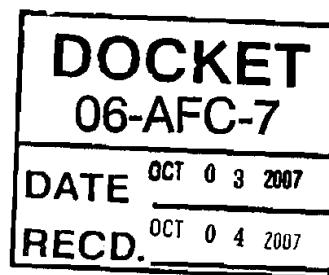


From: John Kessler
To: Docket Optical System
Date: 10/3/2007 9:46 AM
Subject: Fwd: Response to HBRP Data Request 10-2-07



Please docket this email to Humboldt (06-AFC-7).

Thank you,

John

John S. Kessler
CEC - Project Manager
Office: 916-654-4679
Cell: 530-306-5920
Fax: 916-654-4421

>>> "Rick Martin" <rmartin@ncuaqmd.org> 10/3/2007 9:10 AM >>>

FYI - PG&E's explanation for the 30% control for PM emissions while firing on natural gas as well as liquid fuel. Does ARB and CEC agree with Greg's response? It sounds like the Bay Area test was a result of requests from ARB and CEC. Wartsila is now guaranteeing 30% less PM after the stack tests in the Bay Area.

FYI - We are currently working on revising the ATC. We are trying to have it done by the end of the week for review. We will distribute to everyone for review as soon as possible.

Does anyone have any questions or comments?

Thanks

Rick

----- Forwarded message -----

From: Greg Lamberg <greg.lamberg@radback.com>
Date: Oct 3, 2007 8:54 AM
Subject: Response to HBRP Data Request 10-2-07
To: Jason Davis <jdavis@ncuaqmd.org>, Rick Martin <rmartin@ncuaqmd.org>
Cc: Gary Rubenstein <GRubenstein@sierraresearch.com>, "Nancy L. Matthews" <NMatthews@sierraresearch.com>, sgalati@qb-llp.com, SUSAN STRACHAN <strachan@dcn.davis.ca.us>, Doug.Davy@ch2m.com, kforn_pe@sbcglobal.net, "Jerry P. Salamy" <jsalamy@ch2m.com>, Jon Maring <J8M4@pge.com>, Patrick Mullen <PWM3@pge.com>, "Callendo, Ian" <IxC8@pge.com>

Dear Jason and Rick:

The following is in response to the Data Request you forwarded yesterday afternoon. We have restated your question, followed by our response:

Q: The application revision projects particulate matter emissions at levels 30% below those previously reported. Particulate matter reductions achieved by the OC are only of significance when the units are fired on 100% diesel fuel. Please substantiate the 30% particulate matter reductions claimed during normal (gas fired) operation.

R: The revised particulate emission rates during gas firing reflect reductions in the particulate emission rates indicated by Wartsila, the engine vendor. These reductions, in turn, were a result of a review of recent source test results from other large Wartsila gas-fired engines. This review was initiated at the request of the staffs of the California Air Resources Board, California Energy Commission, and Bay Area Air Quality Management District in the context of another project proposed and currently proceeding through the licensing process in California. Wartsila determined, based on this review and a better understanding of the source test methods likely to be required to demonstrate compliance, that a particulate emission rate of 15 mg/Nm3 (corrected to 15% O2) could be achieved on a consistent basis for both the 34SG engines proposed in the other project, and for the 50DF engines proposed for the Humboldt Bay Repowering Project while operating on natural gas. This 15 mg/Nm3 emission rate is equivalent to 3.6 lbs/hr at full load for the engines proposed. This particulate emission rate for gas firing does not reflect any assumed benefit from the oxidation catalyst.

If you have any additional questions or require more information, we would be pleased to respond. We appreciate your continued review and diligence and look forward to receiving the Preliminary Determination of Compliance within the next two weeks.

Very truly yours,

Greg Lamberg
Senior Vice President - Development
RADBACKENERGY
P.O. Box 1690
Danville, CA 94526
Greg.Lamberg@Radback.com
916.799.9463

From: Jason Davis [mailto:jdavis@ncuaqmd.org]
Sent: Tuesday, October 02, 2007 3:08 PM
To: greg.lamberg@radback.com
Cc: Rick Martin
Subject: HBRP Data Request 10-2-07

Mr. Lamberg,

The NCUAQMD is in receipt of the ATC application revisions and is in the preliminary stages of the review process. Issues with the oxidation catalyst (OC) control efficiencies immediately became evident earlier this week. The District hereby requests clarification of the following.

The application revision projects particulate matter emissions at levels 30% below those previously reported. Particulate matter reductions achieved by the OC are only of significance when the units are fired on 100% diesel fuel. Please substantiate the 30% particulate matter reductions claimed during normal (gas fired) operation.

Regards,

--

Jason L. Davis, Division Manager
NCUAQMD
(707) 443-3093

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Rick Martin
Air Pollution Control Officer
North Coast Unified Air Quality Management District