

Goal Line, L.P.

July 28, 2021

Via email to: [Nick.Horres@sdcounty.ca.gov](mailto:Nick.Horres@sdcounty.ca.gov)

Mr. Nicholas Horres  
Senior Air Pollution Engineer  
County of San Diego - Air Pollution Control District  
10124 Old Grove Road  
San Diego, CA 92131

Subject: Renewal of Title V and Acid Rain Permits for the Goal Line, L.P. Facility  
Site Number: APCD1992-SITE-08447  
Affected Permit IDs:  
Title V Record ID: APCD2016-TVP-00043  
PTO Record IDs: APCD2001-PTO-911504 and APCD1999-PTO-960443

Dear Nick:

On behalf of Onward Energy, Goal Line, L.P. is submitting applications to the San Diego Air Pollution Control District (the District) for the renewal of two permits issued to the Goal Line Facility. The package addresses the current Title V permit, which is scheduled to expire on October 26, 2022, as well as the Acid Rain permit issued for the Combined Cycle Cogeneration Gas Turbine (APCD2001-PTO-911504).

As discussed with the District, effective January 1, 2021, Southwest Generation the asset owners of the Goal Line Facility merged with Novatus Energy to become Onward Energy ([www.OnwardEnergy.com](http://www.OnwardEnergy.com)). The owner/operator structure of Goal Line has not changed, except for new email addresses.

During the course of the current Title V permit, the Goal Line Facility has not applied for any administrative amendments or modifications to the Title V permit, nor has the facility made any major changes or modifications that may have resulted in any increases to permitted emission rates, hours of operations, or method of operations.

Attached with the transmittal are the required forms for renewal of the Title V permit as well as the Acid Rain permit. Please let me know if any additional information is needed.

We are looking forward to working with you to help expedite the District's Completeness review for the Title V and Acid Rain permits, as well as address any regulatory or technical questions that may emerge during your review.

With your assistance, we have estimated the fee for this renewal in the amount of \$8,354.00. A copy of this check is included as an attachment. The check itself has been sent by OnwardEnergy's corporate office directly to the San Diego Air Pollution Control District with a cover letter that references this permit application.

As the Responsible Official for this facility, I have reviewed the information presented for this renewal and attest to its accuracy. Please contact me at 619-344-0538 if you have any questions.

Regards,

**Jason W. King** Digitally signed by Jason W. King  
Date: 2021.07.28 07:50:52 -07'00'

**Jason King**  
Plant Manager  
Goal Line, L.P. and Pio Pico Energy Center, LLC  
(619) 344-0538 Office  
[Jason.King@OnwardEnergy.com](mailto:Jason.King@OnwardEnergy.com)  
[www.onwardenergy.com](http://www.onwardenergy.com)

**Attachments:**

Title V Forms

- General Permit of Registration Form
- Application Fee Estimate Sheet
  - Copy of Check # 012067, for \$8,354.00
- Form 1401-A1: Stationary Source Summary (page 1)
  - Vicinity Map (no schools within 1,000 feet)
- Form 1401-A2: Stationary Source Summary (page 2)
  - Facility Emissions Summary and Calculations
- Form 1401-G: List of Equipment – Insignificant Activities
- Form 1401-H1: Applicable Requirements Summary Checklist
- Form 1401-H2: Permitted by Equipment Category
- Form 1401-I: Certification Statement
- Form 1401-K: Compliance Certification Schedule
- Form 1401-L: Schedule of Compliance
  - Settlement Offer regarding NOV Number APCD20121-NOV-000150
- Form 1401-M: Abatement Devices
- Form 1401-N: Alternative Operating Scenario
- Form 1401-O: Multiple Applicable Requirements Streamlining
  - Compliance Plan Streamlining Analysis
- Form 1401-Q: Permit Shield

Acid Rain Form

- OMB No. 2060-0258 (approval expires 12/31/2021)

Copy: Ian Fudalski, Manager, Environmental Compliance  
Onward Energy  
(303) 623-2908  
[Ian.Fudalski@OnwardEnergy.com](mailto:Ian.Fudalski@OnwardEnergy.com)



Goal Line, L.P.

July 19, 2021

Copy via email to: [Nick.Horres@sdcounty.ca.gov](mailto:Nick.Horres@sdcounty.ca.gov)

County of San Diego - Air Pollution Control District  
10124 Old Grove Road  
San Diego, CA 92131

Subject: Check # 012067 for Renewal of Title V and Acid Rain Permits for the Goal Line, L.P.  
Facility - Site Number: APCD1992-SITE-08447  
Affected Permit IDs:  
Title V Record ID: APCD2016-TVP-00043  
PTO Record IDs: APCD2001-PTO-911504 and APCD1999-PTO-960443

The enclosed check for the amount of \$8,354 is provided as payment of the estimated fee for the renewal of the Title V and Acid Rain permits issued to the Goal Line, L.P. facility.

The complete permit package has been submitted to the APCD in electronic form addressed to Nicholas Horres, Senior Air Pollution Control Engineer.

Please contact me at 303-623-2908 if you have any questions regarding this payment.

Regards,

**Ian Fudalsky**

Manager, Environmental Compliance  
OnwardEnergy, Inc  
600 Seventeenth Street, Suite 2400S  
Denver, Colorado 80202

[Ian.Fudalski@OnwardEnergy.com](mailto:Ian.Fudalski@OnwardEnergy.com)  
[www.onwardenergy.com](http://www.onwardenergy.com)

**Attachments:**

- Application Fee Estimate Sheet
- Check # 012067, for \$8,354.00

Internal Use Only
APP ID: APCD 2021 -APP/CER- 006884
SITE ID: APCD 1992 -SITE- 08447

# GENERAL PERMIT OR REGISTRATION APPLICATION FORM



**Submittal of this application does not grant permission to construct or to operate equipment except as specified in Rule 24(c).**

## REASON FOR SUBMITTAL OF APPLICATION:

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> New Installation  | <input type="checkbox"/> Existing Unpermitted Equipment or Rule 11 Change                           | <input type="checkbox"/> Modification of Existing Permitted Equipment                      |
| <input type="checkbox"/> Amendment to Existing Authority to Construct or Application | <input type="checkbox"/> Change of Equipment Location   | <input type="checkbox"/> Change of Equipment Ownership (please provide proof of ownership) |
| <input type="checkbox"/> Change of Permit Conditions                                 | <input type="checkbox"/> Change Permit to Operate Status to Inactive                                | <input type="checkbox"/> Banking Emissions   |
| <input type="checkbox"/> Registration of Portable Equipment                          | <input checked="" type="checkbox"/> Other (Specify) <u>Renewal of Title V and Acid Rain Permits</u> |  |

List affected APP/PTO Record ID(s): APCD2001-PTO-911504 APCD1999-PTO-960443 APCD2016-TVP-00043

## APPLICANT INFORMATION

Name of Business (DBA) Goal Line, L.P.

Does this organization own or operate any other APCD permitted equipment at this or any other adjacent locations? ☐ Yes ☒ No

If yes, list assigned Site Record IDs listed on your Permits N/A

Name of Legal Owner (if different from DBA) N/A

### Equipment Owner

### Authority to Construct Mailing Address

Name: <u>Goal Line, L.P.</u>	Name: <u>SAME</u>
Mailing Address: <u>555 N. Tulip Street</u>	Mailing Address:
City: <u>Excondido</u> State: <u>CA</u> Zip: <u>92025</u>	City: State: Zip:
Phone: <u>(619) 344-0538</u>	Phone: ( )
E-Mail Address: <u>Jason.King@OnwardEnergy.com</u>	E-Mail Address:

### Permit To Operate Mailing Address

### Invoice Mailing Address

Name: <u>SAME</u>	Name: <u>SAME</u>
Mailing Address:	Mailing Address:
City: State: Zip:	City: State: Zip:
Phone: ( )	Phone: ( )
E-Mail Address:	E-Mail Address:

**EQUIPMENT/PROCESS INFORMATION:** Type of Equipment: ☒ Stationary ☐ Portable, *if portable please enter below the equipment storage address.* If portable, will operation exceed 12 consecutive months at the same location ☐ Yes ☐ No

Equipment Location Address City State:

Parcel No. Zip Phone ( ) E-mail:

Site Contact Phone ( )

General Description of Equipment/Process 49.8 MW combined cycle combustion turbine plant with auxiliary boiler

Application Submitted by ☐ Owner ☒ Operator ☐ Contractor ☐ Consultant Affiliation

**EXPEDITED APPLICATION PROCESSING:** ☐ I hereby request Expedited Application Processing and understand that:

a) Expedited processing will incur additional fees and permits will not be issued until the additional fees are paid in full (see Rule 40(d)(8)(iv) for details) b) Expedited processing is contingent on the availability of qualified staff c) Once engineering review has begun this request cannot be cancelled d) Expedited processing does not guarantee action by any specific date nor does it guarantee permit approval.

