

DOCKETED

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CalPilots Comments - Opposition to Calpine Russell City Energy Center Reopening

Additional submitted attachment is included below.

June 30, 2021

CalPilots

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Subject: Opposition to Calpine Russell City Energy Center (RCEC) Reopening

Reference: Statement of Staff Approval of Post Certification Change; RCEC (01-AFC-07C)

CalPilots requests a complete investigation as to the cause of the explosions and the FAA be notified to conduct a combined safety risk analysis for both flying metal debris and HRSG thermal plumes. CalPilots requests CalPine Russell City Energy Power Plant (RCEC) not be allowed to startup or operate even in a simple cycle mode. CalPilots considers the Statement by Staff Approval of Post Certification Change Russell City Energy Center (01-AFC-07C) to be inadequate.

Transportation - Aviation is not addressed. According to the news on Channel 7 the Hayward Fire Department put a one-mile evacuation order in place of one mile from RCEC. This would affect aircraft flying the downwind leg of Hayward Executive Airport runways 28L/10R. Post explosion analysis estimates metal fragments up to 50 pounds were found as far away as 1,500 feet from the plant location with comments that estimates of these metal fragments reached heights of a few hundred feet. If these fragments were to reach 1,500 feet vertically, they could hit aircraft flying to and from the Hayward Executive Airport with traffic pattern altitudes of 600 ft. with disastrous results. So exactly what is meant by reaching heights of a few hundred feet? The airspace around this area is used by commercial and general aviation aircraft arriving at both Hayward Executive and Oakland Airports. Does RCEC and the Hayward Fire Department have FAA notification procedures in place when such accidents occur? Was the FAA notified of the explosion? Were pilots warned? What affect would the toxic fumes have on pilots and passengers?

CalPilots requests that a new thermal plume analysis^{1,2} be done while in a simple cycle operating mode. There currently is a FAA navigation chart note instructing pilots to avoid direct overflight of the HRSG stacks due to thermal plume effects on aircraft but not one mile from the HRSG stacks. The thermal plume notice along with flying meal debris could increase the risk to aircraft flying near this area and severely restrict flight operations for both the Hayward Executive and Oakland Airports.

1. FAA AIM, 7.6.15, Avoid Flight in the Vicinity of Exhaust Plumes (Smoke Stacks and Cooling Towers), [Aeronautical Information Manual - AIM \(faa.gov\)](https://www.faa.gov/aim)

2. FAA Mitre Plume Analyzer, [Exhaust Plume Analyzer | The MITRE Corporation](https://www.mitre.org/research/exhaust-plume-analyzer)