DOCKET
04-AFC-1
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August 31, 2005

Jack Broadbent
Bay Air Quality Management District
939 Ellis Street
San Francisco, Ca. 04109

Re: San Francisco Electrical Reliability Project (SFERP)
BAAQMD Application 12344
Comments on the Preliminary Determination

Dear Mr. Braodbent,

CARE thanks you for the opportunity to comment on application number 12344 the PDOC for the San Francisco Electrical Reliability Project. As the district is aware CARE is actively pursuing the closure of the Hunters Point and Potrero Power Plant to ease the environmental burden on the Hunters Point community. The City and County of San Francisco (CCSF) in this application seeks to increase the environmental burden on the Hunters Point residents with the siting of yet another power project. The District's environmental justice regulations should require the rejection of this application in its entirety. The project will increase criteria and toxic emissions in the project area which has been identified by the applicant as overburdened by numerous polluting facilities in violation of environmental justice guidelines in City Ordinance 124-01. The applicant's assertion that this project will somehow reduce emissions in the project area is fostered by the unfounded assumption that the SFERP will initiate the closure of the Hunters Point and Potrero Power Plant. Despite these laudable goals the project will subject the resident of Southeast San Francisco to additional pollution without the certainty of either aging power plant being closed due to the siting of the SFERP. Even if the SFREP were to allow for the closure of either plant the District's environmental justice obligations should prevent the siting of another pollution source in this minority community that is recognized as overburdened by virtually all parties including the applicant , the CEC and all local advocacy groups. The district's state environmental justice goals are defined on the district website

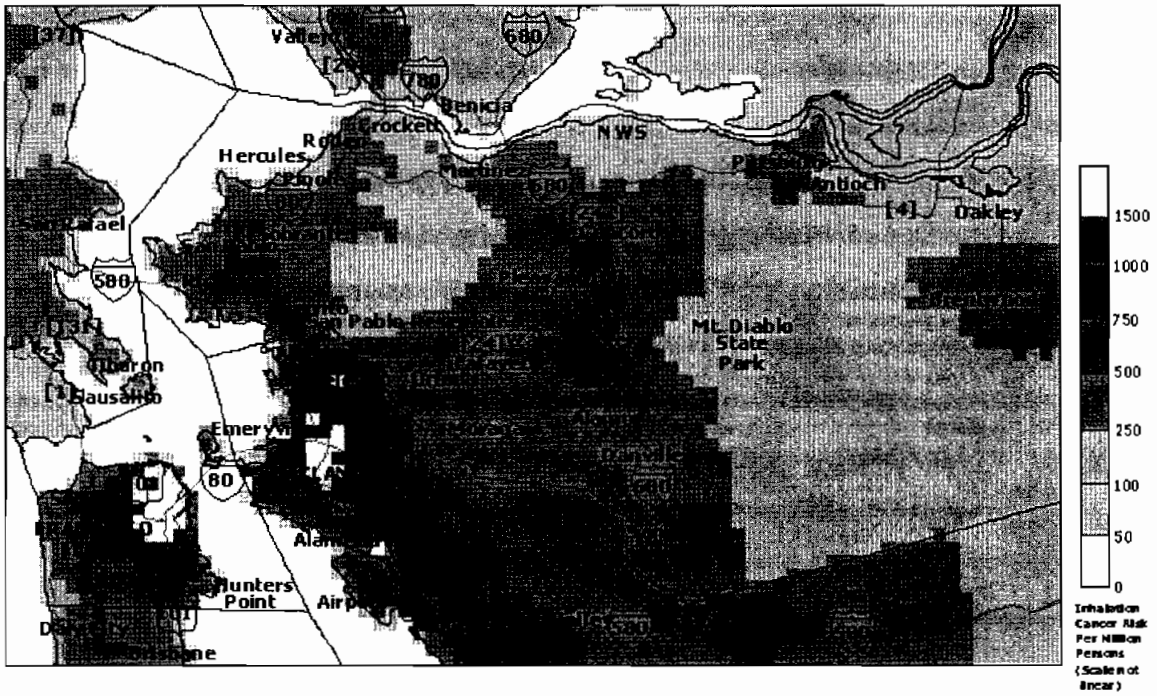
> "The Bay Area Air Quality Management District is committed to environmental policymaking and enforcement practices that are fair and equitable to all residents regardless of age, culture, ethnicity, gender, race, socioeconomic status, or geographic location in order to protect against the health effects of air pollution."

The serious effects of air pollution in the Southeast San Francisco are well documented and the District's commitment to environmental justice requires the rejection of this application.

Cumulative Impacts

Southeast San Francisco already has the highest inhalation cancer risk in the state of California as identified by the CARB website Community Health Map presented below.

Total Risk (diesel + nondiesel)
San Francisco - Oakland : 1990 Cancer Risk Per Million
AllSources



See ARB web site list of sources not yet included in risk.
ARB:EIB:SRF 6/18/2004

This project in conjunction with other projects such as the Muni Maintenance Center the third street light rail project, and numerous other projects associated with the Port Master Plan will further burden this minority community and the PDOC should provide a cumulative analysis of all these projects and their associated health impacts.

