



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

FEB 13 2002

OFFICE OF  
AIR AND RADIATION

Mr. Gregory Rueger  
Designated Representative  
Mail Code B32  
Pacific Gas and Electric Company  
P.O. Box 770000  
San Francisco, CA 94177-0001

Re: Petition for alternative requirement for calculating CO<sub>2</sub> at Humbolt Bay Power Plant,  
Unit 2

Dear Mr. Rueger:

The United States Environmental Protection Agency (EPA) has reviewed the petition, submitted by Pacific Gas and Electric Company (PG&E) on December 11, 2001, under §75.66(a) for Unit 2 of the Humbolt Bay Power Plant, ORIS Code 246. The petition requests to use Equation G-4, rather than Equation G-1, from Part 75, Appendix G for calculating and reporting carbon dioxide (CO<sub>2</sub>) emissions for Unit 2, although that unit no longer qualifies as a gas-fired unit. As discussed below, EPA approves the petition.

Background

Unit 2, at the Humbolt Bay Power Plant, is a gas-fired boiler that burned a sufficient amount of residual fuel oil in 2001 to result in a loss of gas-fired status for 2002. Therefore, the unit is now required to calculate CO<sub>2</sub> emissions using Equation G-1. In its petition, PG&E requests to continue to use Equation G-4 in 2002.

EPA's Determination

Although Appendix G, Section 2.3 currently restricts the use of Equation G-4 to gas-fired units, EPA has no technical reason to prohibit the use of this equation by oil-fired units. Further, allowing the use of Equation G-4 for oil-fired units will enable PG&E to report hourly CO<sub>2</sub> emissions in tons per hour, instead of tons per day as calculated by using Equation G-1. This will simplify the reporting of emissions for the unit, as well as enable EPA to perform electronic audits of the CO<sub>2</sub> emissions reported. Therefore, EPA grants PG&E's request to use Equation G-4, in lieu of Equation G-1, for Unit 2 of the Humbolt Bay Power Plant beginning January 1, 2002.

EPA's determination in this letter relies on the accuracy and completeness of PG&E's December 11, 2001 submission and is appealable under Part 78. If you have any questions regarding this correspondence, please contact Matthew Boze at (202) 564-1975.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian J. McLean". The signature is fluid and cursive, with a long horizontal stroke at the end.

Brian J. McLean, Director  
Clean Air Markets Division

cc: Steve Frey, Region 9  
Wayne Morgan, NCUAQMD  
Richard Flander, PG&E