

TITLE V OPERATING PERMIT STATEMENT OF BASIS

Facility Name: Larkspur/Wildflower Energy

Title V Permit No.: APCD2007-PTO-978248

Permit Application Nos.: APCD2015-APP-004052 (Title V renewal)

Site ID: APCD2001-SITE-04109

Equipment Address: 9355 Otay Mesa Road
San Diego, CA 921545

Facility Contact: Bohdan Buchynsky
Contact Phone: (213) 473-0092

Permit Engineer: Arnold Peneda
Date Completed: 6/28/2016

1.0 Purpose/Introduction

This statement of basis describes a renewal Title V permit covering two stationary natural gas-fired combustion turbines permitted under District permits APCD2009-PTO-976138 and APCD2009-PTO-976094. The basis for submittal under Title V is that the facility is subject to the acid rain program under Title IV of the federal Clean Air Act (CAA) which requires Title V permitting pursuant to 40 CFR § 70.3.

2.0 Background

Since the last Title V renewal, two administrative amendments were made to the Title V to change the responsible official (RO). There have been no other changes to the Title V permit since the last renewal.

3.0 Facility Description

The facility comprises two identical simple cycle natural gas-fired turbine generators. Both turbine generators are General Electric Sprint Model LM6000PC, each with a rated generation capacity of 45 MW with a heat input rating of 395 MMBTU/hr. (LHV). Both are equipped with emissions controls and monitoring equipment, including water injection systems, selective catalytic reduction (SCR), data acquisition and handling systems (DAHS), and continuous emissions monitoring systems (CEMS). The emission units are summarized in the following table.

Permit Number	Source Category
APCD2009-PTO-976138	Turbine (1) – Electric Generation
APCD2009-PTO-976094	Turbine (2) – Electric Generation

4.0 Title IV (Acid Rain) and Title V Permitting

The facility is subject to the acid rain provisions under District Rule 1412 and Title IV of the Federal CAA, as given at 40 Code of Federal Regulation (CFR) § 72.6(a). Under the acid rain program, an *affected source* (a term specifically defined in Title IV of the CAA, and which applies to this facility) is subject to Title V permitting pursuant to District Rule 1401 and 40 CFR § 70.3(a)(4).

5.0 Applicable Requirements

5.1 Summary by Pollutant

Turbine (1)	
Pollutant	Primary Limiting Regulation(s)
NOx	Rule 20.3 (NSR); Rule 69.3.1; 40 CFR 60 Subpart GG
SO2	Rule 20.3; Rule 62; Rule 53; 40 CFR 60 Subpart GG
VOC	Rule 20.3;
CO	Rule 20.3; (AQIA only)
PM10	Rule 20.3; Rule 53
Toxic Pollutants	Rule 1200
Turbine (2)	
Pollutant	Primary Limiting Regulation(s)
NOx	Rule 20.3; Rule 62; Rule 53; 40 CFR 60 Subpart GG
SO2	Rule 20.3; Rule 62; Rule 53; 40 CFR 60 Subpart GG
VOC	Rule 20.3;
CO	Rule 20.3 (AQIA only)
PM10	Rule 20.3; Rule 53
Toxic Pollutants	Rule 1200

5.2 Discussion

The above table summarizes those rules on which the permit conditions are based. The permittee must comply with the most stringent requirement, as cited in the permit, which also serves as the compliance measure for the less stringent requirements.

District Rule 20.3

Rule 20.3 provides for new source review (NSR) with the introduction of any new or modified unit. This rule was considered at the time of the original A/C turbine (1) and for the combination of turbine (2). Rule 20.3 is also the basis for the aforementioned new

provisions for tuning, testing and maintenance. Rule 20.3 provisions were incorporated into the conditions to ensure the emissions from this facility remain below major stationary source thresholds.

40 CFR 60 Subpart KKKK

40 CFR 60 Subpart KKKK – *Standards of Performance for Stationary Combustion Turbines* (adopted by reference in District Regulation X) applies to stationary combustion turbines with a heat input at peak load 10 MMBtu/hr. (HHV of the fuel), which commenced construction, modification, or reconstruction after February 18, 2005. If applicable, this rule carries an explicit exemption from 40 CFR 60 Subpart GG.

Both turbines were installed prior to 2005 and have not had modifications since; therefore both turbines are not subject to 40 CFR 60 Subpart KKKK.

40 CFR 60 Subpart GG

Turbine 1 and Turbine 2 were determined to be subject to this new source performance standard *Standards of Performance for Stationary Gas Turbines* (adopted by reference in District Regulation X), which applies to stationary gas turbines that were constructed, modified or reconstructed after October 3, 1977. Both turbines are subject to this subpart and have permit conditions to include the applicable requirements.

6.0 Monitoring, Recordkeeping and Reporting

Pursuant to New Source Review (NSR) the turbines are required to operate and maintain the CEMS to measure NO_x, CO, and NH₃, which is also required by District Rules 69.3, 69.3.1, and 40 CFR 60 Subpart GG.

Monitoring and testing are required in the existing District permits, which are contained in Appendix A of the Title V permit. Additional recordkeeping and reporting are required pursuant to District Rule 1421.

Compliance Assurance Monitoring (CAM) under 40 CFR Part 64 was considered for this review. None of the emission units fulfill the criteria for applicability under Part 64. Additionally, the turbines are equipped with continuous emissions monitoring systems (CEMS), which excludes them from being subject to CAM under § 64.2 (b)(vi).

7.0 Outside Review

In accordance with District Rule 1415, the District is submitting the proposed draft permit for public notice and review by EPA Region 9 and affected states.

8.0 Conclusions / Recommendations

The source is expected to comply with all applicable requirements including those cited in the current District permit as well as those under District Rule 1401 and 40 CFR Part 70. Therefore, the recommendation of this report is for the subject renewal Title V permit to be issued following public notice, EPA review, and response to comments if necessary.