

## Tara Davis

Emergency Planning Issue - Hydrochloric Acid (HCl).

ADI WILL HAVE LARGE QUANTITIES OF HCl that will be stored, transported and used onsite. Even a small HCl spill would have cascading and long reaching effects for all downwind and downhill. Cochise County has access to ALOHA (or equivalent) software, but has not used it to predict the impacts of an accident at the ADI location. This is extremely shortsighted and ADEQ should demand additional studies of these types before any possible granting of a permit.

Here is a critical warning about HCl - "WARNING, HYDROGEN CHLORIDE CAN REACT WITH WATER AND OR WATER VAPOR. THIS CAN AFFECT THE EVAPORATION RATE AND DOWNWIND DISPERSION. ALOHA CANNOT ACCURATELY PREDICT THE AIR HAZARD IF THIS SUBSTANCE COMES INTO CONTACT WITH WATER." This plant is surrounded by residences, schools, hospitals and nursing homes, how fast could these people be evacuated? No one seems to know because no one is demanding tough answers, so i believe that means ADEQ must step up and do additional studies before granting this permit.