

Russell City Energy Center.txt

From: Sara Lamnin
Sent: Sunday, September 13, 2009 11:13 PM
To: Weyman Lee
Subject: Russell City Energy Center

Dear Mr. Lee
Thank you for the opportunity to comment on the PSD permit for the Russell City Energy Center.

I appreciate the efforts of BAAQMD and Calpine to evaluate and mitigate the impacts of the proposed Russell City Power Plant. I agree that this plant is a fine example of business and government working to develop a highly efficient and responsible solution. Nevertheless, this solution is based on a natural gas design - technology known to contribute to greenhouse gas emissions. Greenhouse gas emissions are considered so harmful, that governments throughout the world are evaluating how to decrease their levels as effectively as possible. "As the second largest emitter of greenhouse gases in the United States and about twelfth largest in the world, California's efforts to reduce its emissions will lead the way for other governments, as well as easing the severity of environmental and economic impacts experienced this century." (Energy Commission, 2007) Further, fossil fuel power generation relies on utilizing limited resources, and thus is not a sustainable business model.

I am not clear how issuing this permit is in accordance with the vision and mission of the BAAQMD. Clearly, I am hopeful that all new power generation meets the highest possible standards of environmental responsibility. That said, if this permit is to move forward, everything possible must be done to protect the residents of Hayward and other areas affected by the emissions from this plant. Certainly, the District has researched its perspective, and is inclined to grant the permit. Yet, it seems that there is more research to be done. In reviewing the options for CO limits, the District stated, "Although it appears that an additional reduction below 2.0 ppm may well be feasible based on permits that have been issued to other facilities, the Air District would eliminate it as a BACT requirement in Step 4 of the Top-Down BACT analysis because it is not 'achievable' for purposes of a BACT analysis taking into account cost/economic impacts." What is not articulated is why the costs are so much higher. In determining cost benefit analysis, materials, labor, and other expenses that prohibit such a requirement must be clear. While not all of this research needs to be detailed in the document, the community does need to know that the District's decision is based on factual data as noted in other areas of the permit report.

BAAQMD was the first agency of its kind in the nation when it was founded in 1955. I urge you to maintain your leadership role and work with Calpine to develop a more long-term solution to California's energy needs.

Respectfully,
Sara Lamnin
Resident, City of Hayward