

San Diego County Air Pollution Control District
10124 Old Grove Road San Diego CA 92131-1649
(858) 586-2600 FAX (858) 586-2601

TITLE V APPLICATION
Stationary Source Summary (FORM 1401-A1)

Company Name San Diego Gas & Electric - Miramar Energy Facility	District Use Only NEDS # SITE ID # <u>1995-09138</u>
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I. FACILITY IDENTIFICATION

- Facility Name (if different than company name): Miramar Energy Facility (MEF)
- Four digit SIC Code: 4911
- Parent Company (if different than Company Name): N/A
- Mailing Address: 8315 Century Park Court, CP21L (Attn: Environmental Operations)
 City San Diego State CA Zip 92123
- Street Address or Source Location: 6875 Consolidated Way
 City San Diego State CA Zip 92121
- UTM Coordinates: 484558.5E, 3637348.7N
- Source Located within 50 miles of a state line: Yes No (All sources **are** within 50 miles)
- Source Located within 1000 feet of a school: Yes No
- Type of Organization: Corporation Sole Ownership Government
 Partnership Utility Company
- Legal Owner's Name: San Diego Gas & Electric Company
- Owner's Agent name (if any): _____
- Responsible Official: Daniel Baerman
- Plant Site Manager/Contact: Fred Waller Phone #: 760-432-2507 FAX #: 760-432-2510
- Application Contact: Hashim Navrozali
- Type of Facility: Electric Generation Plant
- General description of processes/products: Electric generation peaking plant served by simple-cycle, natural gas-fired turbines (GE LM6000 PC Sprint).
- Is a Federal Risk Management Plan (RMP) pursuant to Section 112(r) required? Yes No
 (If application is submitted after RMP due date, attach verification that plan is registered with the appropriate agency.)

II. TYPE OF PERMIT ACTION (check)	CURRENT PERMIT (permit number)	EXPIRATION (date)
<input type="checkbox"/> Initial Title V Application	N/A	N/A
<input checked="" type="checkbox"/> Permit Renewal	984123	7/22/2013
<input type="checkbox"/> Significant Permit Modification		
<input type="checkbox"/> Minor Permit Modification		
<input type="checkbox"/> Administrative Amendment		

III. DESCRIPTION OF PERMIT ACTION

- Does the permit action requested involve: Temporary Source Voluntary Emissions Caps
 Acid Rain Source Alternative Operating Scenarios Abatement Devices
 CEMs Permit Shield
 Outdated SIP Requirement Streamlining Multiple Applicable Requirement Streamlining
 Source Subject to MACT Requirements [Section 112]
 Source Subject to Enhanced Monitoring (40CFR64) [Compliance Assurance Monitoring]
- Is source operating under a Compliance Schedule? Yes No Proposed
- Is source operating under a Variance Yes No (If Yes, please attach variance information)
- For permit modification, provide a general description of the proposed permit modification:

IV. SUPPLEMENTAL ATTACHMENTS*: See attached table of contents

* Means all attachments to the complete application.

San Diego County Air Pollution Control District
10124 Old Grove Road San Diego CA 92131-1649
(858) 586-2600 FAX (858) 586-2601

TITLE V APPLICATION
Stationary Source Summary (FORM 1401-A2)

Company Name	District Use Only
<u>San Diego Gas & Electric - Miramar Energy Facility</u>	NEDS # SITE ID # <u>1995-09138</u>

I. MAJOR SOURCE APPLICABILITY

Check appropriate pollutant(s) for which you are a Major Source under Title V. Applicability is based on potential to emit. If more space is necessary, use additional forms. Please type or print legibly.

POLLUTANT	MAJOR SOURCE THRESHOLD TOTAL EMISSIONS, TPY	(check if appropriate)
VOC	100	<input type="checkbox"/>
PM10	100	<input type="checkbox"/>
SO2	100	<input type="checkbox"/>
NOx	100	<input type="checkbox"/>
CO	100	<input type="checkbox"/>
ODC	100	<input type="checkbox"/>
LEAD COMPOUNDS	10	<input type="checkbox"/>
HAZARDOUS AIR POLLUTANTS		
SINGLE HAP	10	<input type="checkbox"/>
N/A		<input type="checkbox"/>
		<input type="checkbox"/>
COMBINATION HAP	25	<input type="checkbox"/>
N/A		<input type="checkbox"/>
		<input type="checkbox"/>
GHG Emissions (CO2e)*	100,000	<input checked="" type="checkbox"/>

The GHG (CO2e) potential to emit was calculated based on 2011 GHG annual report submitted to CARB (see attached summary).