PM 2.5 Emissions

The project has PM 2.5 impacts from the direct emissions of 18 tons per year of PM 2.5. The District's Environmental Justice obligations require a supplemental environmental project (SEP)that will offset all of the 18 tons of PM 2.5 emissions from this project. The applicants proposed Street Sweeping PM-10 mitigation will only offset 3 tons of PM 2.5 and will be ineffective during the PM-10 season when fog and precipitation will prevent entrained road dust from becoming airborne. The District should utilize its woodstove program to limit the impacts of the PM 2.5 emissions from this project.

Ammonia Emissions

The project will emit 39 tons per year of ammonia through the use of SCR. Page 10 of the PDOC describes the negative environmental effects of the ammonia emissions

> "The ammonia emissions resulting from the use of SCR may have another environmental impact through potential formation of secondary particulate matter emissions, such as ammonium nitrate. Because of the complex nature of the chemical reactions and dynamics involved in the formation of secondary particulates, it is difficult to estimate the amount of secondary particulate matter that will be formed from the emission of a given amount of ammonia."

The district has performed no analysis of the project area to determine whether these ammonia emissions will in fact not cause a significant impact. Considering the "uncertain and complex nature of secondary particulate formation from the ammonia emissions" the PDOC should provide a local analysis of the formation of Ammonium Nitrate and not a generalization of conditions for the formation of Ammonium Nitrate in the entire Bay Area Air Basin.

The PDOC also fails to recognize that the project's ammonia emissions will produce nitrogen deposition on San Bruno Mountain an impact that has been considered significant by the US Fish and Wildlife service. Biological impacts should be minimized by limiting ammonia slip or eliminating it altogether with the SCONOX technology.

Another potential environmental impact that may result from the use of SCR involves the storage and transport of aqueous ammonia in a 29% solution. The PDOC fails to address this issue. The applicant has modeled a catastrophic failure of the ammonia storage tank Offsite concentrations of greater than 2,000 ppm could occur to the west of the site approximately 35 feet onto the proposed MUNI Maintenance and Operations Center. (AFC Supplement A page 8.12-28) Employees of the Muni Maintenance center could be exposed to a lethal dose of ammonia in the event of a sudden and catastrophic failure of the Ammonia tank. The Ammonia transportation route would also be through the affected minority community where environmental justice concerns should require an analysis of the potential for injuries or the loss of like due to the transportation of hazardous materials. To prevent this potential loss of life the applicant should be required to use ammonia pellets in a Urea on demand system or eliminate the use of ammonia with the SCONOx Control System.

Because of these environmental consequences from the use of SCR the PDOC should evaluate and recommend the use of the SCONOx control system. The District's BACT Guideline Section 89.1.3 for Gas Turbine Simple Cycle greater than 40 Megawatts Heat Input (dated 7/18/03) specifies BACT1 (Technologically Feasible/Cost Effective) for NO_x is 2.5 ppmvd NO_x @ 15% O_2. This BACT determination was based upon the use of SCR and water injection (as applied in the most recent Application #5412, issued 10/15/2002) or a SCONOx System. The EPA has accepted this BACT determination as Federal Lowest Achievable Emission Rate (LAER). CARB has also cited these levels as BACT in its document "Guidance for Power Plant Siting and Best Available Control Technology," June 1999. Since SCR or SCONOx could be used to achieve a 2.5ppm NOx level according to the District's BACT Guidelines the District

should require the use of SCONOx to the eliminate the ammonia impacts form the use of SCR. SCONOx has also demonstrated lower POC emissions than SCR which limits Toxic air contaminates form the SFREP in an area that has the highest inhalation cancer risk in the state of California.

Asbestos

The project area is dominated by serpentine rock formations which contain a high content of naturally occurring asbestos. The PDOC should examine the health effects of the ground disturbance from construction of the SFERP.

Condition 20 Daily Startup and shutdown Limitations

Condition 20 should be retained in the permit to prevent excessive startups and shutdowns which have higher Toxic Air Contaminants (TACs) and Criteria Pollutant emisssions. As illustrated above the project area has the highest cancer inhalation risk in the state of California. and repeated startups and shutdowns will exacerbate Toxic Air Contaminate concentrations in the project area.

Emissions during Startup and Shutdown

The project should be limited to startup of one turbine at a time to prevent cumulative impacts from the startup of all three turbines and the excessive emissions and Toxic Air contaminates associated with this event.

Emission Reduction Credits

The applicant has proposed the use of Emission Reduction Credit 896 which was created in 1985 at the Potrero Power Plant. This credit will be over 20 years old by the time it is surrendered. Due to biological and environmental justice concerns the District should consider a supplemental environmental project to satisfy the projects NOx ERC liability rather than use 20 year old credits which are of little use in limiting NOx and nitrogen deposition impacts in the year 2007 when this project is proposed to come on line.

Respectfully submitted,

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Verification

I am an officer of the Commenting Corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except matters, which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 31st day of August 2005, at San Francisco, California.

Lynne Brown
Vice-President
CAlifornians for Renewable Energy, Inc. (CARE)

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA

APPLICATION FOR CERTIFICATION FOR THE SAN FRANCISCO ELECTRIC RELIABILITY PROJECT	**Docket No. 04-AFC-01** **PROOF OF SERVICE** ***Revised 8/03/05**

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Send the original signed document plus 12 copies to the following address:

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Attn: Docket No. 04-AFC-01
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DECLARATION OF SERVICE

I, Maggie Read, declare that on August 3, 2005 I deposited copies of the attached Order Granting Withdrawal in the United States mail at Sacramento, California with first class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above. Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. I declare under penalty of perjury that the foregoing is true and correct.

_____
[signature]

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