

Docket Optical System - CEC Record-docket #11-AFC-03/Quail Brush Power Plant

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Date: 3/11/2012 8:04 PM
Subject: CEC Record-docket #11-AFC-03/Quail Brush Power Plant
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Dear Sirs:

In the following, I will not argue the necessity of the project and the siting as such, although I find it rather surprising that a power plant so close to built up areas is being permitted.

What strikes me as questionable is the following:

For a 100MW fossil fired intermediate/peaker plant, the technology selected is about the most polluting, noisiest, and most noticeable for its size that is available.

The Wartsila gas engines selected have much higher emission levels as far as nitrogen oxides, ammonia carry over, formaldehydes, and volatile organic compounds are concerned, than other fossil fuel based power generation technologies. This applies not only to normal operation, but in particular to the frequent starts and shutdowns of such a power plant. In particular emissions of poisonous ammonia and cancer causing formaldehyde during starts should be a big concern.

The same applies for the noise levels. Since these are slow running gas engines, the emitted frequencies are low, thus will travel very far, and are difficult to attenuate. The site report does not seem to have taken into account the possible noise channeling of Mission Gorge, which could make the noise a big issue even for people living in the San Carlos/Navajo neighborhood. The stated noise levels are high. One would expect for a plant of this size to achieve 40dB(a) at the fence line for all audible frequencies (which is very achievable with available technology). The current noise chart indicates above 80dB(a) at the fence line! It must be noted that every 3 dB(a) noise increase is equivalent to a doubling of the noise.

Further, if indeed there is a justification to site these units at Quail Brush, then it seems sensible that one would use technologies that are inconspicuous, and don't disturb the landscape with massive installations. Other technologies for fossil fired power plants can achieve the same electric output with probably one tenth of the space requirements.

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11-AFC-3

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It seems to me that the planning process from the developer of this power plant has not taken into account the use of more appropriate technologies that are readily available.

Best regards

Dr. Rainer Kurz
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