

Brian Yim Principal Environmental Specialist 8315 Century Park Court, CP21E San Diego, CA 92123 Tel: 619-676-8635 bylm@sdge.com

September 18, 2020

Mr. Nick Horres 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, Cuyamaca Peak Energy Plant

Dear Mr. Horres:

San Diego Gas & Electric Company ("SDG&E") is hereby submitting a renewal application for the Part 70 (Title V) Operating Permit (No. 979681) for its Cuyamaca Peak Energy Plant (CPEP) located at 200 N. Johnson Avenue, San Diego, California. The Title V permit expires on October 26, 2021. 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 October 25, 2020. 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 includes the Responsible Official's 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)
		o 1401-O Details on Attachment O-1 (Table 1)
	1401-Q	Request for Permit Shield

Mr. Nick Horres San Diego APCD September 2020

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

A check in the amount of \$8,354 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 (619) 676-8635 or email: byim@sdge.com.

Sincerely, Brian Yim Principal Environmental Specialist

Enclosures

cc: Carl LaPeter (SDG&E) Charles Hardman (SDG&E) Jason Dobbs (SDG&E) Casey Williams (SDG&E) Moses Peram (SDG&E) Hashim Navrozali (SDG&E)

San Diego Gas & Electric

Cuyamaca Peak Energy Plant

200 N. Johnson Ave San Diego, CA 92020

Title V Operating Permit No. 979681 Renewal Application Submittal

Date: September 18, 2020

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

Project Summary/Description

Cuyamaca Peak Energy Plant

Renewal Application for Title V Operating Permit No. 979681 Project Summary

The Cuyamaca Peak Energy Plant (CPEP) 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 200 N. Johnson Avenue in the City of San Diego, CA.

The plant currently consists of one 49.5 MW Pratt & Whitney, Model FT-8 (DLN), Swift-Pac (two simple cycle gas turbines with common generator and exhaust), 500 MMBTU/Hr total heat input, natural gas fired, with exhaust air cooling; a Peerless Manufacturing Company selective catalytic reduction (SCR) system with a Haldor catalyst; an Engelhard oxidation catalyst system; a continuous emission monitoring system (CEMS), and continuous parametric monitors. Additionally, the plant has a 1114 BHP Caterpillar Model G3512 natural gas-fired emergency generator.

The San Diego Air Pollution Control District (District) issued an Authority to Construct for Gas Turbine (No. 976021) at CPEP (previously owned and operated by CalPeak Power-El Cajon, LLC). The Gas Turbine started initial operation in December 2, 2001. Although CPEP 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 January 3, 2012. The District subsequently issued a Title V permit (No. 979681) on June 14, 2011.

The Title V permit expires on October 26, 2021. 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 October 25, 2020. SDG&E is hereby submitting the attached Title V renewal application for CPEP to comply with this requirement.

TITLE V OPERATING PERMIT STATEMENT OF BASIS

Facility Name:	San Diego Gas & Electric (SDGE) Cuyamaca Peak Energy Plant (CPEP)
Title V Permit No.:	APCD2006-PTO-979681
Permit to Operate Nos.:	APCD2006-PTO-979681 APCD2008-PTO-976021 APCD2017-APP-005183
Site ID:	APCD2001-SITE-04087
Equipment Address:	200 N. Johnson Avenue San Diego, CA 92020
Facility Contact: Contact Phone:	Carl LaPeter (760) 432-2503
Permit Engineer: Date Completed:	Nick Horres 10/26/16

1.0 Purpose/Introduction

This statement of basis describes a renewal Title V application and permit covering one stationary natural gas-fired combustion turbine and one stationary natural gas-fired emergency backup generator. 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

On October 26, 2016, CPEP received a signed renewal of Title V permit APCD2008-PTO-979681. This report addresses the renewal, as prescribed in Section I(B)(1), "the permittee shall submit a complete application for renewal of this permit to the Air Pollution Control Officer no later than October 25, 2020 and no earlier than January 25, 2020", which comprises of few changes, and summarizes the recent revision to add approved periods of testing, tuning, and maintenance.

3.0 Facility Description

The facility comprises one simple cycle natural gas-fired turbine generator and a natural gas-fired emergency backup generator. The turbine generator is a Pratt and Whitney, with rated generation capacities of 49.5 MW, as described in the subject permit. It is equipped with emissions controls and monitoring equipment, including selective catalytic reduction (SCR), data acquisition and handling systems (DAHS), and continuous emissions monitoring systems (CEMS). The emission units are summarized in the first of the following tables. The second table summarizes total facility emissions based on the District's emission inventory.

Permit Number	Source Category
APCD2008-PTO-976021	Turbine – Electric Generation
APCD2017-APP-005183	Natural Gas-Fired Emergency Backup Generator

Emissions Summary (as reported for 2019)		
Criteria Pollutants Annual (tons)		
NOx	0.533	
VOC	0.069	
Total PM	0.027	
SO2	0.026	
CO 2.321		

4.0 <u>Title IV (Acid Rain) and Title V Permitting</u>

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 <u>Summary by Pollutant</u>

Turbine (1)		
Pollutant	Primary Limiting Regulation(s)	
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	

СО	Rule 20.2 (AQIA only)
PM10	Rule 20.2; Rule 53
Toxic Pollutants	Rule 1200

5.2 Discussion

The above table summarizes those rules on which the permit conditions are based. It should be noted that "streamlining" of the applicable regulations has been requested and applied for this and prior evaluations for District permits. This simply means that, where multiple requirements apply, the most stringent requirement has been identified through a sequential analysis of the emission standards and means of compliance (e.g., monitoring, recordkeeping and reporting), and then cited singularly in the permit as a streamlined alternative to citing all of the requirements. 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 20.2

Rule 20.2 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 Authority to Construct (A/C) for turbine. Best available control technology (BACT) limits were established based on this rule for the emission unit (District permit).

District Rule 1200

Rule 1200 provides for NSR pertaining to toxic pollutants. Though combustion of natural gas is not associated with appreciable emissions of toxic pollutants, Rule 1200 requires a toxic health risk assessment for new, relocated, or modified sources of toxics. As with NSR under Rule 20.2, the required assessment was conducted at the time of A/C issuance and found the introduction of these emission units to comply with Rule 1200 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 NOx, CO, and NH3, which is also required by District Rules 69.3, 69.3.1.

Monitoring and testing are required in the existing District permits. For the related 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 also excludes them from being subject to CAM under § 64.2 (b)(vi).

7.0 Permit Shield

In accordance with District Rule 1410(p) and 40 CFR Part 70.6(f), a permit can include a provision precluding the permittee from enforcement action for certain requirements that either do not apply or that are superseded by another requirement to which the permittee is subject, as stated in the permit. A permit shield, if granted, is limited as given by the aforementioned regulations.

A permit shield was requested by the applicant and is provided at Section II. D. of the permit. The requirements listed in the permit shield, from which the permittee is shielded from enforcement action as long as it complies with the permit, were evaluated against the provisions of the aforementioned regulations. Each listed requirement in the permit shield was determined to be acceptable either because it does not apply or because it is superseded in stringency by another requirement remaining in the permit.

8.0 Outside Review

In accordance with District Rule 1415, the District will provide notice to the public and notice to the Environmental Protection Agency Region 9.

9.0 <u>Conclusions / Recommendations</u>

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 Title V. Therefore, the recommendation of this report is for the subject renewal Title V permit to be issued following public notice and EPA review. Project Area Maps

Form 1401-A1 & A2

Stationary Source Summary

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 A Stationary Source Su	APPLICATION mmary (FORM 1401-4	A1)
<u></u>	Company Name an Diego Gas & Electric - Cuyamaca Peak Energy Pla	nt	District Use Only NEDS #
			SITE ID #
. F	ACILITY IDENTIFICATION		
1.	Facility Name (if different than company name): _(Suyamaca Peak Energy P	lant (CPEP)
2.	Four digit SIC Code: 4911	N NT/A	· · · · ·
3.	Parent Company (if different than Company Name): <u>N/A</u>	0
4.	City See Diago	E (Attn: Environmental	Zin 02122
F	City San Diego	State <u>CA</u>	Zip <u>92123</u>
5.	Street Address of Source Location: <u>200 N. Johnso</u>	State CA	7in 02020
6	UTM Coordinator: 27 21017°N 122 04511°E	State <u>CA</u>	Zip <u>92020</u>
0. 7	Source Located within 50 miles of a state line:		(All sources are within 50 miles)
7. 8	Source Located within 1000 feet of a school:	$\square Ves \square No$	(All sources <u>are</u> within 50 lines)
0. Q	Type of Organization:	\square Sole Ownership	Government
9.	Partnershin X Utility Company		
10	Legal Owner's Name: San Diego Gas & Electric (omnany	
11.	Owner's Agent name (if any):	,ompuny	
12.	Responsible Official: Carl LaPeter		
13.	Plant Site Manager/Contact: Casey Williams, Sr. E	nv. Phone #: 760-	432-2506 FAX #: 760-432-2510
14.	Application Contact: Brian Yim, Princ, Env. Spec		
14. 15.	Application Contact: <u>Brian Yim, Princ. Env. Spec</u> Type of Facility: Electric Generation Plant	•	
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* 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
San Diego Gas & Electric - Cuyamaca Peak Energy Pl	NEDS #

MAJOR SOURCE APPLICABILITY I.

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	
PM10	100	
SO ₂	100	
NOx	100	
СО	100	
ODC	100	
LEAD COMPOUNDS	10	
HAZARDOUS AIR POLLUTANTS		
SINGLE HAP	10	
N/A		
COMBINATION HAP	25	
N/A		

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 CPEP Toxic/Criteria Inventory Report	Inventory Year 2019
	09-10-2020
Signature of Responsible Official	Date
Carl LaPeter	(760) 432-2503
Print Name of Responsible Official	Telephone No. of Responsible Official
Plant Manager	
Title of Responsible Official	
II. EMISSIONS CALCULATIONS ATTACHED (as needed)	🛛 Yes 🗌 No
DISTRICT USE	ONLY
Date Application Received:	Application #
Application Filing Fee:	District Received Stamp:
Receipt #:	Fee Code:
SDAPCD – Rev. 01.06	Page 2 of 2

Form 1401-G

Insignificant Activity List

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

TITLE V APPLICATION Insignificant Activity List (FORM 1401-G)

Company Name

San Diego Gas & Electric - Cuyamaca Peak Energy Plant

Facility Address: 200 N. Johnson Avenue, San Diego CA 92020

LIST OF EQUIPMENT – INSIGNIFICANT ACTIVITIES

Place a check mark in the appropriate box for equipment that is considered an insignificant activity based on throughput or equipment capacity.

