



## PORT OF OAKLAND

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Mr. Weyman Lee, P. E.  
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Bay Area Air Quality Management District  
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Dear Mr. Lee:

**SUBJECT: COMMENT LETTER – RUSSELL CITY ENERGY CENTER CORRECTED STATEMENT OF BASIS FOR PREVENTION OF SIGNIFICANT DETERIORATION AND PROPOSAL TO AMEND FEDERAL PREVENTION OF SIGNIFICANT DETERIORATION PERMIT**

The Port of Oakland, Oakland International Airport (Port) understands that the California Energy Commission (CEC) issued a permit for the Russell City Energy Center in 2002 and approved an amendment to that license/permit on September 26, 2007. The amendment was required due to a change in the project; the facility location was moved approximately 1,500 feet further north of the original proposed site. The Environmental Protection Agency (EPA) delegates Prevention of Significant Deterioration (PSD) permitting responsibilities to the Bay Area Air Quality Management District (BAAQMD). The BAAQMD initially issued an amendment to the PSD permit on November 1, 2007. The amendment to the PSD was appealed to the EPA Environmental Appeals Board (EAB) and is currently under review as part of the federal approval process. The EPA EAB issued a Remand Order requiring the BAAQMD to re-notice the amendment so that additional interested parties have the opportunity to comment. This additional review does not re-open the CEC license process.

The BAAQMD is inviting all interested parties to comment on any aspect of the Amended Federal PSD Permit. The Port is taking this opportunity to inform the project proponent and applicable regulatory agencies of its concerns. Comments and questions are provided below. The Port is concerned that the thermal plumes energy centers generate near airports have the potential to affect navigation within the airspace. The approving agencies should make certain that cumulative impacts are considered for any future projects that may potentially generate thermal plumes, restrict airspace, or result in impacts to air navigation.

The RCEC is a natural gas-fired, combined-cycle, combustion turbine power plant. The power facility would generate 600 MW of electricity. The RCEC cooling tower will generate thermal plumes at 600 feet to 800 feet above ground level thus could present a hazard to single engine aircraft flying below 1,000 feet. The effect of locating an energy center within the Hayward airspace could restrict the existing or future use of airspace. The RCEC could affect air traffic patterns, the utility of the Hayward Executive Airport and the surrounding airspace.

The Statement of Basis for the amendment to the PSD permit states that RCEC will result in an increase in air pollutant emissions of NO<sub>2</sub>, CO, PM<sub>10</sub>, and SO<sub>2</sub>. Therefore an Air Quality Impact analysis was conducted. The Air Quality Impact Analysis includes a presentation/summary of the modeling methodology used for various plume dispersion scenarios. The scenarios include simple terrain impacts (receptors located below stack height) and complex terrain impacts (for receptors located at stack height or above). The analysis, however, doesn't discuss potential effects on visibility and OAK flight patterns, as a result of its thermal plumes. How would thermal plumes from RCEC affect visibility for aircraft? Would the power plant, at its new location, change air traffic patterns that would result in impacts to OAK? What type of turbulence will RCEC create for aircraft? Are there any conditions under which OAK traffic patterns would be affected, i.e., air traffic would be directed to OAK due to RCEC?

Port staff recommends that the Energy Commission, along with the FAA and the California Department of Transportation Division of Aeronautics pursue developing policies and or guidelines that specifically address the issue of constructing energy centers in proximity to airports or within airspace. Guidelines or policies that restrict constructing energy centers within a specified radius of an operating airport would reduce the potential to have a conflict between airport use and the hazards that thermal plumes present. The applicable regulatory agencies and Energy Commission could review and process certifications for similar projects in a standardized / consistent framework rather than a project-by-project basis.

Please contact me at (510) 627-1351 regarding the Port's comments on the Russell City Energy Center project.

Sincerely,



Renée T. Ananda  
Port Associate Environmental Planner  
Port of Oakland  
Environmental Programs and Planning Division

cc: Steven Grossman, Director of Aviation, Aviation Administration, Port  
Deborah Ale-Flint, Assistant Director of Aviation, South Airport Administration, Port  
Rob Forester, Airport Operations Manager, Airside, Port  
Douglas Mansel, Airport Operations Superintendent-Airside, Airport Operations Airside, Port  
Cindy Horvath, Senior Transportation Planner, Airport Land Use Commission  
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