Emergency Professional Services, Phoenix, AZ  
Special Thanks to: Jane McCammon, NIOSH Retired 16th International Boating and Water Safety Summit San Diego, CA March 6, 2012
2. We only see what we look for, We only see what we look for, and and we only look for what we know we only look for what we know McCammon & Baron Nov 2009
3. NIOSH Disclaimer Disclaimer: The findings and conclusions in this presentation have not been formally disseminated by the National Institute for Occupational Safety and Health and should not be construed to represent any agency determination or policy Disclaimer: Mention of any company or product does not constitute endorsement by CDC, NIOSH
4. Contributors: US Coast Guard: Phil Cappel and his team at the Recreation Product Assurance Division past and present NIOSH: Jane McCammon, Kevin Dunn, Alberto Garcia and all of the

NIOSH staff past and present National Park Service: Steve Luckesen, Sara Newman, Kerry Haut, Brian O'Dea and their administrators and staff past and present. US Department of the Interior: Tim Radtke McCuneWright, LLP: Richard McCune

5. For a copy of this presentation please send requests to: [erfpmd1@cox.net](mailto:erfpmd1@cox.net)

Desert Rock Power Plant lost its permit as the addition of Desert Rock would worsen the smog in the Four Corners Area. Navajo Generating Station (NGS) would worsen the carbon monoxide (CO) levels at Lake Powell.

"We've been saying for a long time that the Desert Rock permit process was flawed from the start due to existing adverse environmental and human public health conditions," said Lori Goodman with Din CARE. "This situation would be worsened by the addition of Desert Rock. We are thankful that EPA has now stepped up to uphold the law and look out for the health of the people of the Four Corners Region, including the Navajo Nation."

EPA Remands Permit for Desert Rock Coal Power Plant, Earth Justice  
San Francisco, CA

<http://earthjustice.org/news/press/2009/epa-remands-permit-for-desert-rock-coal-power-plant>

Deny Salt River Project (SRP) permit for NGS due to additional CO that will worsen existing adverse environmental and human public health conditions.

Sincerely,

Vincent H. Yazzie

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## Attachments

carbon\_monoxide\_deaths\_lake\_powell

1\_boat\_engine\_is\_33\_cars