

**STATEMENT OF BASIS
Title V Permit Renewal**

Facility Name: CalPeak Power – Border, LLC
Title V App. Number: APCD2020-APP-006509
Title V Permit Number: APCD2008-TVP-978586
Facility ID: APCD2001-SITE-04211
Equipment Address: 2060 Sanyo Avenue, San Diego, CA 92154
Facility Contact: Claude Couvillion - Plant Manager
Contact Phone: (312) 766-8716
Permit Engineer: Camqui Nguyen
Date:

X

Nicholas Horres
Senior Engineer

Senior Engineer:

1.0 Type of Action and Summary of Changes

This application was submitted to renew Title V Permit APCD2008-TVP-978586.

2.0 History of Title V Applications and Modifications/Applications since previous Renewal:

The renewal application was received on 11/4/2020. This renewal application was submitted at least 12 months but not more than 18 months prior to permit expiration, in accordance with Rule 1410. Therefore, the renewal application is timely.

The following table summarizes all previous applications at this facility affecting the Title V permit.

Title V Application History Since Initial Title V Permit				
Application Number	Title V Permit Number	Application Description	Equipment	Outcome
APCD2002-APP-978586	APCD2008-TVP-978586	Initial Title V permit application	Combustion turbine	Approved
APCD2007-APP-985718	APCD2008-TVP-978586	Change contact name	Combustion turbines	Approved
APCD2008-APP-986964	APCD2008-TVP-978586	Change responsible official.	Combustion turbines	Approved
APCD2009-APP-987667	APCD2008-TVP-978586	Permit Renewal	Combustion turbines	Approved
APCD2013-APP-002516	APCD2008-TVP-978586	Change responsible official	Combustion turbines	Approved
APCD2013-APP-003230	APCD2008-TVP-978586	Change responsible official	Combustion turbines	Approved
APCD2015-APP-004069	APCD2008-TVP-978586	Permit Renewal	Combustion turbines	Approved
APCD2015-APP-004209	APCD2008-TVP-978586	Change responsible official	Combustion turbines	Approved
APCD2018-APP-005328	APCD2008-TVP-978586	Change responsible official	Combustion turbine	Approved
APCD2018-APP-005384	APCD2008-TVP-978586	Change responsible official	Combustion turbine	Approved
APCD2019-APP-006002	APCD2008-TVP-978586	Change responsible official	Combustion turbine	Pending
APCD2020-APP-006509	APCD2008-TVP-978586	Permit renewal (this application)	Combustion turbine	Pending

3.0 Facility Description

This facility operates equipment for electric power generation and associated services.

Permit Number	Equipment Description
APCD2008-PTO-976502	GAS TURBINE (49.5 MW): PRATT & WHITNEY, MODEL FT-8 (DLN), TWIN-PAC (TWO SIMPLE CYCLE GAS TURBINES WITH COMMON GENERATOR AND EXHAUST), 500 MM BTU/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.
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4.0 Title V Applicability & Acid Rain

The Title V regulation applies to any stationary source that is a major stationary source as defined in Rule 1401(c)(26) or is subject to the acid rain provisions of Title IV of the federal Clean Air Act (CAA). CalPeak Power Border LLC is a major source for NOx and CO. 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.

5.0 Potential to Emit and Actual Emissions

The following table shows the actual and potential emissions for the facility that are used to establish the major source status for Title V. For all pollutants, emissions are below major source thresholds.

Title V Major Source Determination Tons per Year:				
Pollutant	Thresholds	Facility Actual Emissions	Facility Potential to Emit	Major Source
Highest Federal HAP	10	0.03		
Sum of Federal HAPs	25	0.08		
NOx	25	1.60	31.6	Yes
VOC	25	1.28		
PM10	100	0.10	14.52	No
SOx	100	0.07	7.48	No
CO	100	2.70	100	Yes

Facility actual emissions are based on Emission Inventory report for 2021. NOx and CO potential emissions are based on permit condition limits. SOx and PM10 potential emissions are from emission calculation for Application 976502.

6.0 40 CFR Part 64 CAM (Compliance Assurance Monitoring)

Pursuant to New Source Review (NSR) the turbines are required to operate and maintain the CEMS to measure NOx and CO, which is also required by District Rules 69.3.1, and 40 CFR 60 Subpart KKKK. 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 Applicable Requirements

This section summarizes the major types of requirements for this facility. These types of requirements include facility-wide, and permit specific applicable requirements. Additionally, for each emission unit, the rule that results in the primary emission limitation is listed.

General Permit Program Applicable Requirements

Regulation	Rule Citation	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 , 20.3	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 & Misc. Requirements

Regulation	Rule Citation	Title
SDCAPCD Reg. II	19.2	Continuous Emission Monitoring Systems
SDCAPCD Reg. IV	50	Visible Emissions
SDCAPCD Reg. IV	51	Nuisance
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. IV	71	Abrasive Blasting
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 72	Part 72	Acid Rain
40 CFR Part 73	Part 73	Sulfur Dioxide Allowance System

* 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.	Title V Permit No.	Permit Description	Applicable Rules
APCD2008-PTO-976502	APCD2008-TVP-978586	GAS TURBINE (49.5 MW): PRATT & WHITNEY, MODEL FT-8 (DLN), TWIN-PAC (TWO SIMPLE CYCLE GAS TURBINES WITH COMMON GENERATOR AND EXHAUST), 500 MM BTU/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.	50 51 53 68 69.3.1 20.3 1200 40 CFR-Part 60_Subpart GG

Emission Limitations

Combustion Turbines	
Pollutant	Primary Limiting Regulations*
NOx	20.3
SO2	53, 62
VOC	20.3
CO	20.3
PM10	20.3
Toxic Pollutants	1200

The permit emission limits for NOx, CO, VOC, PM10 for the combustion turbines reflect BACT requirements that the combustion turbines must meet to comply with Rule 20.3 of New Source Review. Rule 69.3.1 was revised on 12/9/2021. However, none of the requirements applicable to this permit renewal were changed.

8.0 Updates to the Title V Permit Incorporated into this Action

Asides from administrative changes to contact information, there are updates to the Applicable Requirements and updates to the Rule Adoption dates and Rule SIP approval dates to this permit renewal.

9.0 Multiple Applicable Requirement Streamlining

The applicant does not request any multiple applicable requirement streamlining for this renewal application.

Permit conditions do incorporate some streamlining to improve readability and reduce confusion between similar requirements. Fuel sulfur limits and recordkeeping requirements of NSPS GG and District Rule 62 have been streamlined into a single condition for each gas turbine.

Streamlining is not done for NOx emission limits, since there are NOx emission limits for Rule 20.3 and Rule 69.3.1 that do not apply during startups and shutdowns, and there is NOx emission limit from NSPS Subpart GG that applies at all times, including startups and shutdowns.

10. 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.

The permittee is granted a permit shield from enforcement action for the rules cited in the table below based on the District’s determination that such rules are not applicable to any operation at this facility.

Regulation	Rule Citation	Title
SDAPCD Reg. IV	52	Particulate matter
SDAPCD Reg. IV	54	Dust and Fumes
SDAPCD Reg. VIII	132	Traffic Abatement Plan

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 and affected states and a public notice period. Notice will be provided to the EPA electronically through the EPS and will be sent electronically to affected states and tribes. The public notice and associated documents will be provided on our website and the public notice

will be published in a newspaper. The District will incorporate any suggested changes made by EPA.

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 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 Permit
- Public Notice