Attach all necessary calculations to this form as applicable. NOTE: Calculations are only needed if no Emission Inventory is on file with the District

Reference MEF Toxic/Criteria Inventory Report
GHG Annual Emissions Report to CARB

 Signature of Responsible Official
Daniel S. Baerman
 Print Name of Responsible Official
Director - Electric Generation
 Title of Responsible Official

Inventory Year 2010
 Inventory Year: 2011
7-12-12
 Date
(760) 432-2501
 Telephone No. of Responsible Official

II. EMISSIONS CALCULATIONS ATTACHED (as needed)*
 GHG potential to emit calculations attached.

Yes No

DISTRICT USE ONLY

Date Application Received: 7-20-12
 Application Filing Fee: 8958.00
 Receipt #: CK # 1163636

Application # 2012-App-002231
 District Received Stamp: _____
 Fee Code: TV



A  Sempra Energy™ company

HASHIM NAVROZALI
Principal Env't Specialist
8315 Century Park Court, CP21E
San Diego, CA 92123
Tel: 858-650-4087
Fax: 858-637-3700
Mobile: 619-980-7154
hnavrozali@SempraUtilities.com

July 20, 2012

Mr. Steven Moore
Senior Air Pollution Control Engineer
San Diego County Air Pollution Control District
10124 Old Grove Road
San Diego, CA 92131-1649

**SUBJECT: Title V Permit Renewal Application
San Diego Gas & Electric, Miramar Energy Facility**

Dear Mr. Moore:

San Diego Gas & Electric Company ("SDG&E") is hereby submitting a renewal application for the Part 70 (Title V) Operating Permit (No. 984123) for its Miramar Energy Facility (MEF) located at 6875 Consolidated Way in San Diego, California. The Title V permit expires on July 22, 2013. According to Section I.B.1 of the permit, a Title V renewal application must be submitted to the San Diego Air Pollution Control District ("District") no later than July 22, 2012. SDG&E is submitting the attached permit renewal application package to comply with this requirement.

We believe this application package constitutes both a timely and complete submittal to fulfill Part 70 and Regulation XIV permit renewal application requirements. The forms and attachments included for your review are provided in accordance with guidance from the District and include the Responsible Certification. The forms included are as follows:

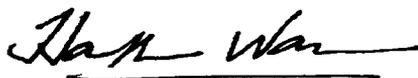
- 1401-A1 & A2 Stationary Source Summary
- 1401-G Insignificant Activity List
- 1401-H1 Applicable Requirements Summary Check List
- 1401-H2 List of Permits by Equipment Category
- 1401-I Certification Statement
- 1401-M Abatement Devices
- 1401-O Multiple Applicable Requirements Streamlining (MARS)
 - 1401-O Details on Attachment O-1 (Table 1)
- 1401-Q Request for Permit Shield

Pursuant to your advice, we have also included greenhouse gas (GHG) potential to emit calculations from the plant to address applicability of MEF to EPA's PSD and Title V GHG Tailoring Rule.

In addition, a check in the amount of \$8,958 is also being submitted (pursuant to the Title V permit renewal application fee estimate provided by the District).

If you have any questions regarding this application please contact me at (858) 650-4087 (email: hnavrozali@semprautilities.com).