Exemptions based on Size (Capacity)

	(Condensed Language of Rule)	Appendix A <u>Citation</u>
\boxtimes	Stationary & portable internal combustion engines with \leq 50 bhp output rating	(d)(1)(iii)
	Stationary gas turbines with a power rating of < 0.3 megawatt (MW) or a maximum gross heat input rating of 1 million BTUs per hour	(d)(1)(iv)
	Water cooling towers & ponds with a capacity < 10,000 gal/min not used for evaporative cooling of process water or not used for evaporative cooling of water, contaminated water or industrial waste water from barometric jets or from barometric condensers.	(d)(2)
	Fuel-burning equipment with a maximum gross heat input rate of < 1 million Btu/hour when not part of a process, process line, line, equipment, article, machine or other contrivance for which a permit to operate is required by these Rules and Regulations	(d)(4)(i)
	Fuel burning equipment with a maximum gross heat input of ≤ 20 million Btu/hour, and fired exclusively with natural gas and/or liquefied petroleum gas	(d)(4)(ii)
	Steam boilers, process heaters, and steam generators with a maximum gross heat input of < 5 million Btu/hour	(d)(4)(iii)
	Crucible-type or pot-type furnaces with a brimful capacity of < 450 in ³ of any molten metal	(d)(12)
	Crucible, pot or induction furnaces with a capacity of ≤ 2500 in ³ , in which no sweating or distilling is conducted and from which only non-ferrous metals except yellow brass, are poured or non-ferrous metals are held in a molten state	(d)(13)
	Dry batch mixers with ≤ 0.5 cubic yards rated working capacity	(d)(27)
	Batch mixers (wet) with ≤ 1 cubic yard capacity where no organic solvents, diluents or thinners are used.	(d)(28)
	Roofing kettles (used to heat asphalt) with a capacity of ≤ 85 gallons	(d)(33)
	Abrasive blasting equipment with a manufacturer's-rated sand capacity of < 100 lbs or < 1 ft ³	(d)(34)
	Paper shredders and paper disintegrators that have a capacity of 600 pounds per hour or less, and the	
	associated conveying systems and baling equipment.	(d)(41)
	Ovens having an internal volume of \leq 27 ft ³ in which organic solvents or materials containing organic solvents are charged	(d)(59)
	Cold solvent cleaning tanks, vapor degreasers, and paint stripping tanks with a liquid surface area of \leq 1.0 ft ²	(d)(61)(i)
	Cold solvent cleaning tanks, vapor degreasers, and paint stripping tanks which have a maximum capacity of ≤ 1 gallon	(d)(61)(ii)

SDAPCD-Rev. 6/05

District Use Only NEDS#

SITE ID #

TITLE V APPLICATION Insignificant Activity List (FORM 1401-G)

Continued - Exemptions based on Size (Capacity)

	(Condensed Language of Rule)	Appendix A <u>Citation</u>
\boxtimes	Stationary organic compound storage tanks with a capacity of \leq 250 gallons	(e)(1)
	Liquid surface coating application operations using hand-held brushes for application of a primer coating from containers of \leq eight (8) ounces in size, to fasteners to be installed on aerospace parts	(h)(5)
	Liquid surface coating application operations using air brushes with a coating capacity of ≤ 2 ounces for the application of a stencil coating	(h)(6)
	Metal inspection tanks that: a) do not utilize a suspension of magnetic or fluorescent dye particles in	(o)(5)
	volatile organic solvent, and b) have a liquid surface area < 5 ft ² and c) are not equipped with spray type flow or a means of solvent agitation	
	Bakery ovens used for baking yeast leavened products where the combined rated heat input capacity is < 2 million Btu/hr	(o)(37)
Exem	ptions based on Production Rates (Emission Limits)	
	Printing or graphic arts presses located at a stationary source which emits a total of <15 lbs/day of VOC's subject to Rule 67.16, on each day of operation	(d)(7)
	Solder levelers, hydrosqueegees, wave solder machines, and drag solder machines which use < 10 lbs/day of any material containing VOCs	(d)(23)
	Fire extinguishing equipment, using halons with a charge of < 50 lbs. of a Class I or Class II ozone depleting compound.	(d)(31)
	Coffee roasting equipment with a manufacturer's rating of ≤ 15 lbs/hr	(d)(45)
	Equipment used to manufacture bio-agricultural products for exclusive use in field testing required to obtain FDA, EPA, USDA and /or Cal-EPA approval, provided the uncontrolled emissions of VOCs from all such operations < 5 ton/yr.	(d)(49)(iii)
	Oil quenching tanks which use < 20 gal/yr of make-up oil	(d)(56)
	Equipment that is used to conduct research and develop new or improved processes/products, and is operated by technically trained personnel under the supervision of a research director, and is not used in the manufacture of products for sale or exchange for commercial profit, and all emissions are < 15 lbs/day.	(4)(40)
	Powder coating operations, except metalizing gun operations, where surface preparation or cleaning solvent usage is < 0.5 gal/day	(d)(48) (d)(62)
	Equipment used to transfer fuel to & from amphibious ships for maintenance purposes, provided total annual transfers < 60,000 gal/yr.	(f)(2)
	Stationary storage tanks (excluding tanks subject to Rule 61.9) used exclusively for the storage of liquid organic solvents used as dissolvers, viscosity reducers, reactants, extractants, cleaning agents or thinners provided that emissions < 15 lbs/day.	(e)(3)
	Liquid surface coating or adhesive application operations (portable or stationary) where not more than 20 gallons per year of material containing organic compounds are applied	(h)(1)
	Liquid surface coating application operations exclusively using materials with a VOC content of $< 20 \text{ g/L}$ where $< 30 \text{ gal/day}$ of such materials are applied.	(h)(2)
	Foam manufacturing or application operations which emit < 5 lbs/day of VOCs	(i)(1)
	Reinforced plastic fabrication operations using resins such as epoxy and/or polyester which emit < 5 lbs/day of VOCs	(i)(2)
	Plastics manufacturing or fabrication operations which emit < 5 lbs/day of VOCs	(i)(3)
	Cold solvent degreasers used for educational purpose and which emit < 5 lbs/day of VOCs	(i)(4)

 TITLE V APPLICATION	
 Insignificant Activity List (FORM 1401-G)	
Golf grip application stations which exclusively use liquid materials with an initial boiling point of 450° F (232°C), or greater and which emit < 5 lbs/day of VOCs.	(i)(5)
Batch-type waste-solvent recovery stills with batch capacity of \leq 7.5 gallons for onsite recovery provided the still is equipped with a safety device & VOC emissions are < 5 lbs/day	(i)(6)
Peptide and DNA synthesis operations which emit < 5 lbs/day of VOCs	(i)(7)
Equipment used for washing or drying articles fabricated from metal, cloth, fabric or glass, provided that no organic solvent is employed in the process and that no oil or solid fuel is burned and none of the products being cleaned has residues of organic solvent and VOC emissions are <5 lbs/day	(i)(8)
Hot wire cutting of expanded polystyrene foam which emit < 5 lbs/day of VOCs.	(i)(9)
Any coating and/or ink manufacturing operations located at a stationary source, which emit < 15 lbs/day of VOCs.	(0)(9)
Any operation producing materials for use in cosmetic or pharmaceutical products and/or manufacturing cosmetic or pharmaceutical products by chemical processes, which emit < 15 lbs/day of VOCs	(0)(12)
Refrigeration units except those used as, or with, air pollution control equipment with a charge of < 50 lbs of a Class I or II ozone depleting compound.	(0)(18)
Atmospheric organic gas sterilizer cabinets where ethylene oxide emissions are < 5 lbs/yr	(o)(28)
Aerosol can puncturing/crushing operations which vents all emissions through a properly operated/maintained carbon canister, provided < 500 cans/day are processed.	(o)(29)(ii)
Solvent wipe cleaning operations using a container applicator that minimizes emissions to the air where the uncontrolled emissions of VOCs < 5 ton/yr, or the total purchase of solvents $< 1,500$ gal/yr, or the total purchase of solvents containing a single HAP < 350 gal/yr.	(0)(32)
Equipment approved for use by the EPA for recovering and/or recycling CFCs provided such equipment is charged with < 50 lbs. of a Class I or II ozone depleting compound.	(0)(33)
Stationary IC engines rated at \leq 200 bhp installed and operated before November 15, 2000, which operate $<$ 200 hr/yr.	(o)(34)(ii)

0

Form 1401-H1

Applicable Requirements Summary Check List

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 Applicable Requirements Summary Checklist (FORM 1401-H1) District Use Only NEDS # SDG&E - Cuyamaca Peak Energy Plant NEDS

APPLICABLE REQUIREMENTS: Applicable requirements which apply to an entire facility are listed first. The applicant should check appropriate boxes on the form and attach emission unit specific permit number lists where necessary. Where streamlining is employed, note on this form. If information does not fit in the space allotted, attach documentation and reference it on this form. Type or print legibly.

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Gas Turbine	Emerg Generator							Future Effective Date
F	acility Applicable Requirement Description							 		 	 		
10(a)	Permits Required - (a) Authority to Contruct			x		X							
10(b)	Permits Required – (b) Permit to Operate			x		X							
19	Provision of Sampling & Testing Facilities			Х									
19.2	Continuous Emission Monitoring Requirements				х								
19.3	Emission Information			x									
NSR	New Source Review			X									
PSD	Prevention of Significant Deterioration			x				1					
21	Permit Conditions			Х									
50	Visible Emissions			х	11								
51	Nuisance			x									
60	Circumvention			Х									
67.0	Architectural Coatings	(g)		X									
67.17	Storage of Materials Containing VOC	(e)		Х									
71	Abrasive Blasting			х			-						
98	Breakdown Conditions: Emergency Variance			х									
101	Burning Control			Х									-
131	Stationary Source Curtailment Plan												
132	Traffic Abatement Plan								×				

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Gas Turbine	Emerg Generator						Ê	Future Effective Date
	Equipment Specific Applicable Requirement Descripti	on											
50	Visible Emissions			X	Х	X							
51	Nuisance			x									
52	Particulate Matter	Method 5			S	X						:	
53	Specific Contaminants	Method 5			S	X							
53.1	Scavenger Plants												
54	Dust and Fumes	Method 5											
58	Incinerator Burning												
59	Control of Waste Disposal - Site Emissions	(e)	(e) & (f)			5							
60	Circumvention												
61.1	Receiving & Storing VOCs at Bulk Plants & Terminals	(d)	(c)(7)										
61.2	Transfer of VOCs into Mobil Transport Tanks	(c)(10)											
61.3	Transfer of VOCs into Stationary Storage Tanks		(c)(2)(iii)										
61.4	Transfer of VOCs into Vehicle Fuel Tanks												
61.5	Visible Emissions Standards for Vapor Control Equip.		VE										
61.7	Spillage & Leakage of VOCs												
61.8	Certification Requirements for Vapor Control Equip.												
62	Sulfur Content of Fuels				S	X							
64	Reduction of Animal Matter									-			
66	Organic Solvents	(p)	(0)										
67.1	Alternative Emission Control Plans (AECP)	(c)	(d)									1	
67.2	Dry Cleaning - Petroleum Solvent	(f)	(e)										
67.3	Metal Parts Coating	(g)	(f)										
67.4	Can & Coil Coating	(g)	(f)										
67.5	Paper, Film and Fabric Coating	(f)	(e)										
67.6	Solvent Cleaning Operation	(f)											
67.7	Cutback & Emulsified Asphalt	(f)	(e)										
67.9	Aerospace Coating Operations	(g)	(f)										
67.10	Kelp Processing and Bio-Polymer Mfg.	(f)	(e)										
67.11	Wood Products Coating Operations (not in SIP)												

