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[Begin CC1]
Comment: The plants are currently allowed to burn diesel fuel under Emergency Conditions.

1. What constitutes Emergency Conditions?
2. How long can a plant operate under Emergency Conditions?
3. Consideration expected increased output of new ownership, what are long-term and short-term health risks while operating under Emergency Conditions at higher output levels, in each of the following categories: newborns, children, teenagers, adults, senior citizens, people with respiratory illnesses. [End CC1]

[Begin CC2]
Comment: Considering the higher output of new owners operating under normal conditions burning natural gas, what are health risks in each of the categories listed above.
[End CC2]

[Begin CC3]
Comment: Considering new status of diesel fuel emissions as toxic, will operations of new owners under Emergency Conditions exceed any legislated standards. Will plant emissions combined with other existing emissions violate any standards?[End CC3] [Begin CC4]If all existing Industrial-zoned areas within the City of Pittsburg become Heavy Industrial, will emissions levels exceed Standards?[End CC4]

[Begin CC5]
Comment: Considering new findings of particulate matter emissions as cause of Respiratory Illness, including death from asthma, what are health risks while plant is operating under normal conditions for each of the following categories: newborns, children, teenagers, adults, senior citizens, people with Respiratory Illnesses? Rate health risks of particulate matter for each of the categories under the following conditions: operating at higher output levels of new owners during Emergency Conditions, plant output emissions in combination with existing industries, potential future emissions if all industrial areas within City of Pittsburg become Heavy Industrial.
[End CC5]

[Begin CC6]
Comment: The City of Pittsburg's expectation and desire is that the lower cost of power, due to the new ownership of Pittsburg PG&E plant and other new planned power plants within the city, will be incentive for increased growth in the industrial base in the area, and that without lower cost locally-available power this could not happen. What is the expected effect this would have on an already over-burdened transportation infrastructure? What are expected health risks from diesel fuel emissions, due to increased rail and heavy truck traffic in the area, on each of these categories: newborns, teenagers, adults, senior citizens, people with Respiratory Illnesses? Rate health risks as above for transportation diesel fuel emissions in combination with increased level of industrial emissions.
[End CC6]

[Begin CC7]
Comment: Considering all of the scenarios and categories listed above; what risks can be expected for the two potential sites for a new Elementary School in the Downtown area? Site A--Next to St. Peter Martyr School on Montezuma Street. Site B--Between Railroad and Black Diamond from 10th and 7th Streets.
[End CC7]

[Begin CC8]
Comment: Considering all of the scenarios and categories listed above, what effect will emissions at "new owner" levels have on Central Valley/Sacramento Air Basin air quality? What will be effect on Central Valley/Sacramento Air Basin air quality if all industrial zoned areas go Heavy Industrial?
[End CC8]

[Begin CC9]
Comment: Considering all of the above; what would be the effect if a condition of sale of the Pittsburg PG&E plant was the new owners use best available technology to control air and noise pollution?
[End CC9]

[Begin CC10]
Comment: Considering all of the above; what would be the effect of new owners not using the property as a power generation plant and being allowed to do some of the following:
A. Residential Development, B. Wetlands/Open Space/Nature Reserve; C. Non-Industrial Commercial Property; D. Considering the existing Marine Dock facility and Storage Tanks the facility may be attractive to someone as a Marine Liquid Bulk Import/Export Facility. What options other than continued use as a power generation facility have been considered? How might these and other options affect the Environmental Quality in the Delta Region?
[End CC10

[Begin CC11]
Comment: Much of the heavy air pollution that affects the downtown Pittsburg are is very localized. Without an air monitoring station in place in downtown Pittsburg, how is CPUC making its conclusions on existing conditions in this area? How does CPUC intend to monitor effects in future and measure compliance? "Best Guess"?
[End CC11]

[Begin CC12]
Comment: Regarding sources of offsets; study designates two Air Basins--South Bay and North Bay. Assumption that offsets in North Bay Air Basin will have actual effect in Pittsburg area needs to be reexamined. Due to extremely heavy nature of Industrial output in Delta region, Carquinez Straights should be considered as separate Air Basin and offsets should be restricted to that area.
[End CC12]

[Begin CC13]
Comment: Considering the extremely high particulate matter pollution in the downtown Pittsburg area, stringent controls and mitigating measures should be enforced.
[End CC13]

[Begin CC14]
Comment: At a recent meeting of the CPUC regarding the PG&E Application for Divestiture; the staff indicated that the air quality in any given 24 hour period would not worsen but that there would be more "worse days" under the new ownership. The contention that this should be acceptable to the community, is ludicrous.
[End CC14]