☐ **This application contains trade secret or confidential information (see reverse for instructions)**

**I hereby certify that all information provided on this application is true and correct.**

SIGNATURE Jason W. King Digitally signed by Jason W. King Date July 19, 2021  
Print Name Jason King Date: 2021.07.28 07:52:39 -07'00' Company Goal Line, L.P.  
Phone (619) 344-0538 E-mail Address Jason.King@OnwardEnergy.com

### Internal Use Only

Date <u>07/30/2021</u>	Staff Initials: <u>CM</u>	Amt Rec'd \$ <u>8354</u>	Fee Schedule <u>TIV ETM</u>
RNP:	EMF:	NBF:	TA:

GEN\_APP\_Form\_Rev Date: Aug. 2017

10124 Old Grove Rd. – San Diego - California 92131-1649 – (858) 586-2600

www.sdapcd.org

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

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

<b>Company Name</b> <u>Goal Line, L.P.</u>	<b>District Use Only</b> <b>NEDS #</b> _____ <b>SITE ID #</b> _____
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**I. FACILITY IDENTIFICATION**

1. Facility Name (if different than company name): Goal Line
2. Four digit SIC Code: 4911
3. Parent Company (if different than Company Name): Onward Energy
4. Mailing Address: 600 Seventeenth Street, Suite 2400S  
 City Denver State Colorado Zip 80202
5. Street Address or Source Location: 555 North Tulip Street  
 City Escondido State CA Zip 92025
6. UTM Coordinates: E490737 and N3664441 Zone 11
7. Source Located within 50 miles of a state line: ☒ Yes ☐ No (All sources **are** within 50 miles)
8. Source Located within 1000 feet of a school: ☐ Yes ☒ No (See attached map)
9. Type of Organization: ☐ Corporation ☐ Sole Ownership ☐ Government  
☒ Partnership ☐ Utility Company
10. Legal Owner's Name: Goal Line, L.P.
11. Owner's Agent name (if any): \_\_\_\_\_
12. Responsible Official: Jason King
13. Plant Site Manager/Contact: Jason King Phone #: (619) 344-0538 FAX #: \_\_\_\_\_
14. Application Contact: Ian Fudalski
15. Type of Facility: Stationary Electric Power and Steam Generation
16. General description of processes/products: Combustion Turbin and Steam Boiler for Electric Power Generation
17. Is a Federal Risk Management Plan (RMP) pursuant to Section 112(r) required? ☒ Yes ☐ No  
 (If application is submitted after RMP due date, attach verification that plan is registered with the appropriate agency.)  
 see UPFP Number DEH2002-HUPFR-134233

II. TYPE OF PERMIT ACTION (check)	CURRENT PERMIT (permit number)	EXPIRATION (date)
<input type="checkbox"/> Initial Title V Application	N/A	N/A
<input checked="" type="checkbox"/> Permit Renewal	APCD2016-TVP-00043	October 26, 2022
<input type="checkbox"/> Significant Permit Modification		
<input type="checkbox"/> Minor Permit Modification		
<input type="checkbox"/> Administrative Amendment		

**III. DESCRIPTION OF PERMIT ACTION**

1. Does the permit action requested involve:
 

<input checked="" type="checkbox"/> Acid Rain Source	<input type="checkbox"/> Temporary Source	<input type="checkbox"/> Voluntary Emissions Caps
<input type="checkbox"/> CEMs	<input type="checkbox"/> Alternative Operating Scenarios	<input type="checkbox"/> Abatement Devices
<input type="checkbox"/> Outdated SIP Requirement Streamlining	<input checked="" type="checkbox"/> Permit Shield	
<input type="checkbox"/> Source Subject to MACT Requirements [Section 112]	<input type="checkbox"/> Multiple Applicable Requirement Streamlining	
<input type="checkbox"/> Source Subject to Enhanced Monitoring (40CFR64) [Compliance Assurance Monitoring]		
2. Is source operating under a Compliance Schedule? ☐ Yes ☒ No ☐ Proposed
3. Is source operating under a Variance ☐ Yes ☒ No (If Yes, please attach variance information)
4. For permit modification, provide a general description of the proposed permit modification:  
N/A

**IV. SUPPLEMENTAL ATTACHMENTS\*:** See Table of Forms attached to transmittal letter.

\* 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)**

<b>Company Name</b> <u>Goal Line, L.P.</u>	<b>District Use Only</b> NEDS # _____ SITE ID # _____
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**I. MAJOR SOURCE APPLICABILITY**

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

POLLUTANT	MAJOR SOURCE THRESHOLD TOTAL EMISSIONS, TPY	(check if appropriate)
VOC	100	<input type="checkbox"/>
PM <sub>10</sub>	100	<input type="checkbox"/>
SO <sub>2</sub>	100	<input type="checkbox"/>
NO <sub>x</sub>	100	<input type="checkbox"/>
CO	100	<input type="checkbox"/>
ODC	100	<input type="checkbox"/>
LEAD COMPOUNDS	10	<input type="checkbox"/>
<b>HAZARDOUS AIR POLLUTANTS</b>		
SINGLE HAP	10	<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
COMBINATION HAP	25	<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

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 2016 Application  
**Jason W. King** Digitally signed by Jason W. King  
Date: 2021.07.28 07:53:31 -07'00'  
Signature of Responsible Official

Inventory Year 2020  
July 19, 2021  
Date

Jason King  
Print Name of Responsible Official  
Plant Manager  
Title of Responsible Official

(619) 344-0538  
Telephone No. of Responsible Official

**II. EMISSIONS CALCULATIONS ATTACHED (as needed)**

☐ Yes ☒ No

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**DISTRICT USE ONLY**

Date Application Received: \_\_\_\_\_ Application # \_\_\_\_\_  
Application Filing Fee: \_\_\_\_\_ District Received Stamp: \_\_\_\_\_  
Receipt #: \_\_\_\_\_ Fee Code: \_\_\_\_\_



# Goal Line, L.P.

Aerial map showing no schools within 1,000 ft radius of the Plant

## Legend

Goal Line, L.P.



1,000 ft  
Radius



**GOAL LINE L.P.  
GOAL LINE COGENERATION FACILITY**

**MAXIMUM EMISSIONS - GAS TURBINE**

Parameter	
Generator Power Output (MW)	42.4
Heat Input Rate (MMBtu/hr @ HHV)	405
Higher Heating Value (Btu/scf)	1,020
Fuel Sulfur Content (gr/100 scf)	0.75
F-Factor (dscf/MMBtu @ 0% O2)	8,710
F-Factor (dscf CO2/MMBtu)	1,040
Standard Temperature (deg F)	68
Exhaust CO2	

Device	Gas Turbine
Make	General Electric
Model	LM6000
Fuel	Natural Gas
Daily SU/SD Hours	2
Daily Operating Hours	24
Annual Operating Days	365
Annual Operating Hours	8200

Pollutant	Exhaust Concentration (ppmvd @ 15% O2)	Emission Factor (lb/MMBtu)	Maximum Emissions				
			SU/SD (lb/hr)	Hourly (lb/hr)	Daily (lb/day)	Annual (lb/yr)	Annual (tpy)
CO	25.0	0.056	N/A	22.7	544	185,998	93.0
NOx	5.0	0.018	25.0	7.45	214	61,114	30.6
PM10 ---> gr/dscf @ 12% CO2	0.005	0.0066	N/A	2.67	64.1	21,908	11.0
PM2.5 ---> gr/dscf @ 12% CO2	0.005	0.0066	N/A	2.67	64.1	21,908	11.0
SOx	0.4	0.0021	N/A	0.85	20.4	6,973	3.49
VOC (as CH4)	1.6	0.0021	N/A	0.85	20.4	6,971	3.49

Notes

Generator power output (in MW) and heat input rate (in MMBtu/hr) were obtained from the PTO.

Higher heating value (HHV, in Btu/scf) and fuel sulfur content (in gr/100 scf NG) reflects typical values for Southern California natural gas.

F-Factors (in scf/MMBtu) and standard temperature (in degrees F) were obtained from Method 19 of Appendix A to 40 CFR Part 60

CO and NOx exhaust gas concentrations (in ppmvd @ 15% O2) were obtained from the PTO. Hourly emissions (in lb/hr) were calculated from the exhaust concentrations (in ppmvd @ 15% O2), heat input rate (in MMBtu/hr), dry F-Factor (in scf/MMBtu @ 0% O2), and reference O2 concentration (15%). Emission rates (in lb/MMBtu) were calculated from the hourly emissions (in lb/hr) and the heat input rate (in MMBtu/hr).

PM10 and VOC emission rates (in lb/MMBtu) were obtained from Table 3.1-2a of AP-42 (April 2000). PM10 was assumed to comprise 100% PM2.5. SOx emission rate (in lb/MMBtu) was calculated from the fuel sulfur content limit, higher heating value (in Btu/scf), and heat input rate (in MMBtu/hr). Hourly emissions (in lb/hr) were calculated from the emission rate (in lb/MMBtu) and the heat input rate (in MMBtu/hr). Exhaust gas concentrations (in ppmvd @ 15% O2) were calculated from the hourly emission rate (in lb/hr), heat input rate (in MMBtu/hr), dry F-Factor (in scf/MMBtu @ 0% O2), and reference O2 concentration (15%).

Maximum daily SU/SD hours were assumed to be 2 hr/day. NOx SU/SD emission rate was obtained from the PTO.

