

From: [Jewell Hargleroad](#)
To: [Alexander Crockett](#);
cc: [Weyman Lee](#); [Public Records](#);
Subject: Fwd: Request for Records Relied On: RCEC applica. 15487
Date: Friday, February 19, 2010 12:05:09 PM

Sandy,

First, I would just like to clarify that on September 1, 2009 we did receive the output files for the 24-hour project only PM 2.5 runs with the emissions rate of 1.134 g/s. To date we have not received any files, however, with any 24 hour project only PM2.5 runs utilizing any other emission rates which BAAQMD's February 4, 2010 responses to comments states it relied on.

This also confirms that your public records department did provide me with the following CALPUFF files entitled as follows: 1. a one page untitled document identified as "Cal-Puff Letter-1.pdf"; 2. a zip file entitled "PTREYES_CALPUFF.zip"; and 3. a zip file entitled "PINNACLES_CALPUFF.zip"

Other than these attachments described above, to date I have not received any of the other requested memoranda listed below. I appreciate it that our request was made on Friday, February 12, 2010, however, as you are aware, time is of the essence and I would appreciate learning when BAAQMD intends to provide these requested documents. I look forward to your prompt response. Thanks

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Begin forwarded message:

From: Jewell Hargleroad <jewellhargleroad@mac.com>
Date: February 12, 2010 5:02:58 PM PST

To: Weyman Lee <weyman@baaqmd.gov>

Cc: Alexander Crockett <ACrockett@baaqmd.gov>, Public Records <publicrecords@baaqmd.gov>

Subject: Request for Records Relied On: RCEC applica. 15487

Weyman:

On September 1, 2009, I made the following request on behalf of Chabot-Las Positas Community College District:

This confirms our telephone conversation this morning concerning obtaining the AERMOD/SCREEN3 modeling files for the Russell City Energy Center application.

As we discussed, we would like all modeling files (*input and output*) of both AERMOD and SCREEN3. For AERMOD, please also provide all meteorological input data, including the 2003-2007 meteorological input data.

As I mentioned, once these files are placed on a CD, we can either have the CD picked up from your offices or you can overnight the CD to me, whatever works easiest for you and enables us to obtain the files sooner rather than later. As we discussed, we would like to have them as soon as possible so that we have adequate time to review them to incorporate any comments by September 16, 2009.

Thanks very much for assisting us on this. So that we have some idea on scheduling, please let me know when your office anticipates having these available.

Emphasis added. That same day, Sandy Crockett emailed the following message-

According to our modeling folks, all of the files you are interested in are already on a CD that is included with the publicly available permitting record documents open for public review here in our Communications and Outreach Division offices. I will have a copy of the CD made and sent to you

They were copied that same day and I had a messenger pick up the CD. Sandy also confirmed on September 1, 2009 the following: "Public Records coordinator know that you had requested information, just to keep her in the loop. She assigned your request a District PRA tracking number, for District administrative purposes. It is: 09-09-02_Hargleroad. [P]This will confirm that the District has fulfilled this request for Public Records."

The February 4, 2010 response to comments at p. 160 states the following:

The commenters stated that they used an emission rate of 1.134 grams per second (g/s),

which they note is higher than the rate of 0.945 g/s specified by the applicant's Source Impact

Analysis. Apparently, the commenters selected the wrong emissions rate because the

commenters had relied upon an outdated modeling report generated by the Air District, which

used the combustion turbine/HRSG emissions rate proposed in the December 2008 Draft Permit

(9 lbs/hr), rather than the reduced emissions rate (7.5 lb/hr) proposed in the August 2009 Draft

Permit and in the modeling reports referenced in the Additional Statement of Basis. (The higher

emission rate of 9 lb/hr equals 1.134 g/s.)

This confirms that the emissions rate in the air modeling files your District provided to us in response to your public records request on September 1, 2009 used an emission rate of 1.134 g/s, which is the same rate that our modeling used.

Now you contend that rate is incorrect and you did not use that emissions rate. Please promptly provide all modeling files (**input and output**) of both AERMOD and SCREEN3 that you relied on; in this regard, this confirms that the September 1, 2009 files did NOT include your output data. Please include that output data as well this time.

The February 4, 2010 response to comments at p. 161 claims: "The Air District used the same publicly-available AERMOD program as the commenters did, and the discrepancy in the commenters' results comes from the fact that they used incorrect inputs, . . ."

No citation to any document is provided to support this assertion. As we informed you, our modeling used the identical inputs and emission rates the District provided in the air modeling files provided on September 1, 2009. Please promptly provide what documentation, including any communications, the District relies on to make this assertion, including the identification of what inputs were incorrect.

At page 168, the February 4, 2010 response to comments states "the applicant provided an updated CALPUFF modeling analysis for the impact of the project's emission on Point Reyes National Seashore." Also on that page footnote 333 refers to the following: [Summary of CALPUFF Class I Modeling Analysis Results, prepared by Greg Darwin, Atmospheric Dynamics, October 14, 2009.](#)"

Please promptly provide a copy of that summary referred to in footnote 333. Please also promptly provide all modeling files (*input and output*) of the CALPUFF modeling upon which the District relied and refers to in the February 4, 2010 response, pp. 167-168.

Lastly, please provide a copy of the [Memorandum from G. Darwin \(Atmospheric Dynamics\) to G. Long \(Bay Area Air Quality Management District\), September 28, 2009](#) identified in footnote 322.

Please let me know when these documents and air modeling files will be available for pick-up. Of course, we are willing to accept anything that can be transmitted via email to make satisfying this request easier. As you know, time is of the essence. If you have any questions, please advise.

Thank you for your prompt attention in this matter.

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