

September 14, 2009

To: Bay Area Air Quality Management District
From: Paul Stelzmann
CC: Pete Stark, Ellen Corbett, Mary Hyashi, Supervisor Gail Steele
Re: Proposed Russell City Power Plant

Dear BAAQMD,

I attended the September 2 hearing at Hayward City Hall and read the supporting documentation for Calpine's proposed Russell City Energy Center. I am a 15-year career chemist and have some opinions about the project that you may find interesting.

I understand that the plant would be permitted to release air pollutants up to the maximum levels decried in the Statement of Basis. These levels are established under the EPA's current 40CFR regulations. *By what criteria are these standards set?* They seem outrageously high to be allowed so close to a residential area. I feel that a release of 330 tons of carbon monoxide per year into the atmosphere is unacceptable from the standpoint of both public health and industrial hygiene.

I understand that your mathematical models predict dissipation probabilities that supposedly render CO and other toxic gases "harmless" to humans. However, these models are only statistical predictions; they may not reliably account for influential variables such as temperature, shifting winds, and the aggregate of other atmospheric pollutants from other nearby industries.

I believe that the California Energy Commission made a bad decision in choosing both this type of plant and the site for it. The argument that alternate energy farms require too much land and do not generate consistent power is not a valid one. I see no evidence that CEC even made an effort to explore or encourage alternate energy options. CEC failed to promote alternate energy plants because of its current policies. This decision does not validate the release of toxins into the air that we all breathe.

I understand that it is not the role of BAAQMD to undermine the CEC. However, BAAQMD is responsible for the stewardship of our air quality. BAAQMD will certainly fail to meet this responsibility by approving this project. BAAQMD has not taken a progressive stance on this issue. From the Statement of Basis, it seems that BAAQMD has merely determined what the existing federal PSD-BACT requirements are for this type of plant. BAAQMD has ignored Hayward's Climate Action Plan and has chosen to adhere to the unwholesome status quo of federal standards.

I do not believe that the people of this community should be forced to accept what is spoon-fed to them by Calpine and CEC. A decision by BAAQMD to approve this project would be both irresponsible and reprehensible.