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February 5, 2009

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BAY AREA AIR QUALITY
MANAGEMENT DISTRICT

Mr. Weyman Lee, P E
Senior Air Quality Engineer
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Dear Mr. Lee:

Considered thanks are extended to the BAAQMD for the time extension in order to reply to the Document titled "Statement of Basis for Draft Amended Federal "Prevention of Significant Deterioration" Permit.

Many citizens and groups have informed CAP, Citizens Against Pollution, that they have written or contacted the BAAQMD regarding this controversial, Calpine owned power plant which may be permitted to be built close to the boundary of the Hayward Shoreline. CAP opposes the construction of the so named Russell City Energy Center in the western part of Hayward

With regards to the public hearing conducted January 21, 2009 in the Hayward City Council Chambers, I noted that 46 speakers addressed the podium. Thirty-five speakers spoke against this Project. Eleven spoke in favor.

Reading the "Basis" summary and notice of the 1/21/09 meeting, I wish to emphasize that your figures of NO₂, CO, and PM all equal 610.7 tons per year or 1,221,400 pounds per year. This is unacceptable. Those three toxic air contaminants, as your paper states or TAC emissions, are

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combined with others that could be put into our breathable air. These processes of putting toxic air contaminants into the eastern blown air from the large two towers of the RCEC are not at all in the public interest.

This information was written in your published documents. We are not construing any of the numbers. When reading the effects of this kind of pollution, Cap is more than opposed to the BAAQMD's possible support of the Russell City Energy Center.

On page 15, a total of 27 air contaminants is listed. This is a staggering number and is another reason for opposing the RCEC. Unburned hydrocarbons from natural gas combustion, as stated on page 22, consists of methane and carbon monoxide which are both widely known poison gases. The Bay Area is not in compliance with applicable ozone standards and these two additional poisons should not be allowed in our air for any reason at any level of danger to residents. Page 26: Ammonia emissions are another problem and needs to be addressed with a more healthful standard. "A hazard index under 1.0 is considered less than significant." Who sets this standard?

Referring to BACT, "Best Available Control Technology": it seems that the RECE does not have that capability at this time. The "start-up, shutdowns and tuning" as referred to on page 39 show that appropriate technology is not within the RCEC ability at this time. These are reasons to

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deny a Calpine permit. (See Page 43). (See page 49 for limitations)

Quoting from page 66, the Air District's "analysis found that the emissions from the proposed facility would not cause or contribute to air pollution in violation of any National Ambient Air Quality Standard or applicable PSD increment." How can this be? The Air District's very figures say otherwise!

Page 95: ? Where is the following detailed analysis of the potential impacts to visibility, soils, and vegetation from the RCEC ? There is none except from the writings that there are no impacts, Except there are!

AND WHAT IS COMPLETELY UNEXPLAINABLE IS THE FOLLOWING: what is the explanation for "the impacts to special natural, scenic, recreational or historical value." They are only partially listed. The "coastal salt marsh habitat" is actually the home of the salt harvest mouse preserve and is near, about a half mile from the RCEC planned boundaries. It is managed by the East Bay Regional Park District. It is NOT true that the historic salt marsh has been "altered." It has NOT been eliminated at all! The Hayward Shoreline is a most valuable resource for our community and is Part of the flyway for birds flying from Alaska to South America. The Shoreline belongs to the public in the best use of the land and language according to State Law. The entire plant community is vital and important and sensitive. It provides oxygen for all of us to breathe.

A major error on page 95, second paragraph: I learned that plants metabolize and produce oxygen, not carbon monoxide.

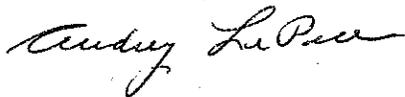
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No comments were written as to the valuable recreational source, that the Shoreline Park provides with its expansive vistas, wildlife, birdlife, and plant life.

Looking towards the east from the Hayward Interpretive Center and the paths along and inside The Shoreline Park does not lend itself to an unhandsome power plant. It looks like an enormous Architected intrusion alongside a relative passive industrial complex.

Lastly, please remember that the California Energy Commission's staff recommended AGAINST THE RUSSELL CITY ENERGY CENTER some two years ago.

Thank you.



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Enc.