

Directory: REEP-108 Data Requests

██████████ 02/04/14, 1:38 p.m.

The implementer states that Hydrogen is currently being vented and it is standard practice to vent Hydrogen. From prior experience staff consultants feel that the venting claim is unsupported. By law, refineries in California are not allowed to vent highly combustible gas such as Hydrogen in the air. Any excess Hydrogen produced is normally piped into the refinery gas, and excess volume, if any, may be burned under the emergency flare rules. That occurrence is extremely rare. Staff consultants, therefore, are unable to accept the implementer's claim that Hydrogen venting is standard practice. In our opinion, ISP is piping Hydrogen into the refinery pipeline or burning it to produce process heat. Since Hydrogen has some BTU value, it is inconceivable that a refinery that is buying natural gas from a utility would not use the purest form of Hydrogen produced by the methane reformer.

Please submit evidence in the form of permit to demonstrate that millions of therms of Hydrogen is being allowed to be vented. Also submit a low-rigor ISP study to support the claim of venting Hydrogen, not reusing it as fuel is standard practice. This is a show-stopper review and the ISP study is triggered by a project application. Therefore, this project and all similar projects will remain on hold until the ISP claim is substantiated. Staff consultants expected PG&E's own show-stopper assessment to have accompanied this application.