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 CO₂ at Humboldt 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 Humboldt 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 (CO₂) 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 Humboldt 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 CO₂ 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 CO₂ 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 CO₂ 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 Humboldt Bay Power Plant beginning January 1, 2002.

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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,

Brian J. McLean, Director
Clean Air Markets Division

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