

**North Coast Unified Air Quality  
Management District**  
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<http://www.ncuagmd.org>



July 15, 2019

Charles Holm  
General Manager  
Humboldt Bay Generating Station  
1000 King Salmon Avenue  
Eureka, CA 95503

Dear Mr. Holm

This letter is in response to your inquiry via email on July 1, 2019 about permit compliance of the Humboldt Bay Generating Station (HBGS) during statewide PG&E Public Safety Power Shutdown (PSPS) events. You advised that while operating isolated from the rest of the grid or system that it is expected that one or more engines will be producing a base load and that there will be at least one engine that will be ramping up or down to absorb the fluctuating demand. You also indicated that PG&E is concerned that this engine(s) most likely will end up dipping/spiking below 8MW to react to this fluctuation and that there was concern of violating the 50% limit as stated in Condition #111.

The North Coast Unified Air Quality Management District (District) recognizes that the Title V permit does not currently indicate whether this is a single instantaneous limit or an hourly average. Upon review, the District believes the intent of Condition #111 was to be an hourly average based upon the PSD permit requirements.


You indicated that PG&E is additionally requesting that the Emergency Generator (S11) be allowed to start the engines during a PSPS event. Upon review, the District will allow the operation of S11 during a PSPS to be recognized as an emergency, similar in nature to how a Natural Gas Curtailment is seen as an emergency event that is not within the control of the HBGS.

When PG&E proposed the current HBGS operation as presently permitted, it was the District's understanding that the plant was designed and intended to initiate and maintain operation both during loss of natural gas and power from the state-wide grid; the permit conditions were acceptable to PG&E for specifically such scenarios for the HBGS. Based upon what has been presented so far in PG&E's initial permit application, AFC, and information to date, the District does not presently see Conditions #106, 110, 111, 113, or 113 as problematic when the HBGS needs to repower the area when isolated from the grid.

The District feels that the permit conditions, as approved by PG&E and the CEC, should be able to adequately allow the HGBS to conduct repowering testing efforts to uncover and address hidden issues prior to such emergencies for which the plant was designed, such as PSPS events and others.

Please call if you have any questions.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Al Steer', with a long horizontal flourish extending to the right.

Al Steer  
Compliance & Enforcement Manager  
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