SDAPCD - Rev. 08.06

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Gas Turbine	Emerg Generator								Future Effective Date
67.12	Polyester Resin Operations	(g)	(f)							<u> </u>				
67.15	Pharmaceutical & Cosmetic Manufacturing	(e)												
67.16	Graphic Arts Operations	(g)	(f)											
67.17	Open VOC Containers	(e)												
67.18	Marine Coating Operations	(g)	(f)											
67.19	Coating and Printing Inks Mfg. Operations	(g)	(f)										2	
	Motor Vehicle & Mobile Equipment Refinishing									 				
67.20	Operations							 		 				
67.21	Adhesive Material Application Operations						 		-					
67.22	Expandable Polystyrene Foam Products													
67.24	Pokory Ovens	(6)	(a)					 		 				
67.24	Evel Ruming Equipment NOv	(1)	(e)											
00	Puel Burning Equipment - NOX	(6)	$(a) P_{\alpha}(a)$					 		 				
69.2	Bollers		$(e) \approx (g)$		S	-	 			 			-	
69.3	Stationary Gas Turbine Engines - RACI	(1)	(e) & (g)		S			 		 				
69.3.1	(not in SIP)	(f)	(e) & (g)											
69.4	Stationary Internal Combustion Engines - RACT	(f)	(e)			X								
	Stationary Internal Combustion Engines - BARCT					х								
69.4.1	(not in SIP)	(f)	(e)					 		 				
70	Orchard Heaters													
71	Abrasive Blasting													
	Applicability, Definitions, Emission Calculations,				X	X								
20.1	Other Requirements (SIP Version 7/5/79)													α.
	NSR - General Provisions (Version 11/4/98) (not in				X	x						<u> </u>		
20.1	SIP)													
20.2	Standards for Authority to Construct Best Available				X	X			=					
	NSR – Non-major Stationary Sources (Version				x	x	 · · · ·	 	1					
20.2	11/4/98) (not in SIP)												[
20.3	Standards for Authority to Construct - Air Quality Analysis (SIP Version 7/5/79)													

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Gas Turbine	Emerg Generator						Future Effective Date
20.3	NSR – Major Stationary Source and PSD Stationary Source (Version 11/4/98) (not in SIP)											
20.4	Standards for Authority to Construct - Major Sources (SIP Version 7/5/79)											
20.4	NSR – Portable Emission Units (Version 11/4/98) (not in SIP)			1								
20.5	Power Plants (SIP Version 7/5/79)											
20.6	Standards for Permit to Operate Air Quality Analysis (SIP Version 7/5/79)											
SUBPART	Regulation X - Standards of Performance for New Stationary Sources (NSPS)	Rule #	Rule #									
A	General Provisions		260.7 260.13		S	х						
D	Standards of Performance for Fossil-Fuel Fired Steam Generators	260.46	260.45									
Da	Standards of Performance for Electric Utility Steam Generating Units Constructed After September 18, 1978	(b):	260.47a 260.48a 260.49a									
Db	Standards of Performance for Industrial- Commercial-Institutional Steam Generating	260.45b 260.46b	260.47b 260.48b 260.49b									
E	Standards of Performance for Incinerators	260.54	260.53									
I	Standards of Performance for Asphalt Concrete Plants	260.93										
к	Standards of Performance for Storage Vessels for Petroleum Liquids Constructed after June 11, 1973 and Prior to May 19, 1978		260.113									
Ka	Standards of Performance for Storage Vessels for Petroleum Liquids Constructed after May 18, 1978	260.113a	260.115a									
Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984	260.113b	260.115b 260.116b									1. 1.

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Gas Turbine	Emerg Generator								Future Effective Date
Subpart							,	 	 		 		 	
L	Standards of Performance for Secondary Lead Smelters	260.123												
М	Standards of Performance for Secondary Brass and Bronze Ingot Production Plants	260.133												
0	Standards of Performance for Sewage Treatment Plants	260.154	260.153											
DD	Standards of Performance for Grain Elevators	260.303												
EE	Standards of Performance for Surface Coating Metal Furniture	260.313 260.316	260.314 260.315											
GG	Standards of Performance for Stationary Gas Turbines	260.335	260.334		S									
, QQ	Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing	260.433 260.435	260.434											
RR	Standards of Performance for the Pressure Sensitive Tape and Label Surface Coating Operations	260.444 260.446	260.445 260.447											
SS	Standard of Performance for the Industrial Surface Coating Large Appliances	260.453 260.456	260.454 260.455											
TT	Standards of Performance for Metal Coil Surface Coating	260.463 260.466	260.464 260.465											
BBB	Standards of Performance for the Rubber Tire Manufacturing Industry	260.543 260.547	260.544 260.545 260.546											
FFF	Standards of Performance for Flexible Vinyl and Urethane Coating and Printing	260.583	260.584 260.585									1		
JJJ	Standards of Performance for Petroleum Dry Cleaners													
SUBPART	New Source Performance Standards (40 CFR 60)												
Cb, F	Portland Cement Plants													
Dc	Small Industrial -Commercial -Institutional Steam Generators >10 MM Btu but <100 MM Btu.									8				
Ea	Municipal Waste Combustors													
G	Nitric Acid Plants													
H & Cb	Sulfuric Acid Plants													

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Gas Turbine	Emerg Generator							Future Effective Date
Subpart	F						 	 	 	 		 	
HHH	Synthetic Fiber Production Facilities												
KKK, LLL	Onshore Natural Gas Processing: VOC Equipment Leaks and SO ₂ Emissions.												
HHH	Synthetic Fiber Production Facilities												
KKK, LLL	Onshore Natural Gas Processing: VOC Equipment Leaks and SO ₂ Emissions.												
NNN	VOC Emissions from Synthetic Organic Chemical Manufacturing Industry Distillation Operations.										~		
000	Standard of Performance for Nonmetallic Mineral Processing Plants												
PPP	Wool Fiberglass Insulation Mfg. Plants												
QQQ	VOC Emissions from Petroleum Refinery Wastewater Systems.												
RRR	VOC Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes.												
SSS	Magnetic Tape Coating Facilities												
TTT	Industrial Surface Coating Surface, Surface Coating of Plastic Parts for Business Machines.												
UUU	Calciners and Dryers in Mineral Industries.												
vvv	Polymeric Coating of Supporting Substances Facilities.												
www	Standards of Performance for Municipal Solid Waste Facilities								÷.				
SUBPART	REGULATION XI - NATIONAL EMISSION STANDARD POLLUTANTS (NESHAPS)	S FOR HAZARI	DOUS AIR					 -					
A	General Provisions												
C, D	Beryllium Extraction Plants; Ceramic Plants, Foundries, Incinerators, Propellant Plants, and Machine Shops that Process Beryllium Containing Material; and Rocket Motor Firing Test Sites.												

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Gas Turbine	Emerg Generator									Future Effective Date
Subpart			1												· · · · · · · · · · · · · · · · · · ·
<u>N</u>	Oxygen Process Furnaces						 								
Na	Oxygen Process Steelmaking Facilities														
Р	Primary Copper Smelters			ъ.,			 								
Q	Primary Zinc Smelters														
R	Primary Lead Smelters														
S	Primary Aluminum Reduction Plants					<u> </u>									
T & U	Phosphate Fertilizer Industry														
V,W,X	Phosphate Fertilizer Industry														
Y	Coal Preparation Plants														
Z	Ferroalloy Production Facilities														
AA, AAa	Steel Plants							11000							
BB	Kraft Pulp Mills														
CC	Glass Manufacturing Plants														
HH	Lime Manufacturing Plants														
KK	Lead-Acid Battery Manufacturing Plants														
LL	Metallic Mineral Processing Plants														
	Automobile and Light-Duty Truck Surface														
MM	Coating Operations						 							 	
NN	Phosphate Rock Plants						 						 		
PP	Ammonium Sulfate Manufacture						 							 	
บบ	Asphalt Processing and Asphalt Roofing Manufacture														
vv	Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry.														
ww	Beverage Can Surface Coating Industry							-							
XX	Bulk Gasoline Terminals									4					
AAA	New Residential Wood Heaters											-			
DDD	VOC Emissions from the Polymer Mfg. Ind.										-				
GGG	Equipment Leaks of VOC in Petroleum Refineries.														

							r	 	 				 	
RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Gas Turbine	Emerg Generator								Future Effective Date
Subpart														
E	Mercury Ore Processing; Manufacturing Processes Using Mercury Chloralkali Cells; and Sludge Incinerators.													
F	Ethylene Dichloride Mfg. Via Oxygen, HCI and Ethylene; Vinyl Chloride Mfg.; and Polyvinyl Chloride Mfg.				ă.									
М	Asbestos Mills; Roadway Surfacing with Asbestos Tailings; Manufacture of Products Containing Asbestos; Demolition; Renovation; and Spraying and Disposal of Asbestos Waste.													
SUBPART	NESHAPS (40 CFR 61)													
B,Q,R, T,W,	Underground Uranium Mines; Dept. of Energy Facilities; Phosphorus Fertilizer Plants; & Facilities Processing or Disposing of Uranium Ore & Tailings. Dept. of Energy; Nuclear Regulatory Commis- sion Licensed Facilities; Other Federal Facilities;													
нік	and Elemental Phosphorus Plants. (Radionuclide)										3			
J,L,Y, BB,FF	Fugitive Process, Storage, and Transfer Equip- ment Leaks; Coke By-Product Recovery Plants; Benzene Storage Vessels; Benzene Transfer Operations; and Benzene Waste Operations. Glass Manufacturer; Primary Copper Smelter; Arsenic Trioxide and Metallic Arsenic Production													
N,O,P	Facilities.													
v	Pumps, Compressors, Pressure Relief Devices, Connections, Valves, Lines, Flanges, Product Accumulator Vessels, etc. in VHAP Service.													
SUBPART	MACT Standards (40 CFR 63)													
F,G, H,I	Amendment: Reopening, Averaging Issue									-				
L	Coke Ovens													
0	Ethylene Oxide Sterilizers													
Q	Industrial Process Cooling Towers													
R	Gasoline Distribution Facilities													

