

**Adam Fieseler**

---

**From:** Rose Flame [mysecretfires@gmail.com]  
**Sent:** Monday, September 24, 2012 10:48 PM  
**To:** Adam Fieseler  
**Cc:** Alayna Shulman; Heidi Strand; Eric Cassano; Ed Smith & Virginia Phelps; Bill Walker  
**Subject:** Public Comments, re: Shasta County Regional Action Plan EIR, (Code: Shasta 123)  
Re: Shasta County Regional Action Plan EIR, public comment submission  
From: Celeste Draisner, citizen activist  
To: Adam Fieseler, Shasta County Air Pollution Inspector II

Dear Adam Fieseler & Shasta County Air Pollution Control Board;

I am glad Shasta County is addressing the issue of global warming.

I am formally requesting that the public comment period be extended. Please extend the comment period timeline until September 25th at 5PM, the day the public hearing has concluded. Please allow our letters to be postmarked by this date.

This minor alteration will allow the public to absorb information presented and provide meaningful comments.

I have a few questions (relating mostly to enforcement and ethics) I am hoping can be answered now:

1. What is the banked air pollution credit system?
2. Does each county have a separate banked air credit system?
3. Is there a banked air credit system still operating in Shasta County?
4. How was the banked air credit system we use in California developed and who monitors and enforces this system?
5. How many air pollution credits are currently available for sale on the market in Shasta County? Please list all credits in the system and the current owners of these pollution credits.
6. Are there plans to track carbon emissions as part of a banked air pollution credit system? Would this be handled by the State of California in one large carbon trading bank or would individual counties bring carbon emissions into their existing pollution credit trading banks?
7. Please explain California Assembly Bill AB3319. When was this passed in the California Assembly and who sponsored the bill?
8. AB3319 allowed individual counties to "opt out" of the "no net increase" or banked air pollution credit system. Was Shasta County the only county to adopt AB3319 and devalue their pollution credits?
9. When did the Shasta County Board of Supervisors (acting as our Air Pollution Control Board) adopt AB3319 and what were the reasons given?

10. In 1996, when Knauf Insulation (aka Knauf Fiber Glass) announced plans to build their manufacturing facility in Shasta Lake, how many pollution credits were available in Shasta County? How many credits would Knauf have needed to build and operate their facility?
11. How long did Knauf Fiber Glass operate in Shasta County without a Permit to Operate? How long was Knauf Fiber Glass in violation of their NOx emission levels, as described in their Authority to Construct (ATC) Permit?
12. How much money has Knauf Fiber Glass paid to Shasta County for violations at their Shasta Lake facility? How much money has Knauf paid to EPA Region IX for violations at their Shasta Lake Facility?
13. When did Knauf Fiber Glass first seek the purchase of pollution credits, as a means of satisfying their NOx emission failures in their ATC permit?
14. When did the Shasta County Supervisors, acting as our Air Pollution Control Board, bring back the "No Net Increase" air pollution banked credit system? What reasons were given for bringing this system back, and revaluing the pollution credits?
15. Can pollution credits be bought and sold easily in Shasta County? What is the procedure for purchasing credits? Is Best Available Control Technology (BACT) still considered when industrial sources increase emissions, or are simple credit purchases sufficient?
16. Does Shasta County currently meet California air quality standards? What plans are in effect to bring us closer to compliance?
17. 3M is currently planning to build a quarry in and next to the City of Shasta Lake. How much estimated carbon will be produced by the factories located on the site? How much pollution of all types will be produced by this quarry? Are there enough pollution credits on the market to meet the demands of the 3M quarry? If not, will the Shasta County Supervisors bring AB3319 back into law and again devalue all Shasta County air pollution credits?
18. Why is Shasta County the lead agency for the 3M Quarry and not the City of Shasta Lake?
19. What steps is Shasta County taking to involve the City of Shasta Lake in their EIR process, in accordance with federal Environmental Justice Guidelines?
- 20.. When did EPA Region IX strip Shasta County of their power to issue and amend Prevention of Significant Deterioration (PSD) permits? Why was this done? Did Region IX give different reasons for this than Shasta County?
21. Please list all violations by all industrial sources in Shasta County for the last 5 years. What corrective action plans were taken? Please list all fines levied against industrial pollution sources in the last 5 years.

Thank you for your time. I look forward to the meeting tomorrow.

Sincerely,

Celeste Draisner  
530-921-0272

05/17/2013