

SAN DIEGO AIR POLLUTION CONTROL DISTRICT

**SUPPLEMENTAL APPLICATION
TITLE V MINOR PERMIT
MODIFICATION (Form 1410-B)**

San Diego APCD Use Only
 Appl. No.: 2013-002695
 ID No.: 1995-09138

Minor Permit Modification

Completion of this form meets the requirements of Rule 1414(f)

I. BACKGROUND INFORMATION

Title V Permit to Operate No. 984123 Affected existing District Permit No. APCD2010-PTO-000397 & APCD2009-PTO981360

Provide a general description of the proposed permit modification:

The enclosed application is submitted to incorporate tuning and testing conditions for the combustion turbine in accordance with manufacturer specifications and requirements per the Western Electricity Coordinating Council (WECC) for Miramar Energy Facility I and II (MEF I and MEF II). This modification application also includes a request to replace the gas turbine oxidization catalyst with a functionally identical, newer, more efficient catalyst at the MEF II.

II. APPLICABLE REQUIREMENTS

List all Rules and Regulations that apply to the Title V permit modification.

Rule	Adoption Date	Rule Description	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section
		Please refer to the enclosed application.		

III. MONITORING, RECORDKEEPING & REPORTING (MR&R) REQUIREMENTS AND TEST METHODS

- The MR&R requirements and Test Methods contained in the Authority to Construct and/or the rules identified in Section II above, will be used to determine compliance with the applicable requirements.
- Additional or modified MR&R and/or Test Methods are proposed. See attachment number _____.

IV. MINOR MODIFICATION OPTIONS (Check the applicable option)

- Request the procedures specified in 1410(j) be used to modify the Title V Operating Permit.
- Request the proposed permit action be publicly noticed in accordance with the requirements of 1415(a).
- The proposed modifications will be implemented prior to final permit action being taken by the District.

Please provide the following:

- Draft Title V permit conditions for the emission unit affected by this application.
- A summary of the proposed emission changes, including calculations.

V. OTHER REQUIREMENTS, IF APPLICABLE

- This modification is subject to a Schedule of Compliance. See attachment number _____.
- This modification is subject to the requirements of CAM. See attachment number _____.

VI. COMPLIANCE STATEMENT

Read each statement listed below carefully and check each applicable statement.

- Modified Source-

1.0 Overview and Background

San Diego Gas & Electric (SDG&E) is submitting this Minor Permit Modification application package to the San Diego County Air Pollution Control District (SDAPCD) to incorporate tuning and testing conditions for the combustion turbine in accordance with manufacturer specifications and requirements per the Western Electricity Coordinating Council (WECC) for Miramar Energy Facility I and II (MEF I and MEF II) (Permit ID's APCD2009-PTO-981360 and APCD2010-PTO0000397). This modification application also includes a request to replace the gas turbine oxidization catalyst with a functionally identical, newer, more efficient catalyst at the MEF II. This application has been prepared to provide adequate documentation and notification for the anticipated date of installation and operation of the replacement equipment, scheduled for March, 2013.

The SDAPCD site identification number is APCD1995-SITE-09138. Both facilities are part of the same stationary source and are subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 Volume 40 of the Code of Federal Regulations (CFR), and SDAPCD Rule 1401. This stationary source is subject to Title V because it is subject to other federal regulations even though it does not have the potential to emit more than 50/100 tons per year (TPY) of a regulated air pollutant. In February 2009 SDG&E submitted a Title V modification application to incorporate MEF II into the permit and make other changes; however SDAPCD has not issued the revised Title V permit to incorporate MEF II into the existing Title V permit. This application requests changes to certain permit conditions but does not propose changes to the annual permit limits.

The completed SDAPCD application forms APCD 116 and 1410-B are included in Appendix A.

1.1 Facility Background

MEF I and MEF II are comprised of a natural gas-fired, simple-cycle combustion turbine (SCCT) plant, each with a nominal electrical power output of 49.9-megawatts (MW), located in the city of San Diego, California. The power generating facilities each include one General Electric SCCT equipped with a high temperature selective catalytic reduction (SCR) system and ammonia injection system for emissions control.

1.2 Facility Contact Information

This Minor Permit Modification application package includes a change in the Responsible Official from Daniel Baerman to Carl LaPeter, as presented below.

The facility contact information is as follows:

Name / Address: San Diego Gas & Electric
8315 Century Park CT CP 21L
San Diego CA 92123

Based on information and belief formed after reasonable inquiry, the equipment identified above is operating in compliance with the applicable requirements identified in Section II above.