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Gas Turbine	Emerg Generator									Future Effective Date
Subpart	Halanda I Salanda Olancian Damarian		1								T	<u> </u>	<u> </u>		
	Haiogenated Solvent Cleaning Degreasing						-							 	
	Secondary Lead Smelters									 		<u> </u>		 	
Y	Marine Tank Loading/Unloading			<u> </u>						 					
	Petroleum Refineries									 	<u> </u>			 -	
DD	Off-Site Waste and Recovery Operations		1											 	
EE	Magnetic Tape								 	 					
GG	Aerospace (Coatings)									 	-	<u> </u>			
<u> </u>	Shipbuilding for Ship Repair (Surface Coating)		1							 	-				
	Wood Furniture Industry (Coatings)			<u> </u>						 			ļ	 	
KK	Printing and Publishing						L			L					
AAAA	Municipal Solid Waste Landfills								 2		22				
DDDDD	Industrial, Commercial and Institutional Boilers and Process Heaters							1				-			
MMMM	Surface Coating of Miscellaneous Metal Parts and Products														
PPPP	Surface Coating of Plastic Parts														
ZZZZ	Reciprocating Internal Combustion Engines					x									
YYYY	Stationary Combustion Turbines														
	California Airborne Toxic Control Measures (A) 17 CCR	ГСМ)													
893102	Hexavalent Chromium ATCM for Chrome Plating and Chromic Acid Anodizing Operations														
375102	ATCM for Emissions of Perchloroethylene from										-		<u> </u>		
§93109	Dry Cleaning Operations			<u> </u>											
	40 CFR Part 68 RMP			X											
	Title IV - Acid Rain (40 CFR 72)				x										
	Title VI-Ozone Depleting Compounds (40 CFR 8	2)													
В	Servicing of Motor Vehicle Air Conditioners	В										[
F	Servicing of Other Air Conditioners	F												 	

Form 1401-H2

List of Permits by Equipment Category

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 LIST OF PERMITS BY EQUIPMENT CATEGORY (FORM 1401-H2)

Company Name

District Use Only

San Diego Gas & Electric - Cuyamaca Peak Energy Plant

Facility Address: 200 N. Johnson Avenue

NEDS # _____

SITE ID #

San Diego, CA 92020

PERMITTED EMISSION UNITS BY EQUIPMENT CATEGORY

In the emission unit (equipment) category order entered on Form 1401-H1, Applicable Requirements Summary Checklist, list emission units by permit number for the specific emission unit (equipment) category. Under the column labeled status place an "O" if operational, "N" if non-operational, or "S" if the equipment is new and currently operating under a startup authorization. If more space is required, use additional forms. Please type or print legibly.

Emission Unit Category	Application/ Permit No.	Status of Emission Unit
Gas Turbine	APCD2008-PTO- 976021	0
Natural Gas Fired Emergency Generator	APCD2017-APP- 005183	0
		1
		h.
	e	

Page <u>1</u> of <u>1</u>

Form 1401-I

Certification Statement

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 Certification Statement (FORM 1401-I)

Company Name	District Use Only
San Diego Gas & Electric - CPEP	NEDS #
Facility Address: 200 N. Johnson Avenue	SITE ID #
San Diego, CA 92020	

Under penalty of perjury, identify the following: (Read each statement carefully and check each box for confirmation.)

Applicable	Not Applicable		
		Based on information and belief formed after reidentified in this application will continue to conwith which the source is in compliance. The app source(s) is/are not in compliance is/are identific Compliance.	asonable inquiry, the source(s) mply with the applicable requirement plicable requirement(s) with which the died in Form 1401-L, Schedule of
\boxtimes		Based on information and belief formed after re identified in this application will comply with th requirement(s) on a timely basis.	asonable inquiry, the source(s) the future-effective applicable
		Based on information and belief formed after re identified in the Schedule of Compliance applic	asonable inquiry, the source(s) ation form that is/are not in compliance
		with the applicable requirement(s), will comply compliance plan schedule.	in accordance with the attached
\boxtimes		Based on information and belief formed after re application forms, referenced documents, all ac required certifications are true, accurate, and c	asonable inquiry, information on companying reports, and other omplete.
\boxtimes		All fees required by Regulation III, Rule 40 have	e been paid.
	0	ant	09-10-2820
Signature of	of Responsibl	e Official	Date
Carl La	Peter		(760) 432-2503
Print Name	e of Responsi	ble Official	Telepone No. of Responsible Official

Plant Manager Title of Responsible Official Form 1401-M

Abatement Devices

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 Abatement Devices (FORM 1401-M)

Company Name

District Use Only

San Diego Gas & Electric - CPEP

SITE ID # _____

NEDS #

Facility Address: 200 N. Johnson Avenue, San Diego, CA 92020

LIST OF ABATEMENT DEVICES

In numerical order, list all abatement devices, the abatement device, name or description, and the emission unit or operation abated. If more space is required, use additional forms. Please type or print legibly.

Permit No(s)	Abatement Device Name or Description	Emission Unit(s) or Operation(s) Abated
976021*	Selective Catalytic Reduction System and Oxidation Catalyst	Gas Turbine
		2
	· · · · · · · · · · · · · · · · · · ·	

Page <u>1</u> of <u>1</u>

Form 1401-O

Multiple Applicable Requirements Streamlining (MARS)

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 Multiple Applicable Requirements Streamlining (FORM 1401-O)

Company Name San Diego Gas & Electric - CPEP **District Use Only**

Facility Address: 200 N. Johnson Avenue, San Diego CA 92020

SITE ID # _

NEDS #

MULTIPLE APPLICABLE REQUIREMENTS STREAMLINING

If more space is required, use additional forms. Please type or print legibly.

Application No(s) Permit No(s)	Multiple Applicable Requirements	Streamlined Requirements	Attachment Number
976021	Gas Turbine; See Attachment O-1	See Attachment O-1	0-1

Page _1____ of _1____

Form 1401-Q

Request for Permit Shield

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 Permit Shield (FORM 1401-Q)

Company Name

District Use Only

San Diego Gas & Electric - CPEP

Facility Address: 200 N. Johnson Avenue, San Diego CA 92020

REQUEST FOR PERMIT SHIELD

If more space is required, use additional forms. Please type or print legibly.

Application No(s) Permit No(s)	Requirements to be Shielded	Basis	Attachment Number
	SDCAPCD Rule 52 (Particulate	Not applicable, per Section (a),	
976021	Matter)	Rule 53 applies to turbines	
	SDAPCD Rule 53(d)(1) (Specific	Subsumed. (See Attachment O-1	
976021	Contaminants)	re: MARS)	0-1
	SDCAPCD Rule 54 (Dust and	Not applicable as Section (b)	
976021	Fumes)	exempts gaseous fuels burning	
	SDAPCD Rule 62 (Sulfur Content	Subsumed (See Attachment O-1 re:	
976021	of Fuels)	MARS)	0-1
	SDCAPCD Rule 68 (Fuel Burning	Not Applicable per R-69.3 which	
976021	Equipment - NOx)	is specific to turbines	
	SDAPCD Rule 69.3 (Stationary Gas	Subsumed. (See Attachment O-1	
976021	Turbine Engines)	re: MARS)	O-1
	40 CFR Part 60, Subpart GG -NSPS	Subsumed. (See Attachment O-1	
976021	for Stationary Gas Turbines	re: MARS)	0-1
	40 CFR 64 Compliance Assurance	CAM not required per R-69.3 and	
976021	Monitoring (CAM)	CEMS installation	
	SDCAPCD Rule 66 (Organic	×	
976021	Solvents)		

Page <u>1</u> of <u>1</u>

Cuyamaca Peak Energy Plant (CPEP) Greenhouse Gas Potential to Emit Calculations

Facility Name: SDG&E - Cuyamaca Peak Energy Plant

Facility ARB ID: 101663 Facility Reporting Year: 2019

Confidential Data Indication Set to "No" by Reporter

Certification Statement: The designated representative or alternate designated representative must sign (i.e., agree to) this certification statement. If you are an agent and you click on "SUBMIT", you are not agreeing to the certification statement, but are submitting the certification statement on behalf of the designated representative or alternate designated representative who is agreeing to the certification statement. An agent is only authorized to make the electronic submission on behalf of the designated representative, not to sign (i.e., agree to) the certification statement.

Facility Representatives

Designated Representative: HASHIM NAVROZALI Agent: Greg Hauser Agent: Brian Yim Facility Location Physical Address: 200 North Johnson Ave

City: El Cajon State / Province: CA ZIP / Postal Code: 92020 Country: USA

Latitude: 32.7964 Longitude: -116.9711

County: SAN DIEGO Air Basin: SAN DIEGO District: SAN DIEGO COUNTY APCD

Mailing Address: 8315 CENTURY PARK COURT, CP21E City: SAN DIEGO State / Province: CA ZIP / Postal Code: 92123 Country: USA

Payment Information (required if subject to AB 32 Cost of Implementation Fee Regulation)

Responsible Party for Payment: HASHIM NAVROZALI Responsible Party Email: hnavrozali@semprautilities.com Responsible Party Phone: 858-650-4087 Billing Address: 8315 Century Park Court, CP21E City: San Diego State / Province: CA ZIP / Postal Code: 92123 Country: USA

Owners / Operators Name: SAN DIEGO GAS & ELECTRIC

Facility or Entity Total GHG Emissions Summary

CO2 equivalent emissions, excluding biogenic (subparts C – AA): 4,297.78

Metric Tons

Exempt biogenic CO2 emissions		
(subparts C – AA):	0	Metric Tons
CO2 equivalent emissions from fuel		
supplier categories, excluding biogenic		
(subparts MM – NN):	0	Metric Tons
Exempt biogenic CO2 emissions from		
fuel supplier categories (subparts MM		
– NN):	0	Metric Tons
CO2 emissions from CO2 Suppliers		
(excluding biogenic) (subpart PP):	0	Metric Tons
Exempt biogenic CO2 emissions from		
CO2 Suppliers (subpart PP):	0	Metric Tons
CO2 equivalent emissions from		
electric power entities:	0	Metric Tons
Covered CO2 equivalent		
emissions:	4,297.78	Metric Tons
	-	
De Minimis CO2 equivalent emissions:	0	Metric Tons
Maximum allowable De Minimis		
emissions:	128.933276	Metric Tons

General Facility Reporting Information

NAICS Codes

Primary: 221112 (Fossil Fuel Electric Power Generation) Second Primary: Additional:

U.S. Parent Companies

Parent Company Name: SEMPRA ENERGY INC Address: 488 8th Avenue, San Diego, CA 92101 Percentage of Ownership Interest: 100%

GHG Report Start Date: 2019-01-01 GHG Report End Date: 2019-12-31 Explanation of any calculation methodology changes during the reporting year: **EPA e-GGRT Facility IDs** 520983 Full or Abbroviated CHC Report: Full

Full or Abbreviated GHG Report: Full Company or Entity qualifies for Small Business Status: No

Electricity Purchases/Acquisitions for Reporting Facilities (95104(d))

Electricity Provider's Name: Provider's ARB ID: Purchases/Acquisitions: San Diego Gas & Electric (SDG&E) 3004 662 MWh

Natural Gas Purchases/Acquisitions for Reporting Facilities [95115(k), 95103(a)(1)]

Natural Gas Supplier Name: Supplier's ARB ID: Customer Number: Purchases/Acquisitions: San Diego Gas and Electric - Local Distribution 104085 None 80,882

MMBtu

Was this natural gas received directly from an interstate pipeline? No

Do you grant CARB staff permission to share confidential annual natural gas fuel purchase data with your identified natural gas fuel supplier?

