

June Guidotti's comments on the proposed renewal Title V permit for Gilroy Energy Center, LLC at Wolfskill Energy Center and the BAAQMD Responses to those comments:

Application 17174, Facility B4511

1. Deny the renewal permit based on:
2. Objections to initial permitting:
 - a. The applicants are not disclosing all facts and impacts.
 - b. Peaking power plants are less efficient, more polluting, and more expensive to run.
 - c. A superior alternative would be approvable.
3. Objections to initial siting:
 - a. Plant can only be built within marsh if site has greater relative merit than other sites per Public Resources Code 29000. (Various laws would not allow the plant to be built where it is.)
 - b. Study should be undertaken to explore alternatives before locking in a plan that does not address my vested rights and best interests of the public.
 - c. The purpose of designating areas where the siting of power plants is prohibited is to reduce the significant environmental Impacts that these facilities can have on air quality.
 - d. Fossil-fueled power plants can have impacts on biological resources, air quality, water quality, visual access, land use, surrounding community.
 - e. Air quality can have impacts on biological resources, water quality, and community.
 - f. Power plants should be located away from residential areas, in industrial areas.
 - g. Power plants should have technology to prevent pollution.
 - h. Power plants should be designed to reduce visual impacts.
 - i. Power plants contribute to smog, global warming, acid rain, ozone, and eutrophication of water bodies.
 - j. Power plants emit NOx, SO2, CO2, and mercury.
 - k. CO disrupts delivery of O2 to the body's organs. It can affect people with coronary artery disease, congestive heart failure, obstructive lung disease, the elderly, newborn, and fetuses.
 - l. Particulate causes premature death, and aggravation of respiratory and cardiovascular disease.
 - m. Power plants adversely affect air quality in the areas surrounding them. Areas that contain concentrations of generating facilities or older plants that lack emission control technologies receive the greatest air quality impacts. Plants should be sited away from residential areas.

4. Would like to see the EIR for burning gas from the Potrero Hill Landfill.
5. Would like to know how Harry Price, Major of Fairfield is giving water to the people of the place used as PHLF that is not for agricultural use.
6. I need to see what is being planned for Facility B4511 under the new owner, Gilroy Energy.

BAAQMD Response to comments 2a through 2c and comments 3a through 3m

The commenter makes numerous objections to the initial permitting and California Energy Commission siting of this facility as well as the operation of power plants in general. The objections are not timely and not relevant to the District's proposed action, which is limited to renewing the facility's existing Title V permit. Under BAAQMD Regulation 2, Rule 6, the District may deny a Title V permit renewal only if the facility is in non-compliance with any federally enforceable permit condition or applicable requirement. (BAAQMD Reg. 2-6-307). Moreover, before denying a permit renewal due to non-compliance, the District would first attempt to bring the facility into compliance through enforcement action and by adding a compliance schedule with milestones into the Title V permit. (BAAQMD Reg. 2-6-313).

The District has analyzed the compliance record of this facility. The analysis was published in the statement of basis on February 12, 2012. The District found that there was no evidence of on-going non-compliance and no recurring pattern of violations, and thus no need for a compliance schedule. Under these circumstances, the District is obligated to issue the Title V renewal after properly following Title V procedures.

BAAQMD Response to comment 4

Pursuant to permit condition 19684, part 22b, the gas turbine at the Gilroy Energy Center can only be fired on utility-grade natural gas and cannot be fired on landfill gas.

BAAQMD Response to comment 5

Please contact the Mayor's office of the city of Fairfield with any questions regarding this issue.

BAAQMD Response to comment 6

The District is not aware of any future operational changes proposed for the Gilroy Energy Center. Please contact the facility for further detail regarding this issue.