Daily NOx emissions (in lb/day) were calculated from the SU/SD emission rate (in lb/hr) at 2 hr/day and the hourly emission rate (in lb/hr) at 22 hr/day. Daily emissions for the other pollutants were calculated from the hourly emission rate (in lb/hr) at 24 hr/day

Annual emissions (in tpy) were calculated from the daily emission (in lb/day) and the annual operating days.



**GOAL LINE L.P.  
GOAL LINE COGENERATION FACILITY**

**MAXIMUM EMISSIONS - AUXILIARY BOILER**

Parameter		Device	
Heat Input Rate (MMBtu/hr @ HHV)	14.6	Make	Boiler
Higher Heating Value (Btu/scf)	1,020	Model	Sellers Engineering
F-Factor (dscf/MMBtu @ 0% O2)	8,710	Fuel	350HP-SH-LN390
F-Factor (dscf CO2/MMBtu)	1,040	Daily Operating Hours	Natural Gas
Standard Temperature (deg F)	68	Annual Operating Days	24
		Annual Operating Hours	365
			560

  

Pollutant	Exhaust Concentration (ppmvd @ 3% O2)	Emission Factor (lb/MMBtu)				
			Hourly (lb/hr)	Daily (lb/day)	Annual (lb/yr)	Annual (tpy)
CO	400	0.296	4.31	104	2,416	1.2
NOx	30.0	0.036	0.53	12.8	4,657	2.33
PM10 ---> gr/dscf @ 12% CO2	0.006	0.0075	0.11	2.61	953	0.48
PM2.5 ---> gr/dscf @ 12% CO2	0.006	0.0075	0.11	2.61	953	0.48
SOx	0.3	0.00059	0.009	0.21	75	0.04
VOC (as CH4)	12.8	0.0054	0.08	1.89	690	0.34

Notes

Heat input rate (in MMBtu/hr) were obtained from the PTO.

Higher heating value (HHV, in Btu/scf) was obtained from Table 1.4-2 of AP-42 (July 1998).

F-Factors (in scf/MMBtu) and standard temperature (in degrees F) were obtained from Method 19 of Appendix A to 40 CFR Part 60

CO and NOx exhaust gas concentrations (in ppmvd @ 3% O2) were obtained from the PTO. Hourly emissions (in lb/hr) were calculated from the exhaust concentrations (in ppmvd @ 3% O2), heat input rate (in MMBtu/hr), dry F-Factor (in scf/MMBtu @ 0% O2), and reference O2 concentration (3%). Emission rates (in lb/MMBtu) were calculated from the hourly emissions (in lb/hr) and the heat input rate (in MMBtu/hr).

PM10, SOx, and VOC emission rates (in lb/MMBtu) were obtained from Table 1.4-2 of AP-42 (July 1998). PM10 was assumed to comprise 100% PM2.5. Hourly emissions (in lb/hr) were calculated from the emission rate (in lb/MMBtu) and the heat input rate (in MMBtu/hr)

Exhaust gas concentrations (in ppmvd @ 3% O2) were calculated from the hourly emission rate (in lb/hr), heat input rate (in MMBtu/hr), dry F-Factor (in scf/MMBtu @ 0% O2), and reference O2 concentration (3%).

Daily emissions were calculated from the hourly emission rate (in lb/hr) at 24 hr/day

Annual emissions (in tpy) were calculated from the daily emission (in lb/day) and the annual operating days.

**GOAL LINE L.P.  
GOAL LINE COGENERATION FACILITY**

**MAXIMUM POTENTIAL EMISSIONS -- EXISTING FACILITY**

Pollutant	Maximum PTE (tpy)		
	Gas Turbine	Aux Boiler	Totals
CO	93.0	1.2	93.0
NOx	30.6	2.3	30.6
PM10	11.0	0.5	11.0
PM2.5	11.0	0.5	11.0
SOx	3.49	0.04	3.5
VOC	3.49	0.34	3.5

Notes

Facility-wide totals do not reflect contributions from the auxiliary boiler since the auxiliary boiler does not operate simultaneously with the gas turbine.



**GOAL LINE L.P.  
GOAL LINE COGENERATION FACILITY**

**MAXIMUM TAC EMISSIONS - AUXILIARY BOILER**

Parameter	
Device	Auxiliary Boiler
Make	Sellers Engineering
Model	350HP-SH-LN390
Fuel	Natural Gas
Heat Input Rate (MMBtu/hr @ HHV)	14.6
HHV (Btu/scf)	1,020
Fuel Consumption Rate (mmscfh)	0.014
Annual Operating Hours	8,760
Annual Fuel Consumption (mmscf/yr)	125

Pollutant	Emission Factor		Maximum Emissions	
	(lb/mmcf)	Source	Hourly (lb/hr)	Annual (lb/yr)
Acetaldehyde	8.87E-03	CATEF	1.27E-04	1.11
Acrolein	2.70E-03	Ventura	3.86E-05	0.34
Benzaldehyde	1.64E-02	CATEF	2.35E-04	2.06
Benzene	4.31E-03	CATEF	6.17E-05	0.54
Ethylbenzene	9.50E-03	Ventura	1.36E-04	1.19
Formaldehyde	2.21E-01	CATEF	3.16E-03	27.7
Hexane	6.30E-03	Ventura	9.02E-05	0.79
Naphthalene	3.00E-04	Ventura	4.29E-06	0.04
Other PAHs	1.00E-04	Ventura	1.43E-06	0.01
Propylene	7.31E-01	Ventura	1.05E-02	91.7
Toluene	3.66E-02	Ventura	5.24E-04	4.59
Xylenes	2.72E-02	Ventura	3.89E-04	3.41
<b>TOTAL HAPS</b>				<b>41.8</b>

Notes

Heat input rate (in MMBtu/hr) was obtained from the PTO.

Higher heating value (HHV, in Btu/scf) reflects the default value in Tables 1.4-1 and 1.4-2 of AP-42.

Fuel consumption rate (in scfh) was calculated from the heat input rate (in MMBtu/hr) and the HHV.

Annual fuel consumption (in mmcf/yr) was calculated from the hourly fuel consumption rate (in scfh) and the annual operating hours.

Emission factors (in lb/mmcf) were obtained from CARB's CATEF database for natural gas-fired boilers and from Ventura County APCD's air toxics emission factor database for external combustion. Hourly emissions (in lb/hr) were calculated from the emission factor (in lb/mmcf) and the fuel consumption rate (in scfh).

Annual emissions (in lb/yr) were calculated from the hourly emission (in lb/hr) and the annual operating hours.

Total HAP emissions (in lb/yr) exclude propylene, which are not federal HAPs.

**GOAL LINE L.P.  
GOAL LINE COGENERATION FACILITY**

**MAXIMUM POTENTIAL TAC EMISSIONS - FACILITY**

Pollutant	Maximum PTE (lb/yr)		
	Gas Turbine	Auxiliary Boiler	Facility
Acetaldehyde	476	1.11	476
Acrolein	65.7	0.34	66
Ammonia	48,256		48,256
Benzaldehyde		2.06	0.00
Benzene	46.2	0.54	46.2
1,3-Butadiene	0.44		0.44
Ethylbenzene	62.2	1.19	62.2
Formaldehyde	3,188	27.7	3,188
Hexane	900	0.79	900
Naphthalene	5.77	0.04	5.77
Other PAHs	0	0.01	0.00
Acenaphthene	0.07		0.07
Acenaphthylene	0.05		0.05
Anthracene	0.12		0.12
Benzo(a)anthracene	0.08		0.08
Benzo(b)fluoranthene	0.04		0.04
Benzo(k)fluoranthene	0.04		0.04
Benzo(g,h,i)perylene	0.05		0.05
Benzo(a)pyrene	0.05		0.05
Benzo(e)pyrene	0.002		0.002
2-Chloronaphthalene	0.0009		0.0009
Chrysene	0.09		0.09
Dibenz(a,h)anthracene	0.08		0.08
Fluoranthene	0.15		0.15
Fluorene	0.20		0.20
Indeno(1,2,3-cd)pyrene	0.08		0.08
2-Methylnaphthalene	0.02		0.02
Perylene	0.002		0.002
Phenanthrene	1.09		1.09
Pyrene	0.10		0.10
Propylene	2,680	91.7	2,680
Propylene Oxide	166		166
Toluene	247	4.59	247
Xylenes	91	3.41	90.7
<b>MAXMIMUM HAP -- Formaldehyde</b>			3,188
<b>MAXMIMUM HAP (tpy)</b>			1.59
<b>TOTAL HAPS</b>			5,251
<b>TOTAL HAPS (tpy)</b>			2.63

Notes

Facility-wide totals do not reflect contributions from the auxiliary boiler since the auxiliary boiler does not operate simultaneously with the gas turbine.