Cap-and-Trade Facilities: Increases and Decreases in Facility Emissions [95104(f)]:

For facilities subject to Cap-and-Trade requirements: Have total facility emissions increased or decreased more than 5% in relation to the previous data year? [Not applicable for fuel suppliers, CO2 suppliers, electric power entities, and abbreviated reporters.] Yes Provide a brief narrative description of what caused the increase or decrease in emissions. Include in this GHG emissions decreased in 2019 due description any changes in your air to lower demand from produced permit status. energy. Note: This section is not subject to the third-party verification requirements

Yes

Electricity Generation

Facility has the capacity to gener	rate electricity: Yes	
CEC ID (if applicable):	G0910	
EIA ID (if applicable):	55512	
FERC QFID (if applicable):	N/A	
CAISO ID (if applicable):	ELCAJ_6_UNITA1	
Total Facility Nameplate Generating		
Capacity:	49.5	MW
	Stand-alone electricity generating	
Facility Type:	facility	
Facility's Energy Disposition:	Grid-dedicated facility	

Disposition of Generated Electricity [95112(a)(4)]

<u>Generated Electricity for Grid Disposition [95112(a)(4)(A)]</u> Unit, System Or Group Name GT-1 Retail Provider/Marketer Name San Diego Gas & Electric (SDG&E) Electricity Provided or Sold (MWh) 7,036 Generated electricity used for other on-site industrial processes that are not in support of or a part

Reported emissions include emissions from a cogeneration/bigeneration unit: No

Parasitic Steam Use: Generated thermal energy used for supporting power production (excluding steam used directly for generating electricity) [95112(a)(5)(B)]: Generated thermal energy for on-site industrial applications not related to electricity generation [95112(a)(5)(C)]:

Subpart D: Electricity Generation

Gas Information Details

Gas Name	Gas Quantity (Metric Tons)	_
Methane	0.080	882
Exempt Biogenic Carbon dioxide		0
Nitrous Oxide	0.008	088
Carbon Dioxide	4,293	.57
Total CO2e	4,297	.78
Annual CO2 emissions from sorbent injection:	0	(Metric Tons)
Total Covered CO2e Emissions:	4,297.78	(Metric Tons)
Emissions shown above that are claimed as De Minimis (CO2e):	0	Metric Tons
Unit Details		
Unit Description: Gas combustion tu Part 75 Methodology: Appendix G, E Methodology Start Date: 2013-01-0 Methodology End Date: 2019-12-31 Is this unit/stack/pipe in the Acid Ra Is this configuration a Part 75 unit?	rbine Equation G-4 1 nin Program? Yes Yes	
Electricity Generating Unit Information	mation 49 5	MW
Prime Mover Technology:	Combustion Turbine (Single Cycle)	
Type of Thermal Energy Generation: 95112(b)(2): Gross Generation: 95112(b)(2): Net Generation:	Electricity only EGU 7,434 7,036	MWh MWh
95112(b)(3): Total Thermal Output (for Cogeneration or Bigeneration): 95112(b)(8): Other Steam Used for	0	mmBtu
Electricity Generation: 95112(b)(8): Input Steam to the Steam Turbine (for bottoming cycle	0	mmBtu
cogeneration units only):	0	mmBtu

95112(b)(8): Output of the Heat Recovery Steam Generator (for bottoming cycle cogeneration units		
only):	0	mmBtu
Additional Comments and		
Information:		
Total Annual CO2 Mass Emissions		
Annual CO2 Emissions Including		
Biomass:	4,293.57	metric tons
Annual CO2 Emissions (Fossil Fuels		
Only):	4,293.57	metric tons
Annual CO2 emissions generated from		
sorbent injection:	0	metric tons
Annual Exempt Biogenic CO2		
Emissions:	0	metric tons

Missing Data Information

Total number of source operating hours in the reporting year that fuel flow rate was missing: 0

Total number of source operating hours in the reporting year that high heating value was missing: 0

Fuel-Specific CH4 and N2O Emissions Information

Fuel: Natural Gas		
Annual Mass or Volume of Fuel		
Combusted:	78,401,400	short tons, scf, or gallons
CH4 Emissions:	0.080882	metric tons
N2O Emissions:	0.008088	metric tons
Total CO2e for CH4:	1.698522	metric tons
Total CO2e for N2O:	2.507342	metric tons
Equation Inputs		
Cumulative Annual Heat Input from		
fuel combustion:	80,882	mmBtu
Fuel Specific CH4 Emission Factor:	0.001	kg/mmBtu
Fuel Specific N2O Emission Factor:	0.0001	kg/mmBtu

Time And Date Report Generated: 04/01/2020 16:19

Attachment O-1

MARS (Table 1)

Attachment O-1 Multiple Applicable Requirements Streamlining¹ Gas Turbine (Permit ID: APCD2008-PTO-976021) Table 1. Summary of Multiple Applicable Requirements

Subject	Permit Condition	SDAPCD Rule	Federal Requirement
<u>NOx Emission</u> <u>Rates</u>	SDAPCD NSR; Turbine (No. 976021), Condition No. 12, 17, 18	SDAPCD Rule 69.3(d)(1)(i) SDAPCD Regulation X, Subpart GG, Rule 260.332 (a)(1)	40 CFR Part 60 §60.332(a)(1)
NOx Control Work Practices	SDAPCD NSR; Turbine (No. 976021), Condition Nos. 6, 27, 28, 30	None	None
NOx Emissions Monitoring Requirements: Continuous Emissions Monitoring System	SDAPCD NSR; Turbine (No. 976021), Condition Nos. 12, 17, 18	SDAPCD Rule 69.3(e)(1) and (2), (g)	40 CFR Part 75 §75.10(a)(2) and §75.12(d)
NOx Emissions Recordkeeping Requirements	SDAPCD NSR; Turbine (No. 976021), Condition Nos. 11, 22, 25, 28	SDAPCD Rule 69.3(e)(3)-(5) SDAPCD Regulation X, Subpart A, Rule 260.4(b), 260.7(c)	40 CFR Part 75 §75.57(a), (b), and (d) 40 CFR Part 60 §60.4(b) 40 CFR Part 60 §60.7(c)
SOx Emission Rates	None	SDAPCD Rule 53(d)(1) SDAPCD Regulation X, Subpart GG, Rule 260.333(a)	40 CFR Part 60 § 60.333(a)
Sulfur Content of Fuels	SDAPCD NSR; Turbine (No. 976021), Condition No. 3	SDAPCD Rule 62(b)(1) SDAPCD Regulation X, Subpart GG, Rule 260.333(b)	40 CFR Part 60 § 60.333(b)
Sulfur Content of Fuels <u>Monitoring</u> and <u>Recordkeeping</u> Requirements	SDAPCD NSR; Turbine (No. 976021), Condition Nos. 3 and 21	SDAPCD Regulation X, Subpart A, Rule 260.4(b), 260.7(c)	40 CFR Part 60 §60.4(b) 40 CFR Part 60 §60.7(c)

¹ As noted on Form 1401-O, multiple requirements were identified pertaining to the gas turbine (for normal, non-commissioning, operations): (1) NOx emission limits, (2) SOx emission limit, and (3) sulfur content of fuel. The following is a discussion of the applicable requirements, determination of the most stringent emission limit and associated monitoring and record keeping requirements, and proposed streamlined requirements.

Attachment O-1

(A) NOx EMISSIONS FROM GAS TURBINE

Step One: Identification of	• SDAPCD Rule 69.3(d)(1)(i)
multiple requirements	Emissions concentration of oxides of nitrogen (NOx) from any unit subject to this
	rule, calculated as nitrogen dioxide at 15% oxygen on a dry basis, shall not exceed
	42 parts per million by volume (ppmv) when operated on a gaseous fuel.
	• SDAPCD Regulation X, Subpart GG, Rule 260.332(a)(1)
	(See below for 40 CFR 60 applicable requirement; Rule is the equivalent of
	40 CFR 60 incorporated by reference.)
	• SDAPCD NSK; (No. 9/6021), Condition 12
λ.	- THE EMISSIONS OF OXIDES OF NITROGEN (NOX), CALCULATED
	NOT EXCEED 9 PARTS PER MILLION VOLUME ON A DRY BASIS
	(PPMVD) CORRECTED TO 15% OXYGEN AND AVERAGED OVER
	EACH CLOCK HOUR AND SHALL NOT EXCEED 3.5 PPMVD
	CORRECTED TO 15% OXYGEN AND AVERAGED OVER EACH
	ROLLING 3-CLOCK HOUR PERIOD. COMPLIANCE WITH THESE
	LIMITS SHALL BE DEMONSTRATED CONTINUOUSLY BASED ON THE CEMS DATA AND BASED UPON SOURCE TESTING
	CALCULATED AS THE AVERAGE OF THREE SUBTESTS. THIS
	LIMIT SHALL NOT APPLY DURING THE FIRST 30 MINUTES OF
	ANY STARTUP, LAST 30 MINUTES OF ANY SHUTDOWN, OR
	DURING APPROVED PERIODS OF TESTING, TUNING, AND
	MAINTENANCE, AS DEFINED IN THIS PERMIT.
	• SDAPCD NSP. (No. 076021) Condition 17
	• SDATCD INSK, (10. 770021), Condition 17 EMISSIONS OF OVIDES OF NUTPOCEN (NOV) SHALL NOT
	= EMISSIONS OF OXIDES OF MITROGEN (NOX) SHALL NOT EXCEED 7.2 POUNDS PER HOUR AVERAGED OVER EACH
	ROLLING 3-HOUR PERIOD. COMPLIANCE WITH THIS LIMIT
	SHALL BE DEMONSTRATED CONTINUOUSLY BASED ON CEMS
	DATA AND CASED ON SOURCE TESTING CALCULATED AS THE
	AVERAGE OF THREE SUBTESTS. THESE LIMITS SHALL NOT
	30 MINUTES OF ANY SHUTDOWN OR DURING APPROVED
	PERIODS OF TESTING, TUNING, AND MAINTENANCE, AS
	DEFINED IN THIS PERMIT.
	 SDAPCD NSR; (No. 976021), Condition 18
	 EMISSIONS OF OXIDES OF NITROGEN (NOX) SHALL NOT
	EXCEED 173 POUNDS IN ANY CALENDAR DAY NOR EXCEED 31.6
	TONS IN ANY CALENDAR YEAR. COMPLIANCE WITH THIS LIMIT
	SHALL BE DEMONSTRATED BASED ON CEMIS DATA.
	• 40 CFR Part 60 Subpart GG, §60.332(a)(1)
	No owner or operator subject to the provisions of this subpart shall
	cause to be discharged into the atmosphere from any stationary gas
	turbine, any gases which contain nitrogen oxides in excess of:
	OTT 0 0075 (14.4)
	SID = 0.0075 + F
	[The facility's turbine parameters are as follows: 49.5 MW. 500 MMBTU/hr = 528
	kJ/hr; $Y = 10.67$ kJ/watt-hr; $F = 0.005$ for natural gas with nitrogen content of
	0.2610%. Therefore, the emission limit is: 151 ppmdv @ 15% O ₂ .]
Store Transa Determine and	The CDADCD NCD memory is limited and
Step Iwo: Determine most	The SDAPCD NSK permit limits are:
stringent NUX emission	3.5 ppmvd @ 15% O2 (3-CLOCK HOUR)