CC. JAMES B. MacDONALD

CC1 Bay Area Air Quality Management District (BAAQMD) Regulation 9, Rule 11 prohibits PG&E from burning any fuel other than natural gas in the steam boilers, unless the plants are restricted from using natural gas under *force majeure*. A detailed discussion on emergency conditions under *force majeure* is given in footnote #6 on page 4.5-17 of the DEIR. Since 1994, there have been no emergency conditions requiring the use of residual fuel oil, and the PG&E plants have burned only natural gas in the boilers and expect to continue to do so in the future. If an emergency situation were to occur, diesel fuel would not be used, but residual fuel oil might be used for short periods. The acute and chronic health risks from such an emergency condition would be similar to the scenarios treated in the AB2588 health risk assessments (HRAs) that were carried out in 1992. In these HRAs, the maximum acute and chronic health risks (covering all categories of persons listed by the commenter) were shown to be less than the significance levels, which for carcinogenic risks are than 10 in a million and for acute and chronic hazard indices less than 1.

CC2 The health risks were evaluated for all of the maximum operating conditions using natural gas in the steam boilers and distillate in the combustion turbines.

CC3 There will be no diesel fuel emissions at the Pittsburg plant, since there are no provisions for using that fuel. The only power generators that can burn distillate, a derivative of diesel fuel, are the combustion turbines at the Potrero plant. These turbines are permitted to operate no more than 870 hours per year to supply power during times of peak demand. The health risks from burning distillate fuel in the combustion turbines at the Potrero plant were evaluated in the DEIR. The DEIR also evaluated plant emissions (at the plant's Analytical Maximum of operation) combined with existing background emission levels and found no significant impact (see pages 4.5-67 and 4.5-68).

CC4 The Pittsburg Power Plant site lies within the jurisdiction of Contra Costa County, and it is therefore the County's land use designations that govern land use planning on the site. The site is already designated in the County General Plan as Heavy Industrial. With respect to areas within the jurisdiction of the City of Pittsburg that are zoned for industrial use, the commenter's question does not relate to the adequacy of the DEIR or to potential environmental effects that could result from implementation of the proposed project. It would be speculative to conclude that all industrial-zoned lands within the City of Pittsburg would be rezoned for heavy industrial use. The DEIR in Chapter 5, Cumulative Impacts, includes and evaluates all projects proposed in the vicinity of the plants at the time of DEIR preparation.

CC5 There have been several studies published in the last several years that link particulate matter in the ambient air, especially fine particulate matter, to increased respiratory related ailments, including asthma, and cardiovascular disease. A number of these studies attempt to provide a quantitative link between the level of exposure and the degree of illness for various population sectors. However, it is difficult to accurately relate exposure levels to the extent of illness, partly because of confounding factors, such as the role of other

pollutants and because of the wide range of susceptibilities for various sectors of the population. Also see response to Comments F62 and F74.

Even with these uncertainties, the EPA has promulgated a fine particulate matter standard (PM-2.5) to protect the public from exposure. The new PM-2.5 standards, which were promulgated in July 1997, were set to protect the most sensitive populations. The rationales used by the EPA to establish these new standards were also used to asses the impacts of fine particulate matter emissions from the PG&E plants.

The impacts of other existing plants and industries in the area were included by using the maximum particulate matter ambient air concentrations that were measured in the region as the background. These maximum measured values for the regions around the three plants, which are identified in Tables 4.5-29, 4.5-31, and 4.5-32, were added to the modeled concentrations from the PG&E power plants to determine the potential worst-case impacts. Using the maximum background is standard practice when conduct air quality analyses, and is very conservative, since a portion of the measured maximum levels may already include emissions from the existing PG&E plants. Thus, the reported total ambient air PM-10 concentrations may be double counting contributions from the PG&E plants.

Please also see the response to Comment CC4.

CC6 The cumulative analysis described in Chapter 5 of the DEIR identifies future projects in the area that may occur, none of which will generate significant increases in commercial traffic, including diesel operated trucks. Therefore, there are no measurable health risks expected from traffic related to these projects in conjunction with the sale of the Pittsburg plant.

Please also see the response to Comment CC4 and the DEIR's discussion of growth-inducing impacts beginning on page 4.2-7.

CC7 The DEIR reported the maximum health risk contributions from the plant in the area (see pages 4.5-29, 4.5-30 and 4.5-72). The risks from plant emissions were considered to be less than significant. The impacts at other locations, such as those identified in the comment, would be less than the reported maximum risks and would also be less than significant.

