

Coal-Fired Power Plants In Fresno County: Necessary Energy Or Unnecessary Air Pollution?

by Nicole Lance

Earlier this year, GWF Power Systems (GWF) proposed a plan to build two coal-fired cogeneration power plants in Fresno County, California. The plants will provide electricity for sale to PG&E and steam for sale to adjacent wineries. In late August 1988, the Fresno County Planning Commission unanimously rejected GWF's plans. The Board of Supervisors will make a final decision on the plans in January 1989 when it considers GWF's appeal of the Planning Commission ruling. In the meantime, public debate continues over the proposal to build these power plants. Environmental groups charge that GWF's proposed plants pose serious environmental problems. GWF argues, however, that the plants will provide the energy necessary to meet increasing demand and that opponents have exaggerated the plants' adverse environmental impacts.

GWF claims that the plants will prove environmentally beneficial. It promises that the plants will cause a twenty five percent net decrease in particulate and nitrogen oxide emissions, substances which substantially contribute to air pollution. GWF will achieve this goal using two approaches. First, GWF will retrofit and improve older local plants' emission controls. Second, GWF will buy offsets from utilities and industrial plants which operate below their maximum emission levels allowed under the Clean Air Act (CAA). GWF intends to buy the offsets in order to "take them off the books" and reduce total local air pollutant emissions, rather than offsetting their own allowable emissions, thereby allowing emissions beyond the applicable CAA standard from the two plants. The plan's two components are completely voluntary; no environmental law, including the CAA, requires GWF to fulfill either promise to reduce local air pollution.

Environmentalists criticize GWF's rosy picture. They do not believe that two additional power plants will reduce pollution. Environmentalists agree that buying offsets may reduce pollution caused by particulates and nitrogen oxides, emissions typically released by stationary polluters (ie. factories). But environmentalists also point out that buying offsets will not reduce mobile emissions caused by vehicles traveling to the new power plants. More importantly, the area's already precarious environmental condition dictates against allowing further power plant construction. According to expert testimony before the Board of Supervisors, Fresno County "is already a non-attainment area for [carbon oxides, oxides, and

particulates] with continued rapid growth and no immediate viable way to reduce these pollutants.... [Moreover], the San Joaquin Valley has the highest air pollution potential in the U.S. due to its being [sic] surrounded by mountains and the presence of temperature inversions...." Environmentalists claim that no matter how clean the air seems, any unnecessary emissions in the San Joaquin Valley pose a serious threat to the area's precarious air quality.

Plant opponents also question GWF's environmental impact report's (EIR's) adequacy because the document fails to explore cleaner alternative fuel sources. While experts disagree on the extent to which coal pollutes, consensus exists that coal adversely alters climate because of its impact on the ozone layer. The National Park Service (NPS) indicated that its own modeling analyses show that ozone and ozone precursors originating in the San Joaquin Valley "contribute to ozone in Sequoia National Park during upslope wind conditions." Furthermore, the NPS report points out that the affected area "exceeds the ambient air quality standards for ozone and PM-10." Yet GWF's EIR fails to look at alternatives to coal which would eliminate many of these adverse air quality impacts.

GWF's response to concerns regarding coal use focuses on its use of state-of-the-art technology. This technology meets the California Energy Quality Agency's design standards. As evidence of its commitment to "safe" technology, GWF points to its Torrance power plant, certified by the South Coast Air Quality Management District (the local regulatory agency) as using the "best available control technology" (BACT). BACT, however, constitutes the emission standard which all new plants must meet under the CAA.