**GOAL LINE L.P.  
GOAL LINE COGENERATION FACILITY**

**MAXIMUM POTENTIAL GHG EMISSIONS**

Parameter	Gas Turbine	Auxiliary Boiler	Facility
Annual Heat Input (MMBtu/yr)	3,546,048	127,896	N/A
CO2 Emission Factor (kg/MMBtu)	53.02	53.02	N/A
CH4 Emission Factor (kg/MMBtu)	1.0E-03	1.0E-03	N/A
N2O Emission Factor (kg/MMBtu)	1.0E-04	1.0E-04	N/A
CO2 GWP	1	1	N/A
CH4 GWP	21	21	N/A
N2O GWP	310	310	N/A

Pollutant	Annual PTE (tpy)		
	Gas Turbine	Auxiliary Boiler	Facility
CO2	207,289	7,476	207,289
CH4	3.91	0.14	3.91
N2O	0.39	0.01	0.39
CO2 (CO2e)	207,289	7,476	207,289
CH4 (CO2e)	82.1	2.96	82.1
N2O (CO2e)	121	4.4	121
<b>TOTAL CO2e (tpy)</b>	<b>207,493</b>	<b>7,484</b>	<b>207,493</b>

Notes

GHG emission factors were obtained from Tables C-1 and C-2 of Subpart C of Part 98.

Global warming potential (GWP) values were obtained from Table A-1 of Subpart A of Part 98.

Annual GHG emissions (in tpy) were calculated from the annual heat input rate (in MMBtu/yr) and the GHG emission factors (in kg/MMBtu).

Facility-wide totals do not reflect contributions from the auxiliary boiler since the auxiliary boiler does not operate simultaneously with the gas turbine.

**GOAL LINE L.P.**  
**GOAL LINE COGENERATION FACILITY**

**MAXIMUM TAC EMISSIONS - GAS TURBINE**

Parameter	
Device	Gas Turbine
Make	General Electric
Model	LM6000
Fuel	Natural Gas
Heat Input Rate (MMBtu/hr @ HHV)	405
HHV (Btu/scf)	1,020
Fuel Consumption Rate (mmscfh)	0.397
Annual Operating Hours	8,760
Annual Fuel Consumption (mmscf/yr)	3,477
F-Factor (dscf/MMBtu @ 0% O2)	8,710

Pollutant	Emission Factor (lb/mmcf)	Maximum Emissions	
		Hourly (lb/hr)	Annual (lb/yr)
Acetaldehyde	1.37E-01	5.44E-02	476
Acrolein	1.89E-02	7.50E-03	65.7
Ammonia	10.0	5.5	48,256
Benzene	1.33E-02	5.28E-03	46.2
1,3-Butadiene	1.27E-04	5.04E-05	0.44
Ethylbenzene	1.79E-02	7.10E-03	62.2
Formaldehyde	9.17E-01	3.64E-01	3,188
Hexane	2.59E-01	1.03E-01	900
Naphthalene	1.66E-03	6.59E-04	5.77
Other PAHs			
Acenaphthene	1.90E-05	7.54E-06	0.07
Acenaphthylene	1.47E-05	5.83E-06	0.05
Anthracene	3.38E-05	1.34E-05	0.12
Benzo(a)anthracene	2.26E-05	8.97E-06	0.08
Benzo(b)fluoranthene	1.13E-05	4.48E-06	0.04
Benzo(k)fluoranthene	1.10E-05	4.37E-06	0.04
Benzo(g,h,i)perylene	1.37E-05	5.44E-06	0.05
Benzo(a)pyrene	1.39E-05	5.52E-06	0.05
Benzo(e)pyrene	5.44E-07	2.16E-07	0.002
2-Chloronaphthalene	2.72E-07	1.08E-07	0.0009
Chrysene	2.52E-05	1.00E-05	0.09
Dibenz(a,h)anthracene	2.35E-05	9.33E-06	0.08
Fluoranthene	4.32E-05	1.71E-05	0.15
Fluorene	5.80E-05	2.30E-05	0.20
Indeno(1,2,3-cd)pyrene	2.35E-05	9.33E-06	0.08
2-Methylnaphthalene	5.29E-06	2.10E-06	0.02
Perylene	7.00E-07	2.78E-07	0.002
Phenanthrene	3.13E-04	1.24E-04	1.09
Pyrene	2.77E-05	1.10E-05	0.10
Propylene	7.71E-01	3.06E-01	2,680
Propylene Oxide	4.78E-02	1.90E-02	166
Toluene	7.10E-02	2.82E-02	247
Xylenes	2.61E-02	1.04E-02	91
<b>TOTAL HAPS</b>			<b>5,251</b>

Notes

Heat input rate (in MMBtu/hr) was obtained from the PTO.

Higher heating value (HHV, in Btu/scf) reflects the default value in Tables 1.4-1 and 1.4-2 of AP-42.

Fuel consumption rate (in scfh) was calculated from the heat input rate (in MMBtu/hr) and the HHV.

F-Factors (in scf/MMBtu) and standard temperature were obtained from Method 19 of Appendix A to 40 CFR Part 60.

Annual fuel consumption (in mmcf/yr) was calculated from the hourly fuel consumption rate (in scfh) and the annual operating hours.

Emission factors (in lb/mmcf) -- excluding ammonia -- were obtained from CARB's CATEF database for natural gas-fired gas turbines equipped with SCR.

Hourly emissions (in lb/hr) were calculated from the emission factor (in lb/mmcf) and the fuel consumption rate (in scfh).

The ammonia emission limit (in ppmv @ 15% O2) was obtained from the PTO. Hourly emissions (in lb/hr) were calculated from the exhaust

concentration (in ppmvd @ 15% O2), heat input rate (in MMBtu/hr), F-Factor (in scf/MMBtu @0% O2), and reference O2 concentration (15%).

Annual emissions (in lb/yr) were calculated from the hourly emission (in lb/hr) and the annual operating hours.

Total HAP emissions (in lb/yr) exclude ammonia and propylene, which are not federal HAPs.



**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)**

<b>Company Name</b> _____ Goal Line, L.P.	<b>District Use Only</b>  NEDS # _____ SITE ID # _____
Facility Address: 555 North Tulip Street, Escondido, CA 92025	

## 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)

<u>(Condensed Language of Rule)</u>	<u>Appendix A Citation</u>
<input checked="" type="checkbox"/> Stationary & portable internal combustion engines with $\leq 50$ bhp output rating	(d)(1)(iii)
<input type="checkbox"/> 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)
<input type="checkbox"/> 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)
<input type="checkbox"/> 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)
<input type="checkbox"/> 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)
<input type="checkbox"/> Steam boilers, process heaters, and steam generators with a maximum gross heat input of $< 5$ million Btu/hour	(d)(4)(iii)
<input type="checkbox"/> Crucible-type or pot-type furnaces with a brimful capacity of $< 450$ in <sup>3</sup> of any molten metal	(d)(12)
<input type="checkbox"/> Crucible, pot or induction furnaces with a capacity of $\leq 2500$ in <sup>3</sup> , 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)
<input type="checkbox"/> Dry batch mixers with $\leq 0.5$ cubic yards rated working capacity	(d)(27)
<input type="checkbox"/> Batch mixers (wet) with $\leq 1$ cubic yard capacity where no organic solvents, diluents or thinners are used.	(d)(28)
<input type="checkbox"/> Roofing kettles (used to heat asphalt) with a capacity of $\leq 85$ gallons	(d)(33)
<input type="checkbox"/> Abrasive blasting equipment with a manufacturer's-rated sand capacity of $< 100$ lbs or $< 1$ ft <sup>3</sup>	(d)(34)
<input type="checkbox"/> 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)
<input type="checkbox"/> Ovens having an internal volume of $\leq 27$ ft <sup>3</sup> in which organic solvents or materials containing organic solvents are charged	(d)(59)
<input type="checkbox"/> Cold solvent cleaning tanks, vapor degreasers, and paint stripping tanks with a liquid surface area of $\leq 1.0$ ft <sup>2</sup>	(d)(61)(i)
<input type="checkbox"/> Cold solvent cleaning tanks, vapor degreasers, and paint stripping tanks which have a maximum capacity of $\leq 1$ gallon	(d)(61)(ii)

<b>TITLE V APPLICATION</b> <b>Insignificant Activity List (FORM 1401-G)</b>
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**Continued - Exemptions based on Size (Capacity)**

<u>(Condensed Language of Rule)</u>	<u>Appendix A Citation</u>
<input type="checkbox"/> Stationary organic compound storage tanks with a capacity of $\leq 250$ gallons	(e)(1)
<input type="checkbox"/> 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)
<input type="checkbox"/> Liquid surface coating application operations using air brushes with a coating capacity of $\leq 2$ ounces for the application of a stencil coating	(h)(6)
<input type="checkbox"/> Metal inspection tanks that: a) do not utilize a suspension of magnetic or fluorescent dye particles in volatile organic solvent, and b) have a liquid surface area $< 5 \text{ ft}^2$ and c) are not equipped with spray type flow or a means of solvent agitation	(o)(5)
<input type="checkbox"/> Bakery ovens used for baking yeast leavened products where the combined rated heat input capacity is $< 2$ million Btu/hr	(o)(37)