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Attachment O-1

limit	9.0 ppmvd @ 15% O2 (1-CLOCK HOUR)
	The NOx emission limits in the SDAPCD NSR permits are the most
	stringent of the multiple requirements and therefore the streamlined
	requirements. The other limits are subsumed.
Step Three: Evaluate work	• SDAPCD Rule 69.3: None.
practice requirements	• SDAPCD Regulation X, Subpart GG, Rule 260.300: None
	• SDAPCD NSR. Turbine (No. 976021). Condition 27
	- A CONTINUOUS EMISSION MONITORING SYSTEM (CEMS) SHALL
	BE INSTALLED AND PROPERLY MAINTAINED AND CALIBRATED
	IN ACCORDANCE WITH AN APPROVED CEMS PROTOCOL TO
	MEASURE, CALCULATE AND RECORD THE FOLLOWING, IN
	ACCORDANCE WITH THE APPROVED CEMS PROTOCOL:
	NITROGEN (NOX) CORRECTED TO 15% OXYGEN IN PARTS
	PER MILLION (PPM)
	(B) HOURLY AVERAGE CONCENTRATION OF CARBON
	MONOXIDE (CO) CORRECTED TO 15% OXYGEN, IN PARTS
	PER MILLION (PPM)
	(C) PERCENT OXYGEN (O2) IN THE EXHAUST GAS (%)
	(D) AVERAGE CONCENTRATION OF OXIDES OF NITROGEN (NOX) CORRECTED TO 15% OXYGEN FOR FACH
	CONTINUOUS ROLLING 3-HOUR PERIOD, IN PARTS PER
	MILLION (PPM)
	(E) HOURLY MASS EMISSIONS OF OXIDES OF NITROGEN (NOX),
	IN POUNDS
	(F) DAILY MASS EMISSIONS OF OXIDES OF NITROGEN (NOX), IN POUNDS
	(G) MONTHLY MASS EMISSIONS OF OXIDES OF NITROGEN
	(NOX), IN POUNDS
	(H) ANNAUL MASS EMISSIONS OF OXIDES OF NITROGEN (NOX),
	IN TONS
	(I) HOURLY MASS EMISSIONS OF OXIDES OF CARBON
	(I) DAILY MASS EMISSIONS OF CARBON MONOXIDE (CO) IN
	POUNDS
	(K) MONTHLY MASS EMISSIONS OF CARBON MONOXIDE (CO),
	IN POUNDS
	(L) ANNAUL MASS EMISSIONS OF CARBON MONOXIDE (CO), IN TONS
	THE CEMIS SHALL BE OPERATED IN ACCORDANCE WITH THE
	WHEN THE UNIT IS IN OPERATION. A COPY OF THE CEMS
	MONITORING PROTOCOL SHALL BE MAINTAINED ONSITE AND
	MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.
	SDADCD NED. Tunking (No 076021) Can dition 20
	• SUAL OF INSK; I ULDING (190.7 /0021), CONDITION 20 WHEN THE CEMS IN NOT RECORDING DATA AND THE UNIT IS
1	OPERATING, HOURLY NOX EMISSIONS SHALL BE DETERMINED
	IN ACCORDNACE WITH 40 CFR75 APPENDIX C. ADDITIONALLY,
	HOURLY CO EMISSIONS SHALL BE DETERMINED USING THE
	HOURLY EMISSION RATE RECORDED BY THE CEMS DURING
	THE MOST RECENT HOURS IN WHICH THE UNIT OPERATED 3
	RATING, ALTERNATE CO EMISSION FACTORS SHALL BE

Page 3 of 12 for Attachment O-1

Attachment O-1		
	DETERMINED FROM COMPLIANCE SOURCE TEST EMISSIONS DATA. THE ALTERNATE HOURLY CO EMISSION RATE SHALL BE REVIEWED AND APPROVED BY THE DISTRICT IN WRITING.	
	• SDAPCD NSR: Turbine (No. 976021), Condition 6	
	 EXCEPT DURING STARTUPS, SHUTDOWNS OR DURING APPROVED PERIODS OF TESTING, TUNING AND MAINTENANCE AS DEFINED IN THIS PERMIT, THE AIR POLLUTION CONTROL SYSTEM INCLUDING THE WATER INJECTION SYSTEM, IF EQUIPPED WITH WATER INJECTION, AND THE AMMONIA INJECTION SYSTEM SERVING THE SCR, SHALL BE IN OPERATION IN ACCORDANCE WITH MANUFACTURER'S SPECIFICATIONS AT ALL TIMES WHEN THE UNIT IS IN OPERATION. ALL MANUFACTURER'S SPECIFICATIONS SHALL BE MAINTAINED ON SITE OR AT A DISTRICT-APPROVED ALTERNATE LOCATION AND MADE AVAILABLE TO DISTRICT PERSONNEL WITHIN 48 HOURS AFTER REQUEST. 	
	 SDAPCD NSR; Turbine (No. 976021), Condition 30 THIS UNIT SHALL BE SOURCE TESTED TO DEMONSTRATE COMPLIANCE WITH THE NOX, CO, VOC, AND AMMONIA EMISSION STANDARDS OF THIS PERMIT, USING DISTRICT APPROVED METHODS. THE COURSE TEST AND THE NOX AND CO RATA TESTS SHALL BE CONDUCTED IN ACCORDANCE WITH THE RATA FREQUENCY REQUIREMENTS OF 40 CFR 75, APPENDIX B, SECTIONS 2.3.1, AND 2.3.3. 	
	• 40 CFR Part 60 Subpart GG: None The streamlined work practice requirement will be the work practices associated with the most stringent emission limit in the SDAPCD NSR permits. The work practices contained in the SDAPCD NSR permits are considered to be the streamlined requirements.	
Step Four: Evaluate monitoring requirements	• SDAPCD Rule 69.3(e)(1) and (2), (g) Continuous monitoring for operational characteristics of the unit and NOx emissions reduction system including: (i)exhaust gas flow rate; (ii)exhaust gas temperature; (iii)ammonia injection rate; (iv)water injection rate; and (v)stack-gas oxygen content.	
	An owner or operator of any unit with a continuous emission monitoring system (CEMS) which has been installed to measure NOx emissions pursuant to any federal regulation shall certify, calibrate and maintain the CEMS in accordance with applicable federal regulations including the reporting requirements of Sections 60.7(c), 60.7(d), and 60.13 of Title 40, Code of Federal Regulations Part 60 (40 CFR 60), performance specifications of Appendix B of 40 CFR 60, quality assurance procedures of Appendix F of 40 CFR 60, and a protocol approved in writing by the Air Pollution Control Officer.	
	Any required source testing shall be performed at no less than 80% of the power rating. A unit subject to the requirements of Section (d) shall be tested for compliance at least annually before the Permit to Operate renewal date, unless otherwise specified in writing by the Air Pollution Control Officer.	

Attachment O-1		
	 SDAPCD NSR; Turbine (No.976021), Conditions 25 THE UNIT SHALL BE EQUIPPED WITH CONTINUOUS MONITORS TO MEASURE, CALCULATE AND RECORD THE FOLLOWING OPERATIONAL CHARACTERISTICS: 	
	A. HOURS OF OPERATION (HOURS); B. NATURAL GAS FLOW RATE (KSCFH); C. SCR AVERAGE TEMPERATURE (DEGREES FAHRENHEIT); D. AMMONIA INJECTION PATE (LBS/HOUR);	
	E. NET POWER OUTPUT TO GRID (MW); F. WATER (FOR NOX CONTROL) INJECTION RATE (LB/HR) IF EQUIPPED WITH WATER INJECTION.	
	THESE PARAMETERS SHALL BE CONTINUOUSLY MONITORED. THESE MONITORS SHALL BE CALIBRATED AND MAINTAINED IN ACCORDANCE WITH MANUFACTURER'S RECOMMENDED	
	PROCEDURES AND A PROTOCOL APPROVED BY THE DISTRICT.	
	 SDAPCD NSR; Turbine (No.976021), Conditions 11 A CONTINUOUS EMISSION MONITORING SYSTEM (CEMS) SHALL BE MAINTAINED AND CALIBRATED TO MEASURE AND RECORD THE CONCENTRATIONS OF OXIDES OF NITROGEN (NOX) AND CARBON MONOXIDE (CO) IN THE EXHAUST GAS ON A DRY BASIS (PPMVD) CORRECTED TO 15% OXYGEN, AND IN POUNDS PER HOUR. THE CEMS SHALL ALSO MEASURE THE OXYGEN CONTENT (O2) IN THE EXHAUST GAS. THE CEMS SHALL BE IN FULL OPERATION AT ALL TIMES WHEN THE UNIT IS IN OPERATION. 	
	 SDAPCD NSR; Turbine (No.976021), Conditions 22 THE OXIDES OF NITROGEN (NOX) AND OXYGEN (O2) CEMS SHALL BE CERTIFIED AND MAINTAINED IN ACCORDANCE WITH APPLICABLE FEDERAL REGULATIONS INCLUDING THE REQUIREMENTS OF SECTIONS 75.10 AND 75.12 OF TITLE 40, CODE OF FEDERAL REGULATIONS PART 75 (40 CFR75), THE 	
	THE QUALITY ASSURANCE PROCEDURES OF APPENDIX B OF 40 CFR 75 AND THE CEMS PROTOCOL APPROVED BY THE DISTRICT. THE CARBON MONOXIDE (CO) CEMS SHALL BE CERTIFIED AND MAINTAINED IN ACCORDANCE WITH 40 CFR 60.	
8	• 40 CFR Part 75, §75.10(a)(2) and §75.12(d) To determine NOx emissions, the owner or operator shall install, certify, operate, and maintain, in accordance with all the requirements of this part, a NOx-diluent continuous emission monitoring system (consisting of a NOx pollutant concentration monitor and an O2 or CO2 diluent gas monitor) with an automated data acquisition and handling system for measuring and recording NOx concentration (in ppm), O2 or CO2 concentration (in percent O2 or CO2) and NOx emission rate (in lb/MMBtu) discharged to the atmosphere;	
	Gas-fired peaking units or oil-fired peaking units. The owner or operator of an affected unit that qualifies as a gas-fired peaking unit or oil-fired peaking unit, as defined in § 72.2 of this chapter, based on information submitted by the designated representative in the monitoring plan shall comply with one of the following:	
	(1) Meet the general operating requirements in §75.10 for a NOx continuous emission monitoring system; or (2) Provide information satisfactory to the Administrator using the procedure specified in appendix E of this part for estimating	

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	hourly NOx emission rate.
	The streamlined monitoring requirements will be the monitoring requirements associated with the most stringent emission limit in the SDAPCD NSR permits. The monitoring requirements contained in the SDAPCD NSR permits are considered to be the streamlined requirements. Any other monitoring requirements are subsumed.

