



CHABOT COLLEGE Fire Technology Program



September 14, 2009

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

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BAY AREA AIR QUALITY
MANAGEMENT DISTRICT

Dear Mr. Lee:

Thank you for the opportunity to comment on the Russell City Energy Center project. I have reviewed the Project Fact Sheet issued by the Bay Area Air Quality Management District regarding the emissions of this proposed facility, and I wish to express my opposition to the issuance of the Federal PSD Permit allowing the construction of this energy center. Speaking as a Fire Captain, Hazardous Materials Technician, and City of Hayward resident, I have significant concerns about the applicability of the conclusions drawn relevant to the impacted area of Chabot College, and such estimates may actually impact the community as a whole more than the report reveals.

According to the conclusions presented in the "Potential Impacts to Air Quality and Public Health," the contaminants released supposedly present no significant impact. These impacts are likely based on exposure limit data for the individual chemicals identified in the report. The risks to the public appear insignificant, if this report is accepted at face value.

However, this facility is not releasing a single chemical pollutant, but multiple chemical pollutants. According to the National Institute for Occupational Safety and Health, along with the Centers for Disease Control and Prevention, the chemicals identified in the project fact sheet are known for health risks ranging from respiratory irritation to cancer to birth defects. Yet, the conclusions drawn from the environmental data in the fact sheet do not reflect the additive or synergistic effects of these chemicals when released into the air and later inhaled by people in the contamination zone. The data only reflects conservative estimates of pollutant emissions and downplays the potential health effects.

All of these pollutants present respiratory hazards. According to the California Specialized Training Institute (under the Governor's Office of Emergency Services), the primary route of hazardous chemical exposure to emergency responders is through inhalation. This is the same for the general public. The actual effect on the human body varies by such factors as gender, age, genetics, respiratory rate at time of exposure, etc., so it is not surprising that the report downplays the cancer risk due to such variables.

The primary impact zone for these pollutants is estimated to range from the football field (at the northwest of Chabot College) to Parking Lot G (at the southeast corner of the college near Hesperian Boulevard and Depot Road). If these estimates are correct, students and the general public who use the outdoor fitness facilities are at the most risk for exposure. When a person engages in physical fitness activities, the respiratory rate increases, the heart rate increases, and whatever is inhaled is more rapidly absorbed into the body. Yet, physical education participants aren't the only ones at risk. Since the Disabled Student Resource Center is adjacent to the Physical Education Complex, students with medical disabilities are at risk for respiratory complications, especially if asthmatic. With the tons of pollutants that will be released annually, the students and general public who use Chabot Facilities are placed at a greater risk for exposure; an issue not significantly considered nor factored into the community impacts by the proponents of the Energy Center.

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Should the estimated contamination zone be slightly off due to a change in wind patterns, the contaminants could be falling onto the Chabot College Children's Center and/or the outdoor athletic areas of Ochoa Middle School. Children are at a greater risk for developmental problems from frequent exposure to certain chemical contaminants, and the hazards released by this facility are of great concern. Also, if the facility exceeds the emissions limits from time to time, the public will be exposed to a greater amount of these emissions, further increasing the respiratory risk.

Since the issues expressed in this letter have not been significantly addressed nor resolved, I urge you to deny the permit at this time. Thank you for your cooperation and consideration.

Sincerely,



Captain Bob Buell, Jr.
Fire Technology Coordinator