**Exemptions based on Production Rates (Emission Limits)**

<input type="checkbox"/> 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)
<input type="checkbox"/> Solder levelers, hydrosqueegees, wave solder machines, and drag solder machines which use $< 10$ lbs/day of any material containing VOCs	(d)(23)
<input type="checkbox"/> Fire extinguishing equipment, using halons with a charge of $< 50$ lbs. of a Class I or Class II ozone depleting compound.	(d)(31)
<input type="checkbox"/> Coffee roasting equipment with a manufacturer's rating of $\leq 15$ lbs/hr	(d)(45)
<input type="checkbox"/> 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)
<input type="checkbox"/> Oil quenching tanks which use $< 20$ gal/yr of make-up oil	(d)(56)
<input type="checkbox"/> 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.	(d)(48)
<input type="checkbox"/> Powder coating operations, except metalizing gun operations, where surface preparation or cleaning solvent usage is $< 0.5$ gal/day	(d)(62)
<input type="checkbox"/> Equipment used to transfer fuel to & from amphibious ships for maintenance purposes, provided total annual transfers $< 60,000$ gal/yr.	(f)(2)
<input type="checkbox"/> 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)
<input type="checkbox"/> 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)
<input type="checkbox"/> Liquid surface coating application operations exclusively using materials with a VOC content of $< 20 \text{ g/L}$ where $< 30$ gal/day of such materials are applied.	(h)(2)
<input type="checkbox"/> Foam manufacturing or application operations which emit $< 5$ lbs/day of VOCs	(i)(1)
<input type="checkbox"/> Reinforced plastic fabrication operations using resins such as epoxy and/or polyester which emit $< 5$ lbs/day of VOCs	(i)(2)
<input type="checkbox"/> Plastics manufacturing or fabrication operations which emit $< 5$ lbs/day of VOCs	(i)(3)
<input type="checkbox"/> 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)**

- |                          |  |             |
|--------------------------|--|-------------|
| <input type="checkbox"/> | 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)      |
| <input type="checkbox"/> | Batch-type waste-solvent recovery stills with batch capacity of ≤ 7.5 gallons for onsite recovery provided the still is equipped with a safety device & VOC emissions are < 5 lbs/day  | (i)(6)      |
| <input type="checkbox"/> | Peptide and DNA synthesis operations which emit < 5 lbs/day of VOCs  | (i)(7)      |
| <input type="checkbox"/> | 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)      |
| <input type="checkbox"/> | Hot wire cutting of expanded polystyrene foam which emit < 5 lbs/day of VOCs.  | (i)(9)      |
| <input type="checkbox"/> | Any coating and/or ink manufacturing operations located at a stationary source, which emit < 15 lbs/day of VOCs.   | (o)(9)      |
| <input type="checkbox"/> | 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   | (o)(12)     |
| <input type="checkbox"/> | 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.  | (o)(18)     |
| <input type="checkbox"/> | Atmospheric organic gas sterilizer cabinets where ethylene oxide emissions are < 5 lbs/yr  | (o)(28)     |
| <input type="checkbox"/> | 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) |
| <input type="checkbox"/> | 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.                         | (o)(32)     |
| <input type="checkbox"/> | 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.  | (o)(33)     |
| <input type="checkbox"/> | Stationary IC engines rated at ≤ 200 bhp installed and operated before November 15, 2000, which operate < 200 hr/yr.   | (o)(34)(ii) |



**TITLE V APPLICATION**  
**Applicable Requirements Summary Checklist (FORM 1401-H1)**

Goal Line, L.P.	<div>Company Name</div> <div>NEDS #</div> <div>SITE ID #</div>	District Use Only
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**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.**

[illegible]

# TITLE V APPLICATION

[illegible]

**TITLE V APPLICATION**  
**Applicable Requirements Summary Checklist (FORM 1401-H1) - continued**

<b>RULE</b>	<b>RULE DESCRIPTION</b>	<b>Test Method or Rule Section</b>	<b>Monitoring, Records, Rule Section</b>	<b>Facility</b>	<b>PTO-911504</b>	<b>PTO-960443</b>													<b>Future Effective Date</b>
67.6	Solvent Cleaning Operation	(f)																	
67.6.1	Cold Solvent Cleaning and Stripping Operations	(g)	(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)																		

<b>RULE</b>	<b>RULE DESCRIPTION</b>	<b>Test Method or Rule Section</b>	<b>Monitoring, Records, Rule Section</b>	<b>Facility</b>	<b>PTO-911504</b>	<b>PTO-960443</b>													<b>Future Effective Date</b>
67.12	Polyester Resin Operations	(g)	(f)																
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)																
67.20	Motor Vehicle & Mobile Equipment Refinishing Operations																		
67.21	Adhesive Material Application Operations																		
67.22	Expandable Polystyrene Foam Products Manufacturing Operations (not in SIP)																		
67.24	Bakery Ovens	(f)	(e)																
68	Fuel Burning Equipment - NOx																		
69.2	Boilers	(f)	(e) & (g)			×													
69.3	Stationary Gas Turbine Engines - RACT	(f)	(e) & (g)		×														
69.3.1	Stationary Gas Turbine Engines – BARCT (not in SIP)	(f)	(e) & (g)		×														
69.4	Stationary Internal Combustion Engines - RACT	(f)	(e)																
69.4.1	Stationary Internal Combustion Engines – BARCT (not in SIP)	(f)	(e)		×	×													
70	Orchard Heaters																		





TITLE V APPLICATION																	
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued																	

K	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														
RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	PTO-911504	PTO-960443											Future Effective Date

**Subpart**

L	Standards of Performance for Secondary Lead Smelters	260.123															
M	Standards of Performance for Secondary Brass and Bronze Ingot Production Plants	260.133															
O	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	260.335 260.433	260.334		×	×											
QQ	Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing	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		260.584 260.585														
JJJ	Standards of Performance for Petroleum Dry Cleaners	260.583															



TITLE V APPLICATION																			
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued																			

VV	Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry.																		
WW	Beverage Can Surface Coating Industry																		
XX	Bulk Gasoline Terminals																		
AAA	New Residential Wood Heaters																		
DDD	VOC Emissions from the Polymer Mfg. Ind.																		
GGG	Equipment Leaks of VOC in Petroleum Refineries.																		

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	PTO-911504	PTO-960443													Future Effective Date
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**Subpart**

HHH	Synthetic Fiber Production Facilities																		
KKK, LLL	Onshore Natural Gas Processing: VOC Equipment Leaks and SO <sub>2</sub> Emissions.																		
HHH	Synthetic Fiber Production Facilities																		
KKK, LLL	Onshore Natural Gas Processing: VOC Equipment Leaks and SO <sub>2</sub> Emissions.																		
NNN	VOC Emissions from Synthetic Organic Chemical Manufacturing Industry Distillation Operations.																		
OOO	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																		

TITLE V APPLICATION																			
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued																			

III	Stationary Compression Ignition Internal Combustion Engines NSPS																		
III	Stationary Spark Ignition Internal Combustion Engines NSPS																		

**REGULATION XI - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR**

SUBPART	POLLUTANTS (NESHAPS)																		
A	General Provisions																		
	Beryllium Extraction Plants; Ceramic Plants, Foundries, Incinerators, Propellant Plants, and Machine Shops that Process Beryllium Containing Material; and Rocket Motor Firing Test Sites.																		
C, D																			

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	PTO-911504	PTO-960443													Future Effective Date
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**Subpart**

E	Mercury Ore Processing; Manufacturing Processes Using Mercury Chloralkali Cells; and Sludge Incinerators.																		
F	Ethylene Dichloride Mfg. Via Oxygen, HCl and Ethylene; Vinyl Chloride Mfg.; and Polyvinyl Chloride Mfg.																		
M	Asbestos Mills; Roadway Surfacing with Asbestos Tailings; Manufacture of Products Containing Asbestos; Demolition; Renovation; and Spraying and Disposal of Asbestos Waste.																		

**Subpart**

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.																		
H,I,K	Dept. of Energy; Nuclear Regulatory Commission Licensed Facilities; Other Federal Facilities; and Elemental Phosphorus Plants. (Radionuclide)																		
J,L,Y, BB,FF	Fugitive Process, Storage, and Transfer Equipment Leaks; Coke By-Product Recovery Plants; Benzene Storage Vessels; Benzene Transfer Operations; and Benzene Waste Operations.																		