Sincerely,



Hashim Navrozali
Principal Environmental Specialist

Enclosures

cc: Daniel Baerman (SDG&E)
Charles Hardman (SDG&E)
Jason Dobbs (SDG&E)
Fred Waller (SDG&E)

**SAN DIEGO COUNTY AIR POLLUTION CONTROL DISTRICT
APPLICATION FEE ESTIMATE**

Applicant: San Diego Gas & Electric

Fee Schedule: TIV

Engineer: Steven Moore

Estimate Date: 07/13/2011

Application: Title V Renewal for Miramar Energy

ACTIVITY	FEE CODE	LABOR CODE	CLASSIFICATION	LABOR HOURS	LABOR RATE	COST	SUBTOTAL	
A/C		EG3	Associate Engineer		\$145			
		EG4	Senior Engineer		\$169			
P/O		EG3	Associate Engineer		\$145			
		EG4	Senior Engineer		\$169			
Title V	NSR	EG4	Senior Engineer	50	\$177	\$8,850		\$8,850
AQIA	NSR	EG3	Associate Engineer		\$145			
	AQA	MET3	Associate Meteorologist		\$98			
Health Risk Assessment	TNS	ES3	Associate Specialist		\$125			
		EG3	Associate Engineer		\$145			
		EG4	Senior Engineer		\$172			
Testing or Test Witness	96A	EG3	Associate Engineer		\$145			
		CH3	Associate Chemist		\$98			
		CH4	Senior Chemist		\$114			
Other Fees	RNP		Renewal Fee				\$95	
	NBF		Administrative Fee		\$95			
	EMF		Emissions Fee					
	ITA		Database Replacement (app)		\$13			
	ITP		Database Replacement (rnp)					
	ITE		Database Replacement (emf)			\$13		
Deficit		EG3	Associate Engineer					
		CH3	Associate Chemist					

- Notes: 1. If actual costs are less than estimated, the difference shall be refunded. If actual costs are greater than estimated, additional fees shall be required. If tests are required, additional fees shall be required but may be deferred until the A/C is issued. Additional emissions fees may also be required. Work records are kept, which may result in a final fee more or less than this estimate.
2. A 2.2% surcharge will be assessed to all credit card payments (American Express and Discover only).
3. This fee estimate is valid until June 30, 2013.
4. Please submit a copy of this fee estimate with your application.

ESTIMATE TOTAL: \$8,958

San Diego Gas & Electric

Miramar Energy Facility

6875 Consolidated Way

San Diego, CA 92121

**Title V Operating Permit No. 984123
Renewal Application Submittal**

Date: July 20, 2012

Application Contents

- Project Summary/Description
- Area Maps

San Diego County Air Pollution Control District Forms

- 1401-A1 & A2 Stationary Source Summary
- 1401-G Insignificant Activity List
- 1401-H1 Applicable Requirements Summary Check List
- 1401-H2 List of Permits by Equipment Category
- 1401-I Certification Statement
- 1401-M Abatement Devices
- 1401-O Multiple Applicable Requirements Streamlining (MARS)
- 1401-Q Request for Permit Shield

Attachments

- Greenhouse Gas (GHG) Potential to Emit Calculations
- Attachment O-1 (MARS)
- Excerpt from CPUC Rule 30 Regarding Natural Gas Quality Standards
- PTO No. APCD2009-PTO-981360 for Turbine #1
- PTO No. APCD2010-PTO-000397 for Turbine #2
- PTO No. APCD2009-PTO-000395 for emergency black-start engine

Project Summary/Description

Miramar Energy Facility
Renewal Application for Title V Operating Permit No. 984123
Project Summary

The Miramar Energy Facility (MEF) is an electrical generation plant designed to meet local and regional electric power requirements and to support the local electric grid. This peaker power plant was constructed to supplement the operations of Reliability Must Run (RMR) facilities in the San Diego region, to alleviate electrical capacity shortages in the region, and to enhance the reliability of service to the City of San Diego.

The plant is currently owned and operated by San Diego Gas & Electric ("SDG&E") and is located at 6875 Consolidated Way in the City of San Diego, CA.

The plant currently consists of two 49.9 MW simple-cycle, natural-gas fired combustion turbines (Model: GE LM6000PC) and a 924 HP natural gas fired black-start emergency engine. The emissions from the turbines are controlled by a high-temperature selective catalytic reduction system (with water and ammonia injections) and oxidation catalyst. The plant is also equipped with a GE Energy Services Data Acquisition and Handling System (DAHS) and a Continuous Emission Monitoring System (CEMS) that monitors emissions of NO_x, CO, and Oxygen. The combined operation of the turbines is limited to a maximum of 5,000 hours per calendar year.

