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<b>Project Title:</b>	01-AFC-7C Russell City Energy Company
<b>TN #:</b>	238635
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*Comment Received From: City of Hayward  
Submitted On: 7/2/2021  
Docket Number: 01-AFC-07C*

**City of Hayward's Opposition to RCEC's Petition for  
Temporary Safety Modifications; CEC Docket No 01-AFC-07C**

Please see attached letter.

*Additional submitted attachment is included below.*



July 2, 2021

California Energy Commission  
Docket Unit, MS-4  
Docket No. 01-AFC-07C  
1516 Ninth Street  
Sacramento, CA 95814-5512

Re: City of Hayward's Opposition to RCEC's Petition for Temporary Safety Modifications; CEC Docket No. 01-AFC-07C.

### Introduction

As a public agency, the City of Hayward's priority is the safety and wellbeing of the people who live and work here. We understand that the California Energy Commission ("CEC") is similarly concerned with safety. With that shared commitment to public safety, I think we can agree that the safest course forward is to determine the cause of the explosion and remedy the issue prior to the continued operation of the plant. To do otherwise, puts the people of Hayward and plant employees at risk. A full and thorough investigation will go a long way in reassuring the public that the plant is safe and that the CEC is fulfilling its commitment to safety.

### Explosion's Impacts on the City

Russell City Energy Center ("RCEC") is a combined-cycle natural gas fired power plant located in the City of Hayward. On or about May 27, 2021, RCEC suffered a catastrophic explosion in one of its turbines. The explosion sent shards of metal thousands of feet away and may have released unknown pollutants into the atmosphere, the surrounding area, and waterways. Nearby City facilities suffered direct damage from the explosion including, but not limited to, the Housing Navigation Center<sup>1</sup> and the Water Pollution Control Facility ("WPCF").

A fifteen-pound portion of the metal debris pierced the roof of one of the units at the Navigation Center, melted the carpet, and caused yet to be ascertained damages. Through nothing more than luck, the trailer was unoccupied at the time, with the Navigation Center's clientele asleep in nearby facilities. Many other pieces of metal, one weighing over fifty pounds, fell on the WPCF property. During the day shift, over thirty City staff members work at the facility. There was also a report by a driver of a vehicle on State Route 92 that his vehicle was hit by an unidentified piece of metal around the time of the explosion. It is not hard to see the potential for fatalities if

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<sup>1</sup> The Housing Navigation Center provides transitional housing for individuals experiencing homelessness.

this situation occurs again.

The WPCF was also littered with the unidentified metal. These metal shards could have damaged critical infrastructure at the facility or injured a City employee. Hayward first responders may have also suffered from exposure to various compounds encountered while fighting the blaze at the power plant. Breathing issues were also reported by City employees working at the WPCF. Assessment of damages is still underway, but it is clear that RCEC suffered a catastrophic explosion.

### Public Safety Demands that the Cause of the Explosion be Determined Prior to Resumption of Operations

RCEC first went online in 2013. A catastrophic explosion should not occur at such a young facility. Indeed, it would appear that the cause has to fall within two categories: 1) negligent operation and maintenance, or 2) defective materials, installation, or design. Either category is cause for concern, a full investigation, and remedial measures. Allowing RCEC to resume operations without a full and complete investigation and without implementing measures to prevent a similar occurrence is an unjustifiable gamble with the public's safety.

### Critical Infrastructure

The City's WPCF is a critical facility that prevents environmentally deleterious materials from entering into San Francisco Bay. Damage to this critical facility puts the entire bay in jeopardy. Safeguards, such as blast shields or other containment apparatus, need to be put into place prior to the reactivation of RCEC to prevent damage to the City's critical infrastructure. After all, regional energy needs are being met without RCEC's peaker-plant, the same cannot be said if the Water Pollution Control Facility is rendered inoperable by the next explosion.

### Unknown Environmental Impacts

Allowing RCEC to return to operations by implementing the proposed temporary modifications would be irresponsible prior to the completion of the investigation into the cause of the incident and into the environmental impacts of the proposed modifications. The City notes that modifications proposed by RCEC have not been thoroughly studied. Nor have the modifications, and conclusory statements regarding their environmental impact, been peer reviewed.

The City is concerned that the modifications may impact air quality in the surrounding area. According to RCEC, the gross amount of pollutants, which is primarily related to the operation of the gas turbines, is not likely to change. However, because the gross amount would remain nearly the same but the amount of generated power reduced by 40% to 50% (from 600 MW to 300 to 350MW), the amount of pollutants emitted per unit of energy produced would **nearly double**. The City, and California in general, do not need or desire this dirty power.

Air quality in the immediate area of the plant impacts some of the least affluent neighborhoods in the Bay Area. Full studies need to be completed to ensure that the most vulnerable among us do not suffer any increased air pollution at a time when respiratory health is critical. The rush to

reopen the plant without quantifying the environmental impacts is unjustified and presents an environmental justice issue.

### Conclusion

With the public's safety and critical infrastructure on the line, the CEC should proceed with extreme caution in evaluating the continued operation of RCEC. The City urges the CEC to complete its investigation and issue requirements for safety upgrades prior to allowing RCEC to resume operations. To do the contrary, would constitute an unnecessary risk to the public's safety.

Sincerely,



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Kelly McAdoo  
City Manager, City of Hayward

Cc: Mayor and City Council  
Michael Lawson, City Attorney