(A) NOx EMISSIONS FROM GAS TURBINE (continued)

Step Five: Evaluate recordkeeping / reporting	 SDAPCD Rule 69.3(e)(3)-(5) Maintain an operating log and record actual times and duration of all startups, shutdowns and fuel changes, and the type and quantity of each fuel used; record the hours of operation for non-emergency purposes and during each emergency situation; maintain all records required by Section (e) for a minimum of two calendar years. SDAPCD Regulation X, Subpart A, Rule 260.4(b), 260.7(c) (See below for 40 CFR 60 applicable requirement; Rule is the equivalent of 40 CFR 60 incorporated by reference.) SDAPCD NSR; Turbine (No.976021), Conditions 11 A CONTINUOUS EMISSION MONITORING SYSTEM (CEMS) SHALL PE MADITALINED AND CALIBRATED TO MEASURE AND
	RECORD THE CONCENTRATIONS OF OXIDES OF NITROGEN (NOX) AND CARBON MONOXIDE (CO) IN THE EXHAUST GAS ON A DRY BASIS (PPMVD) CORRECTED TO 15% OXYGEN, AND IN POUNDS PER HOUR. THE CEMS SHALL ALSO MEASURE THE OXYGEN CONTENT (O2) IN THE EXHAUST GAS. THE CEMS SHALL BE IN FULL OPERATION AT ALL TIMES WHEN THE UNIT IS IN OPERATION.
	 SDAPCD NSR; Turbine (No.976021), Conditions 21 AN OPERATING LOG OR DATA ACQUISITION AND HANDLING SYSTEM (DAHS) RECORDS SHALL BE MAINTAINED EITHER ONSITE, OR AT A DISTRICT-APPROVED ALTERNATE LOCATION TO RECORD ACTUAL TIMES AND DURATIONS OF ALL STARTUPS AND SHUTDOWNS, QUANTITY OF FUEL USED (MONTHLY AND ANNUAL), HOURS OF DAILY OPERATION, AND TOTAL CUMULATIVE HOURS OF OPERATION DURING EACH CALENDAR YEAR.
	 40 CFR Part 75 §75.57(a), (b), and (d) Maintain for each affected unit a file of all measurements, data, reports, and other information required by this part at the source in a form suitable for inspection for at least three (3) years from the date of each record. The owner or operator shall record for each hour the required information on unit operating time, heat input rate, and load, separately for each affected unit. The owner or operator shall record the applicable information required for NOx emissions monitoring for each affected unit for each hour or partial hour during which the unit operates. 40 CFR Part 60 §60.4(b), §60.7(c) Administrator to delegate to each State, when appropriate, the authority to implement and enforce standards of performance for new stationary sources located in such State. All information required to be submitted to EPA must

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			~ ~

	 also be submitted to the appropriate State Agency of any State to which this authority has been delegated (provided, that each specific delegation may except sources from a certain Federal or State reporting requirement). Each owner or operator required to install a continuous monitoring device shall submit excess emissions and monitoring systems performance report and-or summary report form to the Administrator semiannually, except when: more frequent reporting is specifically required or the Administrator, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th day following the end of each six-month period. The recordkeeping requirements in the SDAPCD NSR permits and 40 CFR Part 75 §75.57(a), (b), and (d) are the most stringent and therefore the streamlined requirements. The other requirements are subsumed.
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(B) SOX EMISSIONS FROM GAS TURBINE

Step One: Identification	• SDAPCD Rule 53(d)(1)	
of multiple requirements	A person shall not discharge into the atmosphere from any single source of	
	emission whatsoever Sulfur compounds calculated as sulfur dioxide (SO2) in	
	excess of 0.05 percent, by volume, on a dry basis.	
	• SDAPCD Regulation X, Subpart GG, Rule 260.333(a)	
	(See below for 40 CFR 60 applicable requirement; Rule is the equivalent of 40	
	CFR 60 incorporated by reference.)	
	• SDAPCD NSR; Turbine (No. 976021): None	
	• 40 CFR Part 60 Subpart GG §60.333(a)	
	No owner or operator subject to the provisions of this subpart shall cause to be	
0	discharged into the atmosphere from any stationary gas turbine any gases which	
	contain sultur dioxide in excess of 0.015 percent by volume at 15 percent	
	oxygen and on a dry basis.	
	NOTE: 0.015 % dry volume equals 0.02 % dry volume for the gas turbine at	
	actual O2.	
Step Two: Determine	• SDAPCD Rule 53(d)(1)	
most stringent SOx	0.05 % dry volume	
emission limit	• SDAPCD Regulation X Subnart GG, Rule 260 333(a)	
	(See below for 40 CFR 60 applicable requirement: Rule is the equivalent of 40	
÷	CFR 60 incorporated by reference.)	
	• SDAPCD NSR: Turbine (No. 976021): None	
	• 40 CFR Part 60 Subnart GG, 860.333(a)	
	0.015% dry volume @ 15% O2	
	0.01570 dry Volume (g 1570 02	
	NOTE: Limits on sulfur content of fuel (PUC) inherently ensures compliance	
	w/these limits. See sulfur content demonstration (Attachment O-1, Item C).	
	0.015 % dry volume equals 0.02 % dry volume for the gas turbine	
	at actual O2. By satisfying the $60.333(a)$ limit, the other limit is	
	also satisfied. Therefore, the Subpart GG limit is the streamlined	
	 40 CFR Part of Subpart GG, god.333(a) 0.015% dry volume @ 15% O2 NOTE: Limits on sulfur content of fuel (PUC) inherently ensures compliance w/these limits. See sulfur content demonstration (Attachment O-1, Item C). 0.015 % dry volume equals 0.02 % dry volume for the gas turbine at actual O2. By satisfying the §60.333(a) limit, the other limit is also satisfied. Therefore, the Subpart GG limit is the streamlined 	

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limit. The other requirement is subsumed.

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Attachment O-1 (B) SOx EMISSIONS FROM GAS TURBINE (continued)

Step Three: Evaluate	SDAPCD Rule 53: None
work practice	• SDAPCD Regulation X Subpart GG: None
requirements	• SDAPCD NSR; Turbine (No. 976021): None
	• 40 CFR Part 60 Subpart GG: None
Step Four: Evaluate	SDAPCD Rule 53: None
monitoring requirements	SDAPCD Regulation X Subpart GG: None
	SDAPCD NSR; Turbine (No. 976021): None
	• 40 CFR Part 60 Subpart GG: None
Stop Fiver Evaluate	CDADCD Date 52: Name
Step Five: Evaluate	• SDAPCD Rule 55: None SDBACD Develotion V Sectorert A. Deck 200 4(k) 200 7(c)
reporting	• SUFACD Regulation & Subpart A, Rule 200.4(b), 260.7(c) See below for 40 CER 60 applicable requirement. Puls is the aquivalent of 40
reporting	CFR 60 incorporated by reference.)
	• SDAPCD NSR; Turbine (No. 976021): None
à.	• 40 CFR Part 60 §60.4(b), §60.7(c)
	 Administrator to delegate to each State, when appropriate, the authority to implement and enforce standards of performance for new stationary sources located in such State. All information required to be submitted to EPA must also be submitted to the appropriate State Agency of any State to which this authority has been delegated (provided, that each specific delegation may except sources from a certain Federal or State reporting requirement). Each owner or operator required to install a continuous monitoring device shall submit excess emissions and monitoring systems performance report and-or summary report form to the Administrator semiannually, except when: more frequent reporting is specifically required or the Administrator, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th day following the end of each sixmonth period.
·	 NOTE: The SDAPCD has been delegated authority to implement and enforce NSPS requirements and therefore is the agency to which all information required under NSPS is submitted. SDAPCD Rule 53 has no requirements for recordkeeping. Therefore, the recordkeeping requirements of Rule §60.333 are the streamlined requirements, and the reporting requirements of the above listed 40 CFR Part 60 are the streamlined requirements.

Attachment O-1 (C) SULFUR CONTENT IN FUEL FOR GAS TURBINE

Step One: Identification	• SDAPCD Rule 62(b)(1)
of multiple requirements	A person shall not operate any stationary fuel-burning equipment subject to this
	rule unless any gaseous fuel used contains no more than 10 grains of sultur compounds, calculated as hydrogen sulfide, per 100 cubic feet of dry gaseous
	fuel (0.23 grams of sulfur compounds, calculated as hydrogen sulfide, per cubic
	meter of dry gaseous fuel), at standard conditions.
	• SDAPCD Regulation X Subpart GG, Rule 260.333(b)
	(See below for 40 CFR 60 applicable requirement; Rule is the equivalent of 40
	CFR 60 incorporated by reference.)
	• SDAPCD NSR; Turbine (No. 976021), Condition 3
	The unit shall be fired on Public Utility Commission (PUC) quality natural gas only. The applicant shall maintain on site quarterly records of the natural gas sulfur content (grains of sulfur compounds per 100 dscf of natural gas) and the higher and lower heating values (Btu/scf) of the natural gas, and provide such records to District personnel upon request.
	NOTE: The total sulfur content in the natural gas is specified in the PUC Rule 30 (see attached) to be less than 0.75 grains/100 cubic ft.
	• 40 CFR Part 60 Subpart GG 860.333(b)
	No owner or operator subject to the provisions of this subpart shall burn in any
	stationary gas turbine any fuel which contains total sulfur in excess of 0.8
Sten Two: Determine	• SDAPCD Rule 62(b)(1)
most stringent limit	10.0 grains/100 cubic ft sulfur as H2S
most stringent millt	• SDAPCD Regulation X Subpart GG, Rule 260.333(b)
	(See below for 40 CFR 60 applicable requirement; Rule is the equivalent of 40 CFR 60 incorporated by reference.)
	• SDAPCD NSR; Turbine (No. 976021), Condition 3
	The turbine shall be fired on Public Utility Commission (PUC) quality natural
	gas only.
	• 40 CFR Part 60 Subpart GG, §60.333(b)
	0.8% suntil by weight (8,000 ppinw)
	SDG&E is the only supplier of natural gas in the San Diego area.
	The total sulfur content in the natural gas is specified in the PUC
	Rule 30 to be less than 0.75 grains/100 cubic ft. The most stringent
	limit is the SDAPCD NSR permit limit requiring PUC natural gas
	firing. All other requirements are subsumed.
Step Three: Evaluate	• SDAPCD Rule 62: None
work practice	 SDAPCD Regulation X Subpart GG: None
requirements	• SDAPCD NSR A/C, Turbine (No. 976021): None
	 40 CFR Part 60 Subpart GG: None

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(C) SULFUR CONTENT IN FUEL FOR GAS TURBINE (continued)

