

STATEMENT OF BASIS
Title V Permit Renewal

Facility Name: Chula Vista Energy Center
Application Number: APCD2020-APP-006444
Title V Permit Number: APCD2007-TVP-978119
Facility ID: APCD2000-SITE-03752
Equipment Address: 3497 Main Street, Chula Vista, CA 91911
Facility Contact: Stephen J. Cobbe
Contact Phone: (619) 579-9002 scobbe@wellhead.com
Permit Engineer: Melissa Adams
Date: 8-11-2021

Senior Engineer: Nick Horres

Purpose of Statement of Basis – Title V Permit Renewal plus other changes below:

1. Type of action and summary of changes

The applicant requests issuance of a renewal Title V permit for Chula Vista Energy Center (Title V permit APCD2007-TVP-978119). The facility is subject to Title V permitting because it is subject to the Acid Rain program under Title IV of the federal Clean Air Act (CAA).

Since the last renewal Title V permit was issued, no additional Title V applications have been submitted to be incorporated into the Title V permit renewal.

2. History of Title V Applications and District Modification Applications Since Previous Renewal.

The renewal application was received on September 4th, 2020. The Title V permit expires on October 10, 2021. This renewal application was submitted at least 12 months but not more than 18 months prior to permit expiration, in accordance with Rule 1410. The application therefore is timely.

Application History for District Modifications				
Application Number	Application Summary	Description	Affected Emission Units	Outcome
No new District applications are associated with this Title V renewal.				

The following table lists applications at this facility to modify the Title V permit.

Title V Application History			
<u>Application Number</u>	<u>Application Description</u>	<u>Equipment</u>	<u>Approved?</u>
APCD2015-APP-004073	Past Title V Renewal	Turbine set	Yes
APCD2020-APP-006444	Title V Current Renewal	Turbine set	Current Renewal

3. Facility Description

The facility has only one permit, as listed in the table below:

Permit Number	Equipment Description
APCD2008-PTO-976039	Gas Turbine (twin pack): Pratt & Whitney, Model FT4/GG4, 44 MW, 688 MMBtu/hr heat input, natural gas fired, simple cycle; with dry low-NOx combustors; a selective catalytic reduction (SCR) system including an automatic ammonia injection control system; a continuous emissions monitoring system (CEMS); and a data acquisition and handling system.

4. Title V Applicability & Acid Rain

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 Subpart C, Part 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 Subpart C, Part 70.3(a)(4).

Since the facility is subject to Title IV, the facility is also subject to the Title V operating permit program.

5. Potential to Emit and Actual Emissions

The following table shows the actual and potential emissions for the facility. For all pollutants, emissions are well below major source thresholds. The facility is an area source for HAPS (hazardous air pollutants).

Potential to Emit Tons per Year				
Pollutant	Thresholds	*Facility Actual Emissions	**Potential to Emit	Major Source
Highest Federal HAP	10	< 10	-	No
Sum of Federal HAPs	25	<25	-	No
NOx	100	0.456	22.97	No
VOC	100	0.071	3.18	No
PM10	100	0.052	8.17	No
SOx	100	0.019	2.61	No
CO	100	5.154	97.92	No

*The actual emissions are from the District’s Emission Inventory for 2019.

**The potential emissions are from the District engineering evaluation for APCD2021-APP-006573 (APP-006573 is still in District testing and will not be part of this renewal).

6. 40 CFR Part 64 CAM (Compliance Assurance Monitoring)

Pursuant to section 64.2(b)(i), the equipment is not subject to CAM since no individual piece of equipment is a major source in itself.

The turbine permit requirements already specify the use of a certified CEMs (Continuous Emission Monitoring systems) which ensures they are not subject to CAM requirements.