- Modified Source-
Based on information and belief formed after reasonable inquiry, the equipment identified above will operate in compliance with the proposed Title V permit conditions specified in Section VI above, until final permit action is taken by the District.
- New Source-
Based on information and belief formed after reasonable inquiry, the equipment identified above will operate in compliance with the applicable requirements identified in Section II above.
- Based on information and belief formed after reasonable inquiry, the equipment identified in Section I above, will comply with future-effective applicable requirement(s) on a timely basis.
- Based on information and belief formed after reasonable inquiry, the equipment identified in Section I above, will comply with all applicable requirements in accordance with the attached schedule of compliance and Rule 1414(f)(3)(viii).

VII. SIGNATURE AND CERTIFICATION

- Based on information and belief formed after reasonable inquiry, the proposed modification meets the criteria of a minor permit modification.
- Based on information and belief formed after reasonable inquiry, I certify that all information submitted with this application, including all attachments, is true, accurate, and complete.

Signature of Responsible Official

Carl LaPeter
Print Name of Responsible Official

Date

Plant Manager
Title of Responsible Official

(760) 432-2503
Telephone No

Responsible Official: Carl LaPeter
Plant Manager
San Diego Gas & Electric.
760-432-2503
clapeter@semprautilities.com

1.3 Project Contact Information

The project contact information is as follows:

Facility Contact: Jason Bowman
SDG&E Environmental Services
JBowman2@semprautilities.com
(760) 432-2547 (phone)

Permitting Contact: Hashim Navrozali
Principle Environmental Specialist
HNavrozali@semprautilities.com
(858) 650-4087 (phone)
(858) 637-3700 (fax)

Permitting Consultant Contact: AECOM
Sara Head
(805) 233-3995 (phone)
(805) 388-3577 (fax)
sara.head@aecom.com

SAN DIEGO COUNTY AIR POLLUTION CONTROL DISTRICT

APPLICATION FEE ESTIMATE

Applicant DBA: SDG&E

Fee Schedule: 20F

APCD Engineer: Nick Horres

Estimate Date: 2/19/2013

Application: To add additional tuning and testing hours to 2 existing gas turbines
Assume AQIA required, no HRA. Additional application and fees required
for any title V modifications

ACTIVITY	LABOR CODE	CLASSIFICATION	LABOR HOURS	LABOR RATE	COST	SUBTOTAL
A/C	EG3	Associate Engineer		\$150		
	EG4	Senior Engineer		\$177		
P/O	EG3	Associate Engineer	14	\$150	\$2,100	\$2,277
	EG4	Senior Engineer	1	\$177	\$177	

NSR	EG3	Associate Engineer		\$150		
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HRA AQIA	EG3	Associate Engineer		\$150		\$808
	MET3	Associate Meteorologist	8	\$101	\$808	

*A C E fee				\$116		\$95
Non-refundable App fee			1	\$95	\$95	
VOC Source Test						
Renewal Fee				\$195		

Deficit	EG3	Associate Engineer		\$150		
	CH3	Associate Chemist		\$99		
	ST1	Source Test Technician		\$76		
		Non-refundable Base Fee		\$95		

- Notes:**
- If actual costs are less than estimated, the difference shall be refunded. If actual costs are greater than estimate additional fees shall be required. If tests are required, additional fees shall be required which may be deferred 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.
 - A 2.2% surcharge will be assessed to all credit card payments (American Express and Discover only)
 - Please submit a copy of this fee estimate with your application
- Work records are kept, which may result in a final fee more or less than this estimate.

ESTIMATE TOTAL: \$3,180

#442

SAN DIEGO COUNTY AIR POLLUTION CONTROL DISTRICT

APPLICATION FEE ESTIMATE

Doc # 291943
Submitted 3/19/13

Applicant DBA: SDG&E Fee Schedule: _____

APCD Engineer: Doug Erwin Estimate Date: 3/5/2013

Application: Title V modification to change conditions and replace catalyst

ACTIVITY	LABOR CODE	CLASSIFICATION	LABOR HOURS	LABOR RATE	COST	SUBTOTAL
TV	EG3	Associate Engineer		\$150		
	EG4	Senior Engineer	15	\$177	\$2,655	
	EG2	Assistant Engineer		\$131		
P/O	EG3	Associate Engineer		\$150		
	EG4	Senior Engineer		\$177		
		(fixed fee)			\$2,655	\$2,655

NSR	EG3	Associate Engineer		\$150		
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HRA	EG3	Associate Engineer		\$150		
	MET3	Associate Meteorologist		\$101		

*A C E fee				\$116		
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IT Fees	ITA			\$13		
	ITP			\$13		
	ITE			\$3		

Deficit	EG3	Associate Engineer		\$150		
	CH3	Associate Chemist		\$99		
	ST1	Source Test Technician		\$76		
		Non-refundable Base Fee	1	\$95	\$95	

Renewal Fee						
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Notes: _____

* ACE fee is the Air Contaminant Emissions Fee

Work records are kept, which may result in a final fee more or less than this estimate.

ESTIMATE TOTAL: **\$2,750**