Ston Four Evaluate	A SDADCD Dule 624 Name
Step Four. Evaluate	• SDAFCD Rule 02: None
monitoring requirements	• SDAPCD Regulation X Subpart GG: None
	 SDAPCD NSR; Turbine (No.976021), Conditions 3
	- THE UNIT SHALL BE FIRED ON PUBLIC UTILITY
	COMMISSION (PUC) QUALITY NATURAL GAS ONLY. THE
	PERMITTEE SHALL MAINTAIN QUARTERLY RECORDS OF
	SULFUR CONTENT (GRAINS/100 DSCF) AND HIGHER AND
	LOWER HEATING VALUES (BTU/DSCF) OF THE NATURAL
	GAS AND PROVIDE SUCH RECORDS TO THE DISTRICT
	PERSONNEL UPON REQUEST.
1	
	• SDAPCD NSR; Turbine (No. 976021), Condition 21
	 AN OPERATING LOG OR DATA ACQUISITION AND
	HANDLING SYSTEM (DAHS) RECORDS SHALL BE
	MAINTAINED EITHER ONSITE OR AT A DISTRICT-APPROVED
	ALTERNATE LOCATION TO RECORD ACTUAL TIMES AND
	DUKATIONS OF ALL STAKTUPS AND SHUTDOWNS,
	QUANTITYE OF FUEL USED (MONTHLY AND ANNUAL),
	HOURS OF DAILY OPERATION, AND TOTAL COMULATIVE
	HOURS OF OPERATION DURING EACH CALENDAR TEAR.
	40 CFR Part 60 Subpart CC: None
	- to CI ICI all of Subpart GG. Hold
	SDG&F is the only symplian of natural gas in the San Diago grea
	The total sulfur content in the natural cas is specified in the DIIC
	The total sujur content in the natural gas is specified in the POC
	Rule 30 to be less than 0.75 grains/100 cubic ft. The most stringent
	(and therefore streamlined) monitoring requirement is in the
	SDAPCD NSR permit, which requires monitoring of the natural
	gas supply sulfur content and heat values, and of the gas flow.

(C) SULFUR CONTENT IN FUEL FOR GAS TURBINE (continued)

Step Five: Evaluate	SDAPCD Rule 62: None
recordkeeping /	• SDAPCD Regulation X Subpart A, Rule 260.4(b), 260.7(c):
reporting	(See below for 40 CFR 60 applicable requirements; Rule is the equivalent of 40
	CFR 60 incorporated by reference.)
	• SDAPCD NSR; Turbine (No.976021), Conditions 3
	- THE UNIT SHALL BE FIRED ON PUBLIC UTILITY
а.	COMMISSION (PUC) QUALITY NATURAL GAS ONLY. THE
	PERMITTEE SHALL MAINTAIN QUARTERLY RECORDS OF
	SULFUR CONTENT (GRAINS/100 DSCF) AND HIGHER AND
	LOWER HEATING VALUES (BTU/DSCF) OF THE NATURAL
	GAS AND PROVIDE SUCH RECORDS TO THE DISTRICT
	PERSONNEL UPON REQUEST.
	SDAPCD NSR; Turbine (No. 976021), Condition 21
	 AN OPERATING LOG OR DATA ACQUISITION AND
	HANDLING SYSTEM (DAHS) RECORDS SHALL BE
	MAINTAINED EITHER ONSITE OR AT A DISTRICT-APPROVED
	ALTERNATE LOCATION TO RECORD ACTUAL TIMES AND
	DURATIONS OF ALL STARTUPS AND SHUTDOWNS,
	QUANTITYE OF FUEL USED (MONTHLY AND ANNUAL),

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HOURS OF DAILY OPERATION, AND TOTAL CUMULATIVE HOURS OF OPERATION DURING EACH CALENDAR YEAR.
 40 CFR Part 60 §60.4(b), §60.7(c) Administrator to delegate to each State, when appropriate, the authority to implement and enforce standards of performance for new stationary sources located in such State. All information required to be submitted to EPA must also be submitted to the appropriate State Agency of any State to which this authority has been delegated (provided, that each specific delegation may except sources from a certain Federal or State reporting requirement). Each owner or operator required to install a continuous monitoring device shall submit excess emissions and monitoring systems performance report and-or summary report form to the Administrator semiannually, except when: more frequent reporting is specifically required or the Administrator, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th day following the end of each sixmonth period.
NOTE: The SDAPCD has been delegated authority to implement and enforce NSPS requirements and therefore is the agency to which all information required under NSPS is submitted.
SDG&E is the only supplier of natural gas in the San Diego area. The total sulfur content in the natural gas is specified in the PUC Rule 30 to be less than 0.75 grains/100 cubic ft. SDAPCD Rule 62 and NSR Permit Conditions have no requirements for reporting. The streamlined recordkeeping and reporting requirements are the NSR permit conditions.

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Excerpt from CPUC Rule 30 Transportation of Customer Procured Gas

(Specifies Natural Gas Quality Standards including Sulfur Content)

	cnG.							
San Diego Ga			Original	Cal. P.U.C. Shee	t No	16813-G		
San Di	ego, California	Canceling	Original	Cal. P.U.C. Sheel	t No.	15879-G		
			RULE 3	D		Sheet 12 N		
	TRANSI	PORTATION	OF CUST	OMER-OWNED	GAS	N		
3. 4.	<u>TRANSPORTATION OF CUSTOMER-OWNED GAS</u> Utility shall render to customer an invoice for the transportation services hereunder showing the quantities of gas, expressed in therms, delivered to utility for customer's account, at each point of receipt and the quantities of gas, expressed in therms, redelivered by utility for customer's account at each point of delivery during the preceding billing period. Customer shall pay such amounts due hereunder upon presentation of the bill, and in accordance with the provisions of Rule 9. In order to match interstate pipeline allocated calendar month delivery to usage, noncore transportion-only gas customers will be billed on a calendar month basis. Core transportation-only customers will remain in their regular billing cycle, but will have their average daily usage projected to a calendar month amount for the purpose of matching interstate pipeline allocated calendar month based on that month's actual average daily usage.							
l. <u>Gas D</u>	elivery Specifications					Ţ		
1.	The natural gas delivered into the Utility System Operator's system shall conform to the gas quality specifications as provided in any applicable agreements and contracts currently in place between the entity delivering such natural gas and the Utility System Operator at the time of the delivery. If no such agreement is in place, the natural gas shall conform to the gas specifications as defined below.							
2.	Gas delivered into the Utility System Operator's system for the account of a customer for which there is no existing contract between the delivering pipeline and the Utility System Operator shall be at a pressure such that the gas can be integrated into the Utility System Operator's system at the point(s) of receipt and shall conform to the following minimum specifications at the time of delivery:							
	a. <u>Heating Valu</u> (gross) per s thousand one	ie: The min tandard cub hundred fif	imum heat lic feet on a ity (1150) B	ing value is nine a dry basis. The tu (gross) per star	hundred and ni maximum heatin ndard cubic foot	nety (990) Btu g value is one on a dry basis.		
	 Moisture Content or Water Content: For gas delivered at or below a pressure of eight hundred (800) psig, the gas shall have a water content not in excess of seven (7) pounds per million standard cubic feet. For gas delivered at a pressure exceeding eight hundred (800) psig, the gas shall have a water dew point not exceeding 20 degrees F at delivery pressure. 							
	c. <u>Hydrogen Su</u> (0.25) of one hundred (100 hydrogen sul	<u>ilfide</u> : The (1) grain of) standard o fide treatme	gas shall f hydrogen cubic feet (4 nt chemical	not contain mon sulfide, measured 4 ppm). The gas (solvent) or its by	e than twenty-fi d as hydrogen s shall not contain y-products in the	/e hundredths ulfide, per one any entrained gas steam. L		
		-	(Continue	d)		the second second second second		
12C27		-	Issued by	1.	Date Filed	Jan 22, 2008		
Advice Ltr. No.	1745-G	L	ee Schav	FIEN	Effective	Apr 1, 2009		
Decision No.	D.07-12-019	F	Regulatory A	fairs	Resolution No.			

San Diarro Con	Lestin Compositi	_Original Cal. F	P.U.C. Sheet No.	16814-0					
San Diego Gas (San Dieg	o, California	Canceling Cal. F	P.U.C. Sheet No.						
		RULE 30		Sheet 13					
	TRANS	PORTATION OF CUSTOMER	-OWNED GAS						
l. <u>Gas De</u>	livery Specifications	(Continued)							
	d. <u>Mercaptan</u> mercaptan	<u>Mercaptan Sulfur</u> : The gas shall not contain more than three tenths (0.3) grains of mercaptan sulfur, measured as sulfur, per hundred standard cubic feet (5 ppm).							
	e. <u>Total Sulfur</u> : The gas shall not contain more than seventy-five hundredths (0.75) a grain of total sulfur compounds, measured as sulfur, per one hundred (10 standard cubic feet (12.6 ppm). This includes COS and CS ₂ , hydrogen sulfid mercaptans and mono, di and poly sulfides.								
	f. <u>Carbon Dio</u> three perce	<u>Carbon Dioxide</u> : The gas shall not have a total carbon dioxide content in excess of three percent (3%) by volume.							
	f two-tenths of one nable effort to keep								
	h. <u>Inerts</u> : The combined ovolume.	<u>Inerts</u> : The gas shall not contain in excess of four percent (4%) total inerts (the total combined carbon dioxide, nitrogen, oxygen and any other inert compound) by volume.							
I. <u>Hydrocarbons</u> : For gas delivered at a pressure of 800 psig or below hydrocarbon dew point is not to exceed 45 degrees F at 400 psig or at the pressure if the delivery pressure is below 400 psig. For gas delivered at a above 800 psig the gas hydrocarbon dew point is not to exceed 20 d measured at a pressure of 400 psig.									
	j. <u>Merchantab</u> substances	<u>ility</u> : The gas shall not co Injurious to utility facilities or th	ntain dust, sand, dirt, nat would cause gas to l	gums and other be unmarketable.					
	k. <u>Hazardous</u> but not limi concentration injurious to to utility emp	<u>Substances</u> : The gas must no ted to toxic and/or carcinogen ons which would prevent or pipeline facilities, or which wo ployees and/or the general put	t contain hazardous sul lic substances and/or restrict the normal ma uld present a health ar plic.	bstances (including eproductive toxins) rketing of gas, be nd/or safety hazard					
	I. <u>Delivery Te</u> F or above	<u>Delivery Temperature</u> : The gas delivery temperature is not to be below 50 degrees F or above 105 degrees F.							
	m. <u>Interchange</u> not have a American C interchange gas in the u	Interchangeability: The gas shall have a minimum Wobbe Number of 1279 and shall not have a maximum Wobbe Number greater than 1385. The gas shall meet American Gas Association's Lifting Index, Flashback Index and Yellow Tip Index Interchangeability indicies for high methane gas relative to a typical composition of gas in the utility system serving the area. Acceptable specification ranges are:							
	* Lifti IL <u><</u>	ng Index (^I L) <u>:</u> 1.06							
	* Fla: IF <u>-</u>	shback Index (^I F) <u><</u> 1.2							
12004		(Continued)							
13624	1745-0	Issued by	Date Filed	Jan 22, 20					
Advice I tr No.	U 707U3		CUACINA	ADE 1. 20					