TITLE V APPLICATION																			
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued																			

N,O,P	Glass Manufacturer; Primary Copper Smelter; Arsenic Trioxide and Metallic Arsenic Production Facilities.																		
V	Pumps, Compressors, Pressure Relief Devices, Connections, Valves, Lines, Flanges, Product Accumulator Vessels, etc. in VHAP Service.																		
<b>SUBPART</b>	<b>MACT Standards (40 CFR 63)</b>																		
F,G,H,I	Amendment: Reopening, Averaging Issue																		
L	Coke Ovens																		
O	Ethylene Oxide Sterilizers																		
Q	Industrial Process Cooling Towers																		
R	Gasoline Distribution Facilities																		
<b>RULE</b>	<b>RULE DESCRIPTION</b>	<b>Test Method or Rule Section</b>	<b>Monitoring, Records, Reports, Rule Section</b>	<b>Facility</b>	<b>PTO-911504</b>	<b>PTO-960443</b>													<b>Future Effective Date</b>
<b>Subpart</b>																			
T	Halogenated Solvent Cleaning Degreasing																		
X	Secondary Lead Smelters																		
Y	Marine Tank Loading/Unloading																		
CC	Petroleum Refineries																		
DD	Off-Site Waste and Recovery Operations																		
EE	Magnetic Tape																		
GG	Aerospace (Coatings)																		
II	Shipbuilding for Ship Repair (Surface Coating)																		
JJ	Wood Furniture Industry (Coatings)																		
KK	Printing and Publishing																		

TITLE V APPLICATION																
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued																

AAAA	Municipal Solid Waste Landfills															
DDDDD	Industrial, Commercial and Institutional Boilers and Process Heaters															
MMMM	Surface Coating of Miscellaneous Metal Parts and Products															
PPPP	Surface Coating of Plastic Parts															
ZZZZ	Reciprocating Internal Combustion Engines															
YYYY	Stationary Combustion Turbines															

**California Requirements Under 17 CCR Including Airborne Toxic Control Measures (ATCM)**

§93102	Hexavalent Chromium from Chrome Plating and Chromic Acid Anodizing Operations (equivalency under CAA given at 40 CFR 63.99)															
§93109	Perchloroethylene from Dry Cleaning Operations (equivalency under CAA given at 40 CFR 63.99)															
§93115	Stationary Compression Ignition Engines															
§93116	Diesel Particulate Matter from Portable Engines Rated ≥50 Horsepower															
§§95460 – 95476 and Appx I	Methane Emissions from Municipal Solid Waste Landfills															

	<b>40 CFR Part 64 - Compliance Assurance Monitoring</b>															
	<b>40 CFR Part 68 Chemical Accident Prevention</b>															
	<b>Title IV – Acid Rain (40 CFR 72 through 78)</b>															

**Title VI-Ozone Depleting Compounds (40 CFR 82)**

B	Servicing of Motor Vehicle Air Conditioners	B														
F	Servicing of Other Air Conditioners	F														

**APPLICANT NOTE:** Other Applicable Requirements embedded within existing PTO permit conditions include:

Facility-wide: Rule 1410; Rule 1421  
 APCD 2001-PTO-911504: 40 CFR Part 60.8; Subpart KKKK; Rule 1421; Reg XII, Rule 1200; and CA 42706 (emission standard violation reporting) and 44300 (Air Toxic "Hot Spots")  
 APCD1999-PTO-960443: 40 CFR Part 60 subpart Dc; CA 44300 (Air Toxic "Hot Spots")

**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)**

<b>Company Name</b>  Goal Line, L.P. <hr/>	<b>District Use Only</b>  NEDS # _____ SITE ID # _____
Facility Address: 555 North Tulip Street, Escondido, CA 92025 <hr/>	

**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
Turbine - Electric and Steam Generation	APCD2001-PTO-911504	O
Boiler - Steam Generation	APCD1999-PTO-960443	O

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
Goal Line, L.P.	NEDS # _____
Facility Address: 555 North Tulip Street, Escondido, CA, 92025	SITE ID # _____

*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 reasonable inquiry, the source(s) identified in this application will continue to comply with the applicable requirement with which the source is in compliance. The applicable requirement(s) with which the source(s) is/are not in compliance is/are identified in Form 1401-L, Schedule of Compliance.*



*Based on information and belief formed after reasonable inquiry, the source(s) identified in this application will comply with the future-effective applicable requirement(s) on a timely basis.*



*Based on information and belief formed after reasonable inquiry, the source(s) identified in the Schedule of Compliance application form that is/are not in compliance with the applicable requirement(s), will comply in accordance with the attached compliance plan schedule.*



*Based on information and belief formed after reasonable inquiry, information on application forms, referenced documents, all accompanying reports, and other required certifications are true, accurate, and complete.*



*All fees required by Regulation III, Rule 40 have been paid.*

**Jason W. King** Digitally signed by Jason W. King  
Date: 2021.07.28 07:55:13 -07'00'

Signature of Responsible Official

Date July 19, 2021

**Jason King**

Print Name of Responsible Official

**(619) 344-0538**

Telephone No. of Responsible Official

**Plant Manager**

Title of Responsible Official



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**  
**Compliance Certification Schedule (FORM 1401-K)**

Goal Line, L.P.	Company Name	District Use Only
Facility Address: 555 North Tulip Street, Escondido, CA 92025		NEDS # _____ SITE ID # _____

In numerical order, list all sources that have federally enforceable requirements for compliance certification on a more frequent basis than once per year. **If more space is required, use additional forms. Please type or print legibly.**

Permit No.	Emission Unit Name	Applicable Requirements	Frequency
None: Not applicable, all sources are on annual compliance certification schedules			
Compliance with APCD2021-NOV-000150 was in place prior to settlement.			

**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**  
**Schedule of Compliance (FORM 1401-L)**

<div style="text-align: center; border-bottom: 1px solid black; margin-bottom: 10px;"><b>Company Name</b></div> <div style="border-bottom: 1px solid black; margin-bottom: 10px;">Goal Line, L.P.</div> <div>Facility Address: <u>555 North Tulip Street, Escondido, CA 92025</u></div>	<div style="text-align: center; border-bottom: 1px solid black; margin-bottom: 10px;"><b>District Use Only</b></div> <div style="margin-bottom: 10px;">NEDS # _____</div> <div>SITE ID # _____</div>
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**SOURCES NOT IN COMPLIANCE**

In numerical order, list all emission units by permit number that do not comply with a federally enforceable requirement. Describe how the source will achieve compliance. Propose a schedule to correct the deficiencies, and include a schedule for progress reports. Reports must be submitted at least every six months. If the source is operating under a judicial consent decree or administrative order, the Schedule of Compliance must be at least as stringent. **If more space is required, use additional forms. Please type or print legibly.**

Permit No.	Emission Unit Name	Applicable Requirements	Compliance Schedule Attachment
APCD2001-PTO-911504	Condition 11: NOx and O2 CEMS	District Rule 21 PTO	APCD2021-NOV-000150
APCD2016-TVP-00043	Same as above	District Rule Title V 1421(d)(1)	APCD2021-NOV-000150
			Compliance Achieved by corrective actions.



## SETTLEMENT OFFER

May 14, 2021

JASON KING  
GOAL LINE LP  
555 NORTH TULIP ST  
ESCONDIDO, CA 92025

[jason.king@onwardenergy.com](mailto:jason.king@onwardenergy.com)

RE: **NOTICE OF VIOLATION NUMBER(S) APCD2021-NOV-000150**

Location of Violation: 555 North Tulip St, Escondido, CA 92025

Rule/Section Violated: 1421(d)(1), 21

Dear Mr. King:

The San Diego County Air Pollution Control District (District) issued Notice of Violation No(s). APCD2021-NOV-000150 (copy enclosed) to Goal Line LP for the following reason(s):

On February 23, 2021, a District Inspector found that Goal Line LP had failed to conduct a linearity check within the grace period specified in 40 CFR 75 App B, in violation of District Rules 21 and 1421. A linearity check was conducted and passed 27 days after the end of the grace period. Goal Line's attorney disputed the violation, stating that the only consequence of the late test is that CEMS data collected after the grace period must be substituted per Appendix C. The District holds that the CFR does not state that data substitution absolves the tardiness of the linearity check, nor preclude the District from taking enforcement action on a late linearity check. In assessing the penalty below, the District has also positively considered Goal Line's corrective action of setting a more definite schedule for linearity checks.

Penalties for such violations are determined according to the California Health & Safety Code and can include civil penalties of up to \$10,000 for each day of each violation. The amount of the District's settlement offer specified below takes into account the magnitude and severity of the violation, as well as the prior history of violations of a similar nature. The District also considers, if relevant, how well equipment was maintained, whether control equipment was unproven or innovative, and any action taken to mitigate the violation, including any quick cleanup or construction. For more information on the District's Violation Settlement Program, please see [http://www.sdapcd.org/content/sdc/apcd/en/compliance-programs/Violation\\_Information.html](http://www.sdapcd.org/content/sdc/apcd/en/compliance-programs/Violation_Information.html).

The District would like to settle this matter without going to court. Based on currently available information, I am authorized to settle this matter as follows:

1. **Payment of a civil penalty in the amount of \$500.**
2. Upon receipt of the payment, Goal Line LP shall be released from any and all claims by the District for civil or criminal penalties arising out of the violations of District Rules and air quality laws referred to in the Notice of Violation. However, such release does not relieve Goal Line LP from complying with the regulations of other government agencies, and it does not address or resolve violations of regulations which may be enforced by any other agency.

3. Settlement of this matter shall not constitute an admission of liability in any administrative or judicial proceeding, nor shall evidence of the settlement be admissible in any such proceeding.
4. However, the District reserves the right to prove the alleged violation in connection with any petition for a variance, permit revocation, or abatement order before the District Hearing Board, or to rely on the alleged violation in connection with the determination of the appropriate penalty in the event similar Notices of Violation are issued in the future. Similarly, at any such time you could present information you have regarding the alleged violations.

Please be assured that the District is aware of the potentially severe business impacts related to the COVID-19 pandemic. If your business has been financially or operationally impacted by the COVID-19 crisis, please provide additional information about how it has been impacted. The District will consider the information provided during the settlement process.

