February 14, 2008

Gerardo Rios Chief, Permits Office US Environmental Protection Agency Region IX 75 Hawthorne Street San Francisco, CA 94105

Re: Revised Modeling for Increments Analysis Humboldt Bay Repowering Project, Eureka, CA

Dear Mr. Rios:

On February 6, 2008, we submitted responses to EPA's November 23, 2007 comments on the Preliminary Determination of Compliance (PDOC) and supporting engineering evaluation prepared by the North Coast Air Quality Management District (NCUAQMD) for the proposed Humboldt Bay Repowering Project (HBRP) in Eureka, CA. These responses included a revised version of the complex terrain portion of the increments analysis that uses the CTSCREEN version of the CTDMPLUS model to address EPA's concerns regarding the acceptability of the meteorological data with the CTDMPLUS model.

Enclosed please find a CD containing the CTSCREEN-related modeling files used to prepare the supplemental modeling analysis.

If you or your staff have any remaining questions regarding the proposed project, please do not hesitate to call.

Sincerely,

Gary Rubenstein Senior Partner

Enclosure

cc: Richard L. Martin, Jr., NCUAQMD John Kessler, CEC Greg Lamberg, Radback Energy Scott Galati, Galati Blek LLC Susan Strachan, Strachan Consulting

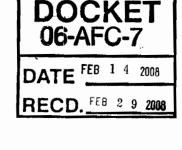
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