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5/28/08

RE: Hazardous Materials Section of the PSA for the public record:

Mr. Christopher Myers:

Terrain Characteristics

The location of elevated terrain is often an important factor in assessing potential exposure. An emission plume resulting from an accidental release may impact high elevations before impacting lower elevations. The site topography is predominantly flat (about 58 feet above sea level), and the surrounding area is at a similar elevation in all directions (MMC 2007b, Section 5.1.2.2).

The Otay River is adjacent to this site on the south. It is substantially lower than the site. Across the river there is a low shelf and then a high ridge. It is not accurate to characterize the areas around the site as flat.

Albany Headstart and the CVESD pre-K program as well as the senior lunch program and the Otay Recreation Center are closer than the Elementary School itself. Also there are at least 60 homes that are closer.

Ammonia

Indeed the existing peaker has a RMP, but that report gives 80% credit to polyballs, which are a controversial technology and cannot be trusted to protect the public from the [dangers of an accidental or intentional spill](#). Actually even with the polyballs in the event of a spill ammonia would reach the parking lot of Heartland Meat to the west where there are always workers in the parking lot. I do agree that children are of more concern, but since workers park in this area leaving would be problematic in the event of a spill. The workers on the east are much closer. If the polyballs fail to contain the spill as they are projected to do the danger area is 1,000 feet, which includes many homes with children as well as many workers and a very busy public street.

At 210 feet the ammonia has the potential to reach beyond the buildings to the east, which are a mere 20-30 feet from the fence line. This is of great concern to the workers. Considering that MMC and its employees have been lying to us continuously about such things as permits and contracts, we really have no faith in their concern for our health or safety and consider having this quantity of aqueous ammonia this close to sensitive receptors (employees to the east and the west) absolutely unacceptable.

Considering that the facility is staffed only part time the risk of vandalism or treachery is too great. The frequency of inspection by the County is woefully inadequate to reassure anyone. We do not know what staff considers an adequate response time since it is not stated in the PSA, but we do know the traffic problems in this area and traveling

15 miles during rush hour would take an hour or more from the sites mentioned in San Diego.

Transportation of Hazardous Materials

We are concerned by the comment that “many types of hazardous materials” will be transported to this site. Just exactly what are we referring to?

The proposed plant does need to redo the business plan and RMP and off site impacts, because as they admit the existing plant never had an ammonia delivery but they are projecting one or two per month. Even one or two ammonia trucks coming through our community are a cause of concern.

Isn't a risk of 14/45 in one million significant? It certainly would be for the specific people involved, and it is higher than 10 in a million. The problem with these estimates is that all this data has been amassed from a time with relatively few peaker and other power plants. There has been a huge increase in the past few years of peaker plants in California. Logically this would mean the odds of one of these accidents occurring at a specific peaker would be steadily increasing. It is a good restriction that the trucks will not be on Main Street when school buses are also on the street, but who is going to monitor this? Are you aware that SUHSD has been planning to move their bus garage from Fifth Ave. and one of the potential sites is Main Street? What about the public buses that also frequent Main Street? Coming down Main from I-805 the truck would pass several condominiums and a number of single- family homes. The trucks should also be required to travel in the left hand lane at the center of the road to keep them further away from homes. We do not believe even that will minimize the risk adequately since this road is highly traveled by large cement trucks and other large vehicles (including buses since there is a bus garage along the route), which means even a small accident could cause a large amount of damage to the truck.

Exactly what other hazardous materials will they be transporting to this site and with exactly what frequency? The comments in the PSA are quite vague.

Seismic Issues

Why are you not requiring the replacement of this old ammonia tank when your research shows there was a problem with old tanks but not with new ones? This site is in the vicinity of an assumed earthquake fault (the discrepancy in height of the two sides of the valley are an indicator). It has been a long time since an earthquake in San Diego, which increases the risk of one occurring.

Security

The RMP is totally inadequate in this area since it only deals with the release of ammonia. There are a lot more issues as noted in the PSA. The current lack of security is totally unacceptable. Security needs to be 24/7. This site is adjacent to the Otay River with a large homeless population. Eventually they will become aware of the amount of valuable metals etc. left totally unguarded at this site. The chain link fence now around the existing plant would be very easy to climb or simply cut with wire cutters. It really is surprising this has not been done yet, although they did mention there were some break ins when PG&E essentially abandoned the site several years ago.

Any site with explosive materials in San Diego, due to the large military presence, should be considered a possible terrorist target. There recently was a bombing at the superior court building downtown. We wonder if Medium Vulnerability is a sufficient assessment. The buildings on both sides of this site are empty at night and mostly on weekends. To the South is the OVRP open space preserve, which is occupied at night only by the homeless and potential vandals. There actually would not be any witnesses to any entry to the site during non-business hours and there would be many places where none of the businesses would notice unlawful entry during the day. Here we have a very vulnerable site, and we have two major roads near by and a lot of places to hide.

We do not think 24/7 video monitoring is adequate unless the cameras are monitored 24/7 by someone ready and willing to summon police immediately.

Cumulative Impacts

Doesn't the SBBP use ammonia and other hazardous materials? Don't the gasoline and oil in the numerous vehicles in the various lots, businesses, bus garage, garages, gas station on the corner, etc. within a mile of this site count as hazardous materials? The bus garage across the street also uses highly pressurized natural gas. We believe there are many places where hazardous materials (different than ammonia) are stored and used near by.

Conditions of Approval

All residents and businesses within 1,000 feet need to receive (in English and Spanish) a list of all hazardous materials stored on this site, what the dangers of each are, and how MMC plans to store them. They also should receive a copy of the emergency plan for dealing with any accidental or deliberate spill or release for each one of these hazardous materials and a copy of MMC's insurance policy guaranteeing the company has adequate coverage to pay any and all medical expenses incurred by workers and residents near-by in the event of a spill or release of a hazardous material.

MMC should be required to have two entrances in order to comply with fire regulations. This is important for the safety of employees and for facilitating the efforts of fire personnel in the event of a fire or other emergency.

Sincerely,

Theresa Acerro
President of
Southwest Chula Vista Civic Association.