If you would like to discuss this matter or provide additional information for consideration, you may contact me at (858) 945-1753 or at [scott.nester@sdcounty.ca.gov](mailto:scott.nester@sdcounty.ca.gov).

If you would like to pay by major credit card, please call (858) 586-2600 and ask for the Accounting Division. If you would like to pay by check, please make the check payable to SDAPCD, write the reference number, **APCD2021-NOV-000150**, on your check, and send payment to:

ATTENTION: Accounting  
San Diego County Air Pollution Control District  
10124 Old Grove Road  
San Diego, CA 92131

Please be aware that this email attachment is the only notice you will receive; you will not receive this notice or an invoice in the mail. If we do not hear from you within 25 days, we will assume that you are not interested in resolving this matter. Violations that cannot be settled may be referred for litigation.

Sincerely,



SCOTT NESTER  
Civil Actions Investigator

Enclosure

**IF YOU HAVE ANY LEGAL QUESTIONS REGARDING SETTLEMENT, PENALTIES, OR  
PROCEDURES, YOU MAY SEEK THE ADVICE OF AN ATTORNEY.**



**NOTICE OF VIOLATION**Date(s) of Violation Start: **08/01/2020** End: **08/28/2020**Date of Report: **02/23/2021**Name: **Goal Line LP**Phone: **760-292-9394**Violation Location: **555 North Tulip St**City: **Escondido**Zip: **92025**

Specifically, the following violation(s) of the San Diego Air Pollution Control District rules and/or laws of the State of California has occurred: (abbreviations: H&S = Cal. Health & Safety Code; CCR=Cal Code of Regulations; R=Rule)

Section(s)/Rule(s)	Description of Violation
Law Type: District Rules Category: Permit to Operate Section: 21	Condition 11: All NOx and O2 CEMS shall be installed, certified, and maintained pursuant to applicable Federal Regulations including the requirements of Appendix B of 40 CFR 75 and a CEMS Protocol approved by the District.  Specifically, for failing to conduct NOx and O2 linearity checks as required by Appendix B of 40 CFR 75.
Law Type: District Rules Category: Title V Section: 1421(d)(1)	APCD2016-TVP-00043 - The permittee shall comply with all terms and conditions of this permit.  Specifically, same as above.

Pursuant to California Health and Safety Code section 42400 et seq., any person who violates any Order, Rule, or Regulation of the Air Pollution Control District is guilty of a MISDEMEANOR. Each day a violation occurs constitutes a separate offense.

**YOU MUST ADVISE THE DISTRICT IN WRITING, WITHIN TEN BUSINESS DAYS, OF THE ACTION TAKEN TO CORRECT ALLEGED VIOLATION(S) OR THE REASON(S) YOU BELIEVE THE VIOLATION(S) DID NOT OCCUR. PLEASE SEND YOUR RESPONSE TO THE AIR POLLUTION CONTROL DISTRICT, [apcdcomp@sdcounty.ca.gov](mailto:apcdcomp@sdcounty.ca.gov) or ATTENTION: COMPLIANCE DIVISION, 10124 OLD GROVE RD, SAN DIEGO, CALIFORNIA 92131-1649.**

Inspector Name: **Nick Critti**Date: **02/23/2021**Time: **7:55**

AM

Inspector Signature:

**Critti, Nick**Digitally signed by Critti, Nick  
Date: 2021.02.23 07:54:04 -08'00'Received by: **Jason King**Title: **Plant Manager**Email Address: **[jason.king@onwardenergy.com](mailto:jason.king@onwardenergy.com)**Date: **02/22/2021**Signature: **Issued Electronically**

## **WHAT A "NOTICE OF VIOLATION" MEANS**

You have just received a NOTICE OF VIOLATION from the San Diego County Air Pollution Control District, a government agency responsible for air pollution control in San Diego County. A Notice of Violation is the District's claim that someone has violated the District's rules, state, and/or federal laws applying to air pollution. The District is authorized by state law to seek penalties for violations.

## **WHAT TO DO IF YOU RECEIVE A NOTICE OF VIOLATION**

If you receive a Notice of Violation, take IMMEDIATE action to prevent the violation from recurring. Each additional day of non-compliance may be considered an additional Violation.

ADVISE THE DISTRICT IN WRITING OF THE ACTION TAKEN TO CORRECT THE ALLEGED VIOLATION OR THE REASON(S) YOU THINK THE VIOLATION DID NOT OCCUR. SUBMIT YOUR RESPONSE WITHIN TEN BUSINESS DAYS OF THE DATE THE NOTICE OF VIOLATION IS ISSUED. MAIL YOUR RESPONSE TO: AIR POLLUTION CONTROL DISTRICT, ATTENTION: COMPLIANCE DIVISION, 10124 OLD GROVE RD, SAN DIEGO, CALIFORNIA 92131-1649, OR email to [APCDCOMP@sdcounty.ca.gov](mailto:APCDCOMP@sdcounty.ca.gov), ATTENTION: COMPLIANCE DIVISION.

If you need to continue using the equipment that is allegedly causing the violation, you may petition the Hearing Board for a VARIANCE. A variance allows you to legally operate the equipment causing the violation while you are working to correct the problem. The District does not grant variances, but it can tell you how to apply for a variance. Contact the District's Compliance Division at (858) 586-2650, if you wish to option this information. If you believe the equipment is not causing a violation and you continue to operate without a variance, penalties may be assessed for each day the District determines the equipment caused a violation.

## **HOW THE NOTICE OF VIOLATION WILL BE RESOLVED**

The District will review the information submitted in your written response to determine how to handle the alleged violation. If the District determines that a violation did not occur, the Notice of Violation will be dismissed. Where a violation is found to have occurred, the Notice of Violation is usually handled through the District's "Violation Settlement Program". A Notice of Violation could also result in civil or criminal prosecution.

### **VIOLATION SETTLEMENT PROGRAM**

If the District determines that a Notice of Violation should be handled through this program, a letter will be sent offering to settle the Notice of Violation. If there is not a response within 14 days, the violation may be referred for civil or criminal prosecution. The letter sent will usually require the payment of a penalty.

### **CIVIL PROSECUTION**

A Notice of Violation which is not resolved through the Violation Settlement Program may be referred for civil prosecution. If so, a lawsuit may be filed against you seeking maximum penalties for the violation. The maximum penalties established by the California Health and Safety Code range between \$5,000 and \$1,000,000 per day of violation, depending on the nature of the violation

### **CRIMINAL PROSECUTION**

In serious cases, a Notice of Violation may be referred for criminal prosecution. The maximum penalty established by the California Health and Safety Code is \$1,000 - \$1,000,000 per day of violation or up to one year in jail, or both.

**PLEASE SUBMIT ALL CORRESPONDENCE TO THE DISTRICT AT THE ADDRESS SHOWN ON THE FRONT OF THIS FORM. YOU MAY CALL (858) 586-2650 SHOULD YOU WISH TO CHECK THE STATUS OF YOUR VIOLATION.**

Receipt for Payment

AIR POLLUTION CONTROL  
10124 OLD GROVE ROAD  
SAN DIEGO, CA 92131

05/26/2021 11:33:11  
MID: XXXXXXXXXXXX005 TID: XXXX401

CREDIT CARD

AMEX SALE

Card #	XXXXXXXXXX2001
SEQ #:	4
Batch #:	1233
INVOICE	5
Approval Code:	265190
Entry Method:	Manua
Mode:	Online
Card Code:	M

SALE AMOUNT \$500.00

I agree to pay above total amount  
according to card issuer agreement.  
(Merchant agreement if Credit Voucher)

X \_\_\_\_\_

MERCHANT COPY

**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)**

<div style="text-align: center; border-bottom: 1px solid black; margin-bottom: 10px;"><b>Company Name</b></div> <div style="border-bottom: 1px solid black; margin-bottom: 10px;">Goal Line, L.P.</div> <div>Facility Address: <u>555 North Tulip Street, Escondido, CA 92025</u></div>	<div style="text-align: center; border-bottom: 1px solid black; margin-bottom: 10px;"><b>District Use Only</b></div> <div style="border-bottom: 1px solid black; margin-bottom: 10px;">NEDS # _____</div> <div style="border-bottom: 1px solid black;">SITE ID # _____</div>
---	--

**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
APCD2001-PTO-911504	Water injection - gas turbine	Gas turbine - NOx
	Ammonia Injection - gas turbine	Gas turbine - NOx
	SCR - gas turbine	Gas turbine - NOx
APCD1999-PTO960443	Low NOx Burner - Aux Boiler	Aux Boiler - NOx

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**  
**Alternative Operating Scenario (FORM 1401-N)**

<b>Company Name</b> Goal Line, L.P.	<b>District Use Only</b> NEDS # _____ SITE ID # _____
Facility Address: 555 North Tulip Street, Escondido, CA 92025	

**SCENARIO WITH EMISSION CHANGES**

Give a title, a brief description, and an emission change. Attach calculations and detailed descriptions of each scenario to this form, using one form for each scenario. **Please type or print legibly.**

**Operating Scenario #** See Note \_\_\_\_\_

<b>TITLE</b>	See Note
--------------	----------

<b>DESCRIPTION</b>	See Note
--------------------	----------

<b>EMISSION CHANGE</b>	See Note
------------------------	----------

Attach all necessary calculations, detailed descriptions, and proposed terms and conditions to this form.