7. Applicable Requirements

General Permit Program Applicable Requirements

Regulation	Rule	Title
SDCAPCD Reg. II	10	Authority to Construct Required
SDCAPCD Reg. II	19	Provision of Sampling & Testing Facilities
SDCAPCD Reg. II	19.3	Emission Information
SDCAPCD Reg. II	20 20.1,20.2,20.3	New Source Review (NSR)
SDCAPCD Reg. II	21	Permit Conditions
SDCAPCD Reg. II	24	Temporary Permit to Operate
SDCAPCD Reg. II	25	Appeals
SDCAPCD Reg. IV	60	Circumvention
SDCAPCD Reg. IV	71	Abrasive Blasting
SDCAPCD Reg. V	98	Breakdown Conditions: Emergency Variance
SDCAPCD Reg. VI	101	Burning Control
SDCAPCD Reg. VIII	131	Stationary Source Curtailment Plan
40 CFR Part 68	Part 68	Risk Management Plan (Ammonia Storage)
40 CFR Part 82	Subpart B	Servicing of Motor Vehicle Air Conditioners
40 CFR Part 82	Subpart F	Recycling and Emission Reducing
40 CFR Part 89	Part 89	VOC Standards for Consumer Products

Facility-wide/Other Prohibitory and Miscellaneous Requirements

Regulation	Rule Citation	Regulation
SDCAPCD Reg. II	19.2	Continuous Emission Monitoring Systems
SDCAPCD Reg. IV	50	Visible Emissions
SDCAPCD Reg. IV	51	Nuisance
SDCAPCD Reg. IV	52	Particulate Matter
SDCAPCD Reg. IV	53	Specific Contaminants
SDCAPCD Reg. IV	62	Sulfur Content of Fuels
SDCAPCD Reg. IV	67.0.1	Architectural Coatings
SDCAPCD Reg. IV	67.17	Storage of Organic Materials Containing VOC
SDCAPCD Reg. XII	1200	Toxic Air Contaminants – New Source Review
SDCAPCD Reg. XII	1206*	Asbestos Removal, Renovation, and Demolition
40 CFR Part 60	Subpart A	NSPS General Provisions
40 CFR Part 63	Subpart A	NESHAP General Provisions
40 CFR Part 61	Subpart M*	NESHAP - Asbestos
40 CFR Part 73	Part 73	Sulfur Dioxide Allowance System
40 CFR Part 74	Part 74	Acid Rain

* The District issued its own Asbestos Rule 1206 intended to be as stringent as Subpart M. The facility is subject to the most stringent requirements of either rule, which at the time of this report is ensured by compliance with Rule 1206.

Permit Specific Applicable Requirements:

SDAPCD Permit No.	Permit Description	Applicable Rules
APCD2008-PTO-976039	One natural gas twin-pack (two simple cycle combustion turbines with common generator and exhaust).	SDAPCD Reg. IV, Rules 50, 51,52, 53, 62, 63, 69.3.1., 40 CFR 60-Subpart GG

Primary Limiting Regulations: Turbine set

Combustion Turbine Set	
Pollutant	Primary Limiting Regulations
NOx	Rule 20.2 (NSR); 40 CFR 60 Subpart GG
SO2	Rule 20.2; Rule 62; Rule 53; 40 CFR 60 Subpart GG
VOC	Rule 20.2
CO	Rule 20.2 (AQIA only)
PM10	Rule 20.2; Rule 53 (PM)
Toxic Pollutants	Rule 1200

8. Updates to the Title V Permit Incorporated into this Action

This action, a renewal of the Title V permit, did not result in any changes in emissions, but rules tables in the Title V permit were revised for clarity and accuracy.

9. Multiple Applicable Requirement Streamlining

The facility does not request Multiple Applicable Requirements Streamlining.

10. Permit Shield

The facility does not request any additional Permit Shields.

11. Permit Process-Public Notification and Notice to EPA and Affected States

Before issuing the final permit, The District will provide the opportunity for review by EPA, affected states and bands of Indians through a public notice period and an EPA review period. Notice will be

provided to the EPA electronically through the EPS and will be sent electronically to affected states and bands of Indians. The public notice and associated documents will be provided on the District website, and the public notice will be published in a newspaper.

12.Recommendations

The facility 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 proposed renewal Title V permit to be issued following public notice, EPA review and response to any comments.

13.Attachments

The following are attached:

- Application Package
- Draft Title V Permit
- Public Notice