The San Diego Air Pollution Control District (District) issued an Authority to Construct for Turbine #1 (No. 981360) at MEF in September 2004 with a maximum operation limit of 5000 hours per calendar year. Turbine #1 started initial operation in May 2005. Although the MEF was not a major source of criteria pollutants, its designation as a Title IV (Acid Rain) emissions source made it subject to a Part 70 (Title V) Facility Operating Permit. As such, SDG&E submitted a Title V application to the District on April 17, 2006. The District subsequently issued a Title V permit (No. 984123) on July 22, 2008.

On May 25, 2007, an application was submitted to the District for addition of a new 49.9 MW simple-cycle turbine (i.e. Turbine #2) and 925 HP black-start emergency engine (Waukesha, Model L36GLD) to the plant. Turbine #2 is identical to Turbine #1 (i.e. GE LM6000PC) and the maximum annual operating hour limit (for both turbines combined) was maintained at 5,000 hours.

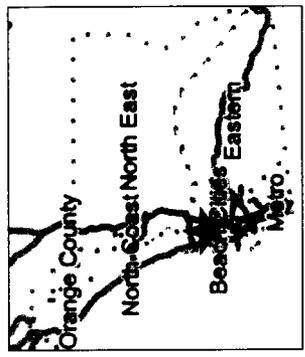
The District adopted a Mitigated Negative Declaration (pursuant to CEQA) and issued Authorities to Construct (ATCs) for Turbine #2 (No. 985423) and black-start emergency engine (No. 985424) in November 2008. The new equipment was installed and commenced operation in July 2009. The final PTOs for Turbine #2 and the black-start emergency engines were issued by the District in May 2011.

SDG&E submitted a Title V permit modification application to incorporate Turbine #2 and the black-start emergency engine into the Title V Facility Operating Permit (No. 984123) for the plant on February 2, 2009. The application was assigned an Application No. of 987530. The District, however, has not yet issued the updated Title V permit to reflect the addition of Turbine #2 and the black-start engine.

The Title V permit expires on July 22, 2013. According to Section I.B.1, of the permit, a Title V renewal application is required to be submitted to the District no later than July 22, 2012. SDG&E is hereby submitting the attached Title V renewal application for MEF to comply with this requirement.