While GWF's plant designs may meet the California Energy Commission's (CES's) emission standards (the applicable standards under the CAA), GWF is not legally required to actually meet these standards. This regulatory loophole occurs because the CES has no jurisdiction over any power plant's emissions when the plant's energy output measures less than 50 megawatts. Although GWF's two proposed plants will be only eight miles apart, current air pollution regulations allow the local regulatory agency to treat the plants separately. Thus, while the two plants' combined output exceeds the 50 megawatt minimum for CES jurisdiction, when considered individually, the plants do not fall under CES

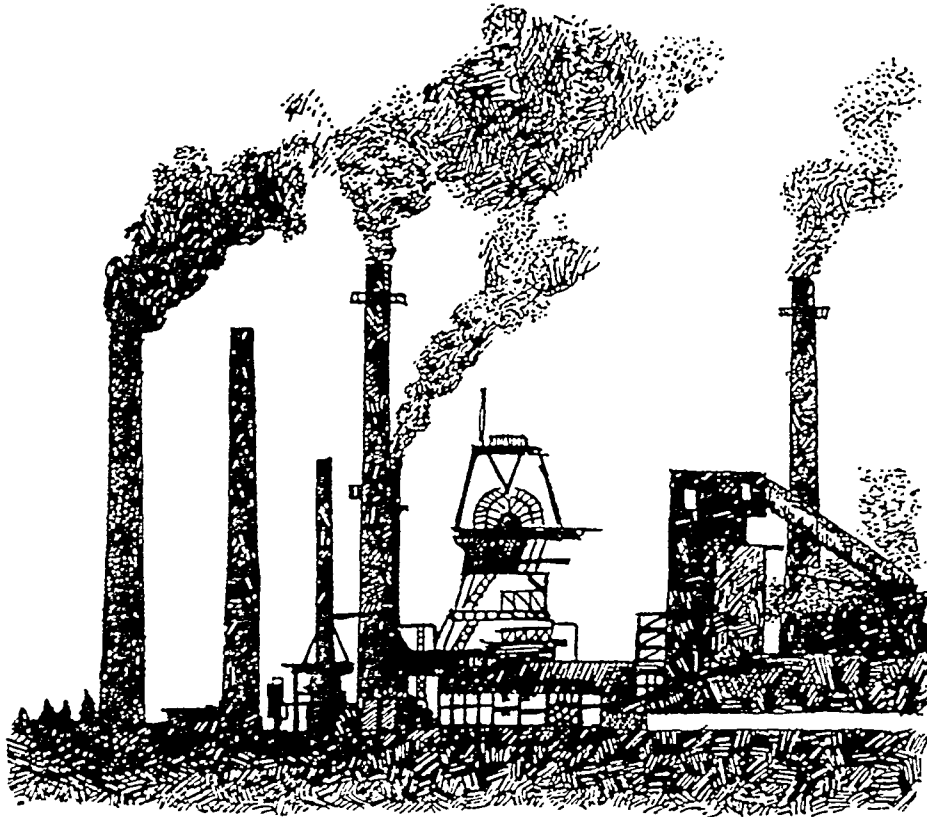
jurisdiction. Plant opponents argue that the plants' close proximity should allow CES to consider the two plants as a whole when assessing the air pollution impacts. GWF would then be forced to provide additional offsets to compensate for the plants' combined emissions.

If the Board of Supervisors, in ruling on GWF's appeal, agrees with GWF's prediction of PG&E's increased energy demand by the early 1990s and accepts the GWF's EIR as adequate, opponents say they will file suit to challenge the plan. They believe that absent a convincing showing of need, why should GWF further pollute San Joaquin Valley's air,

which currently fails to meet federal air quality standards?

EDITOR'S NOTE: In January 1989, the Fresno County Board of Supervisors postponed its decision regarding GWF's power plant proposal pending further studies. The Board of Supervisors will make a final decision sometime in November 1989.

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Food Irradiation: A Snag In the Seamless Web

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INTRODUCTION

On April 18, 1986, the Food and Drug Administration (FDA) published regulations permitting broad use of food irradiation, including, for the first time, fresh fruits and vegetables. 51 Fed. Reg. 13,376 (April 18, 1986). These controversial new regulations

have garnered support from a curious alliance: the food processing industry and the Department of Energy (DOE). Food processors see food irradiation as a potential multi-billion dollar industry. The DOE sees food irradiation as a means to rid itself of large amounts of nuclear wastes generated by nuclear