CC8 The issue of how emissions in the Bay Area can affect air quality in the Central San Joaquin Valley and Sacramento air basins has been the subject of much debate and study in the past few years. These studies are part of the Air Quality Attainment Plans that are being carried out for both the Bay Area and the San Joaquin Valley, and they include cumulative emissions in each airshed. This issue is complicated by difficulties in being able to accurately quantify emissions from all sources in the Bay Area and in being able to simulate the complicated atmospheric processes involved in the long-range transport of these pollutants. The main issue of concern for air quality in the Central San Joaquin

Valley involves the transport of pollutants that would affect ozone levels in the Valley. The principal ozone precursor emissions from the PG&E plants are nitrogen oxides. The DEIR states on page 4.5-17 that emissions of nitrogen oxides precursor emissions will be reduced from the PG&E steam boilers each year beginning in 1997 until a final reduction of 90 percent is reached by 2005. Thus, the project will not contribute to any cumulative impacts that ozone precursor emissions may have on air quality in the San Joaquin Valley. The commenter's concern for air quality impacts due to heavy industrialization of the area is not an impact of the project since such an occurrence could occur with or without the sale of the plants.

CC9 With respect to air pollutant impacts and the use of Best Available Control Technology (BACT), please see response to Comment U5.

As indicated in the Noise setting section of the DEIR, the Pittsburg plant currently operates within the noise compatibility guidelines of the County General Plan for a industrial land use bordering a residential land use. The analysis in Impact 4.10-2 of the DEIR indicates that increased frequency of operations at the plant would not result in a significant noise impact, relative to noise and land use compatibility. Consequently, there is no requirement (i.e., noise ordinance) or County policy (i.e., General Plan goal or policy) that would obligate a new owner to install additional noise control equipment.

CC10 The Pittsburg plant was assumed in the DEIR to continue operating as a power plant. It is noteworthy that the plant is designated by the Independent System Operator as a "must-run" plant for reliability purposes and the plant site is designated in the Pittsburg General Plan as UT (utility) and zoned for heavy industry. The options suggested by the commenter would require closure of the Pittsburg plant and its replacement by radically different (in three out of four proposed scenarios) operations. Please see response to Comment AA1 for a discussion of the reasons closure of the Pittsburg plant was not analyzed in the DEIR.

CC11 The EIR relies on the best available information to determine both background concentrations and incremental concentrations due to emissions from the Pittsburg Power Plant. For background concentrations, the EIR uses the monitoring data from the Pittsburg monitoring station, which is 0.7 miles south of the plant. Conventional modeling techniques were used to estimate incremental concentrations from the power plant at locations in the vicinity. The two values are added together and then compared to ambient air quality standards or applicable significance criteria (see Table 4.5-32 of the DEIR). Since the localized air quality impact of the project was determined to be less than significant, no mitigation or corresponding monitoring is required.

CC12 Since the project involves existing emissions sources, which are operated under air district permits, and since the estimated emissions increases would require neither permit modifications nor additional permits, no offsets would be required to offset the increases in power plant emissions described in the DEIR.

CC13 The DEIR identifies Mitigation Measure 4.5-5 (on page 4.5-81), which requires a modification of BAAQMD Regulation 9, Rule 11, or a revision to the existing permits to incorporate NO_x emission rate limits, which would apply to any new owner, in substantially the form and stringency in the current BAAQMD Regulation 9, Rule 11. Recent changes in Regulation 9, Rule 11 have banned the burning of fuel oil in the Bay Area steam boilers except for very limited testing and under force majeure natural gas curtailment. This recent revision is a strict measure to limit PM-10 from steam boilers because fuel oil combustion (which would be banned under Mitigation Measure 4.5-5) results in approximately three to four times more PM-10 than natural gas combustion (see DEIR page 4.5-52). No other significant air quality impacts are identified by the EIR.

CC14 The information referred to is contained in Table 4.5-33 on page 4.5-69 of the DEIR. This table indicates how PM-10 emissions would change if the Pittsburg Power Plant was operated at its Analytical Maximum capacity in 1999 and 2005. The table shows what PM-10 levels would result if the plant operated at Baseline or Analytical Maximum levels and if the area experienced worst-case meteorology on every day of the year (an impossible scenario). While the 1999 Baseline results show that 55 percent of the days have a maximum off-site effect of less than 5 micrograms per cubic meter ($\mu g/m^3$), for the 1999 Analytical Maximum, all days are above 5 $\mu g/m^3$. While operations at the Analytical Maximum would raise the PM-10 levels, even on days with worst-case meteorology, the contribution from the Pittsburg Power Plant would always be less than the significance criteria of 20 $\mu g/m^3$. The forecast for Analytical Maximum levels in 2005 is similar to the PM-10 levels in the 1999 Baseline (all forecast days would have average PM-10 levels below 10 $\mu g/m^3$), primarily because the analysis assumes that Pittsburg Units 1 and 2 would be retired before 2005.