Project Area Maps

Miramar Energy Facility



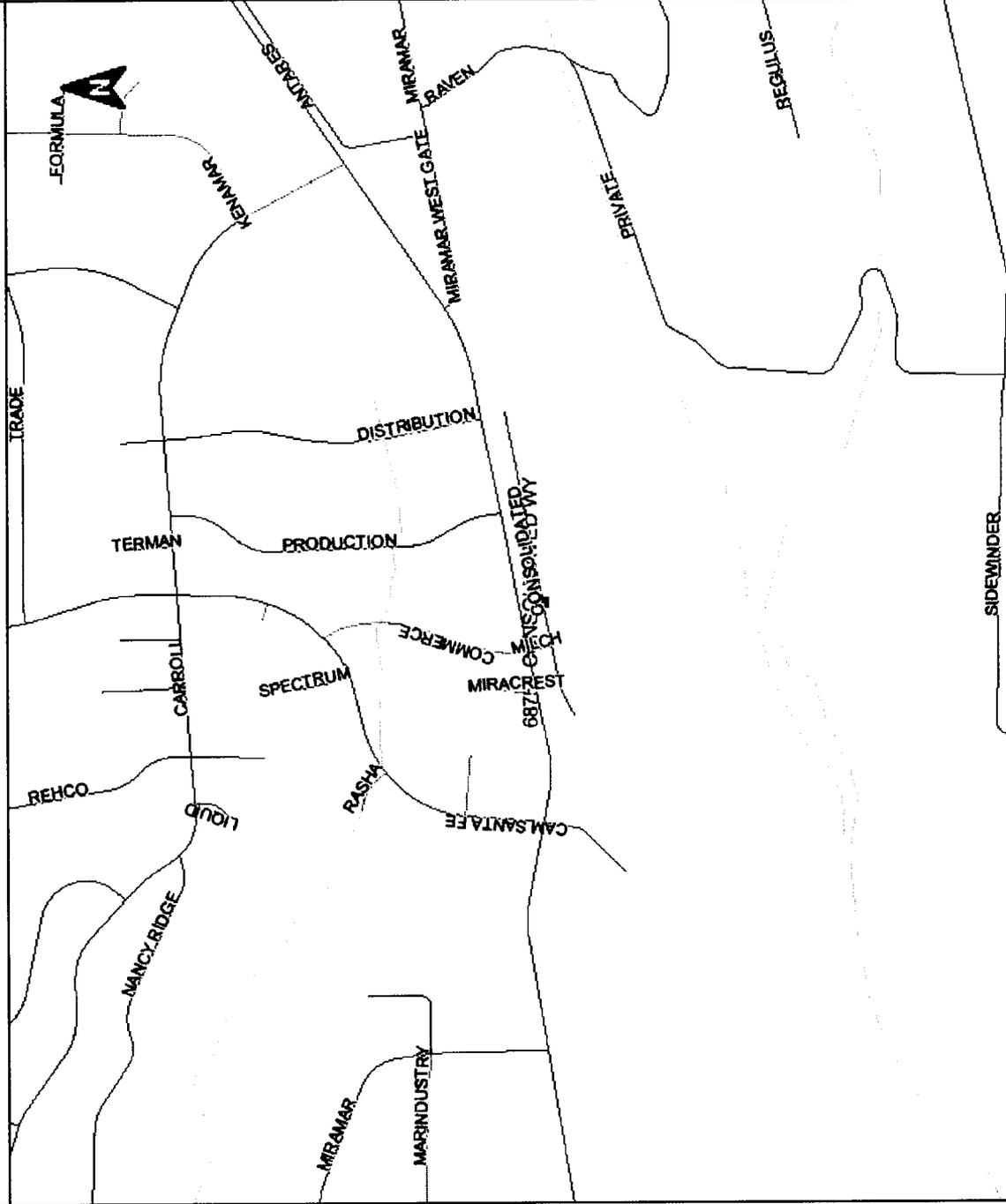
Legend

- Freeway
- Highway
- Major Roads
- Minor Road
- Orange County Roads
- Railroad
- Gas Transmission
- District Boundary
- SDG&E Fee Property
- Lease
- NONE
- Owned
- Sold
- Lakes

Scale: 1:19,930

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Miramar Energy Facility



Legend

- New Streets and Widening**
 - Planning
 - Design
 - Bid and Award
 - Construction
 - Operational
- Partway Enhancements and Medians**
 - Planning
 - Design
 - Bid and Award
 - Construction
 - Operational
 - Slurry Seal
- Planning**
 - Design
 - Bid and Award
 - Construction
 - Operational
- Overlay**
 - Planning
 - Design
 - Bid and Award
 - Construction
 - Operational
- Quadrants and Miscellaneous Bridgework**
 - Planning
 - Design
 - Bid and Award
 - Construction
 - Operational
- Bridges Rehabilitation**
 - Planning
 - Design
 - Bid and Award
 - Construction
 - Operational
- Bridges New / Replacements**
 - Planning
 - Design
 - Bid and Award
 - Construction
 - Operational
- Freeways**
 - Freeway Ramps
 - Minor Roads
 - Bay
 - Streams
 - Major
 - Minor

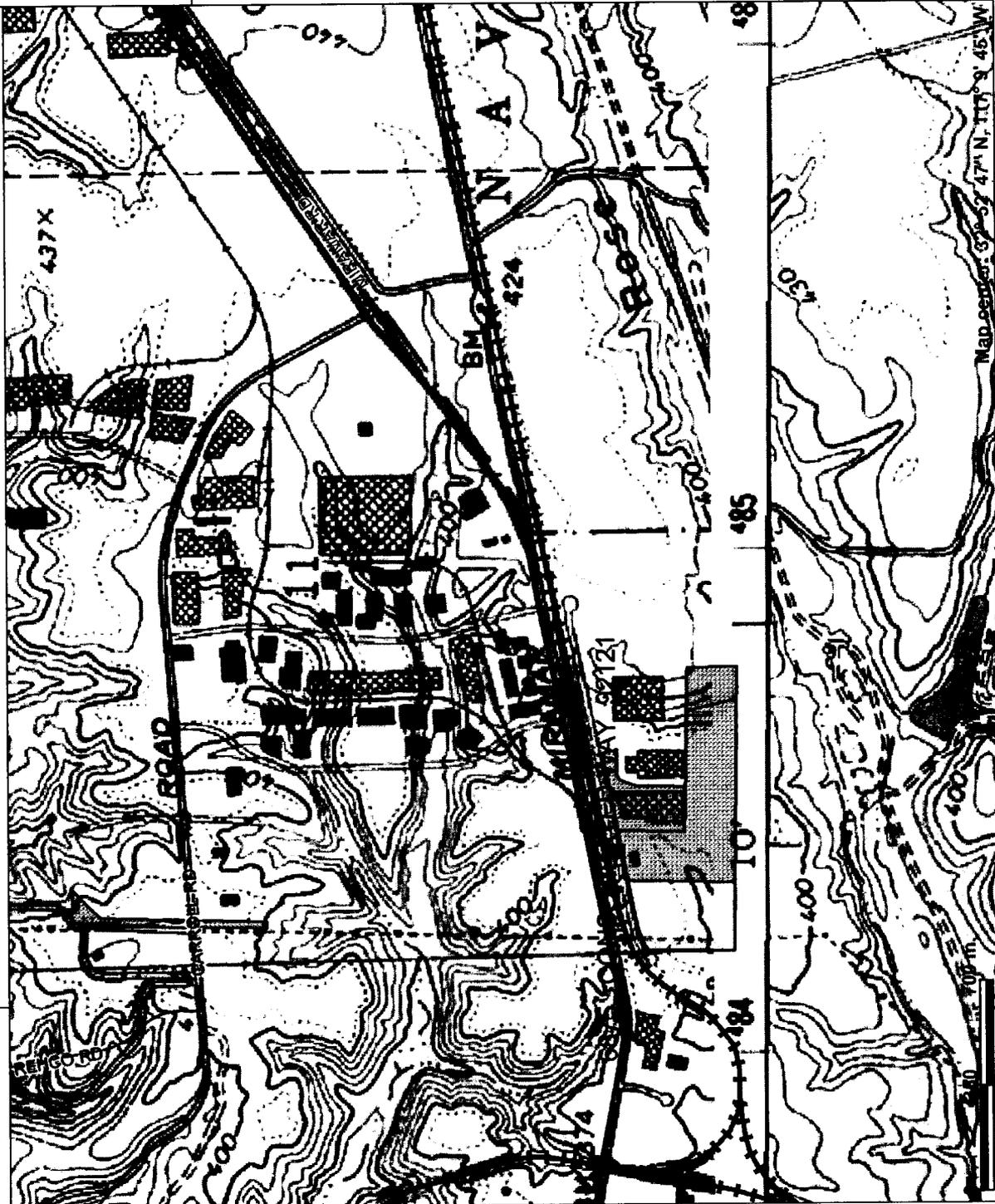
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DO NOT USE FOR NAVIGATION

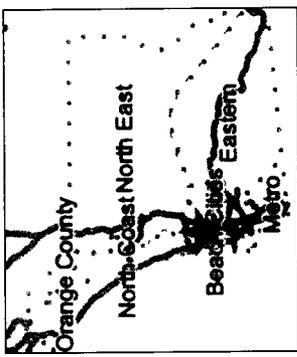


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Miramar Energy Facility



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- ### Legend
- Freeway
 - Highway
 - Major Road
 - Minor Road
 - Orange County Roads
 - Railroad
 - Gas Transmission
 - District Boundary
 - SDG&E Fee Property
 - Lease
 - NONE
 - Owned
 - Sold
 - Lakes

Scale: 1:19,973

Form 1401-A1 & A2

Stationary Source Summary