**Note:** No alternative operating scenarios are proposed. The primary operating scenario is defined within the current TVP and PTO's.



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)**

<b>Company Name</b> <u>Goal Line, L.P.</u>	<b>District Use Only</b> <b>NEDS #</b> _____
Facility Address: <u>555 North Tulip Street, Escondido, CA 92025</u>	<b>SITE ID #</b> _____

**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
	See Attached document: 2016 Goal Line T5 Streamlining Table, included in initial Title V application.		

# San Diego County Air Pollution Control District

## Title V Application - COMPLIANCE PLAN STREAMLINING ANALYSIS

Company Name: <b>GOAL LINE L.P.</b>		Facility Address: <b>555 North Tulip Street, Escondido, CA 92025</b>	
Type of Requirement	Subsumed Requirement	Subsuming Requirement(s)	Analysis
<b>Gas Turbine (PTO 911514)</b>			
Emissions Limit	<p><b>District Rule 69.3(b)(2)(ii) and (d):</b></p> <p>NOx emissions shall not exceed 45 ppmvd @ 15% O<sub>2</sub> when operated on a gaseous fuel, except during a startup or shutdown period not to exceed 120 minutes.</p> <p><b>District Rule 69.3.1(b)(3)(i) and (d)(1):</b></p> <p>NOx emissions shall not exceed 9 ppmvd @ 15% O<sub>2</sub> (adjusted for turbine efficiency) when operated on a gaseous fuel, except during a startup or shutdown period not to exceed 120 minutes.</p>	<p><b>Condition #5:</b></p> <p>The SCR equipment shall reduce the total NOx to 5 ppmvd @ 15% O<sub>2</sub> over a 1-hour average.</p> <p><b>Condition #14:</b></p> <p>The 5 ppm NOx limit shall not apply during the first 120 minutes immediately following a startup or during the first 60 minutes prior to a shutdown.</p>	<p>The routine NOx emission limit of 5 ppmvd @ 15% O<sub>2</sub> is more stringent and has a similar startup/shutdown exemption. Therefore, the routine NSR limit is more stringent than – and subsumes – the Rule 69.3 and Rule 69.3.1 NOx limits.</p> <p>The higher NOx emission limit can be attained solely through the use of water injection. SCR is required, in conjunction with water injection, to meet the routine 5 ppmvc routine NSR NOx limit. Furthermore, a CEMS is used to monitor compliance with the routine NOx limit and there is no regulatory basis for Condition #4. Therefore, the routine NOx limit (and corresponding CEMS monitoring requirement) subsumes the water-to-fuel ratio operating limit of Condition #4.</p>
	<p><b>40 CFR 60.332(a)(1):</b></p> <p>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 75 ppmv</p>	<p><b>Condition #5:</b></p> <p>The SCR equipment shall reduce the total NOx to 5 ppmvd @ 15% O<sub>2</sub> over a 1-hour average.</p>	<p>The routine NOx emission limit of 5 ppmvd @ 15% O<sub>2</sub> is more stringent. Although the Subpart GG NOx limit does not have a startup/shutdown exemption, the water injection system is operational minutes after startup commences and reduces NOx emissions</p>

Company Name: <b>GOAL LINE L.P.</b>		Facility Address: <b>555 North Tulip Street, Escondido, CA 92025</b>	
Type of Requirement	Subsumed Requirement	Subsuming Requirement(s)	Analysis
	<p>@ 15% O<sub>2</sub> on a dry basis.</p> <p><b>40 CFR 60.334(j)(1)(iii)(A):</b></p> <p>An hour of excess emissions shall be any unit operating hour in which the 4-hour rolling average NOx concentration exceeds the applicable emission. A “4-hour rolling average NOx concentration” is the arithmetic average of the average NOx concentration measured by the CEMS for a given hour (corrected to 15% O<sub>2</sub> and the three immediately preceding unit operating hours.</p>	<p><b>Condition #11:</b></p> <p>Excess emissions are defined as any 1-hour period during which the average NOx concentration, as measured by the CEMS, exceeds the NOx emission limit.</p> <p><b>Condition #14:</b></p> <p>The 5 ppm NOx limit shall not apply during the first 120 minutes immediately following a startup or during the first 60 minutes prior to a shutdown. The NOx emission rate shall not exceed 25 lb during any four consecutive clock quadrants during startup or shutdown.</p> <p><b>40 CFR 60.11(d):</b></p> <p>At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.</p>	<p>to &lt; 25 ppmvd @ 15% O<sub>2</sub>. Therefore, the combined routine and startup/shutdown NSR limits are more stringent than – and subsume – the Subpart GG NOx limit.</p> <p>The 1-hour averaging requirement of Condition #11 subsumes the 4-hour averaging requirement of Subpart GG because the corresponding NOx limits of Conditions #5 and #14 subsume the corresponding Subpart GG NOx limit.</p>
Emissions Limit	<p><b>40 CFR 60.333:</b></p> <p>No owner or operator shall burn in any stationary gas turbine any fuel which contains total sulfur in excess of 0.8 % by weight (8000 ppmw).</p>	<p><b>Rule 62(b)(1):</b></p> <p>Gaseous fuel shall contain not more than 10 gr of sulfur (as H<sub>2</sub>S)/ 100 scf.</p>	<p>The Rule 62 fuel sulfur limit equates to 0.03% fuel sulfur, by weight, which is more stringent. Therefore, the Rule 62 fuel sulfur limit is more stringent than – and subsumes – the Subpart GG fuel sulfur limit.</p>

Company Name: <b>GOAL LINE L.P.</b>		Facility Address: <b>555 North Tulip Street, Escondido, CA 92025</b>	
Type of Requirement	Subsumed Requirement	Subsuming Requirement(s)	Analysis
Monitoring	<p><b>Condition #9:</b></p> <p>Permittee shall certify, calibrate, maintain, and operate a CEMS for monitoring O<sub>2</sub> and NOx concentrations. The CEMS shall meet the most current USEPA performance specifications and quality assurance procedures found in 40 CFR 60 Appendix B and Appendix F.</p> <p><b>40 CFR 60.13(a):</b></p> <p>All CEMS shall be subject to the provisions of this section upon promulgation of performance specifications for continuous monitoring systems under Part 60 Appendix B and, if the CEMS is used to demonstrate compliance with emission limits on a continuous basis, Part 60 Appendix F.</p> <p><b>40 CFR 60.334(b)(1):</b></p> <p>Each CEMS must be installed and certified according to PS 2 and 3 (for diluent) of Part 60, Appendix B.</p>	<p><b>40 CFR 60.334(b)(3)(iii):</b></p> <p>If the owner or operator has installed a Part 75 NOx CEMS, and is continuing to meet the ongoing requirements of Part 75, the CEMS may be used to meet the requirements of Part 60, Subpart GG, except that the Part 75 missing data substitution methodology is not required for purposes of identifying excess emissions. Instead, periods of missing CEMS data are to be reported as monitor downtime in the Excess Emissions and Monitor Performance Report.</p>	<p>Subpart GG allows the operator to use a Part 75 NOx/O<sub>2</sub> CEMS in lieu of a Part 60 CEMS. Goal Line became an affected facility under Part 75 on December 31, 2015. Furthermore, Goal Line submitted an ATC application to the District to incorporate the Acid Rain monitoring requirements into the PTO, including those requirements that allow Goal Line to use its Part 75 CEMS in lieu of the Part 60 CEMS.</p>
Monitoring	<p><b>District Rule 69.3.1(b)(3)(i) and (d)(1):</b></p> <p>NOx emissions shall not exceed 9 ppmvd @ 15% O<sub>2</sub> (adjusted for turbine efficiency) when operated on a gaseous fuel, except during a startup or shutdown period not to exceed 120 minutes.</p>	<p><b>Condition #5:</b></p> <p>The SCR equipment shall reduce the total NOx to 5 ppmvd @ 15% O<sub>2</sub> over a 1-hour average.</p> <p><b>Condition #14:</b></p> <p>The 5 ppm NOx limit shall not apply during the first 120 minutes immediately following a</p>	<p>The HHV/LHV analyses are required for the turbine efficiency calculation for Rule 63.3.1 compliance. However, the routine NSR NOx limit subsumes the Rule 69.3.1 NOx limit and therefore the corresponding Rule 69.3.1 turbine efficiency measurement is also a subsumed requirement.</p>

Company Name: <b>GOAL LINE L.P.</b>		Facility Address: <b>555 North Tulip Street, Escondido, CA 92025</b>	
Type of Requirement	Subsumed Requirement	Subsuming Requirement(s)	Analysis
	<p><b>District Rule 69.3.1(f)(2):</b></p> <p>The HHV and LHV of the natural gas shall be determined by the ASTM Test Method D1826-94(2003), or D1945-03, in conjunction with ASTM Test Method D3588-98(2003) [or their most current versions] and can be provided by a fuel supplier.</p>	startup or during the first 60 minutes prior to a shutdown.	
	<p><b>40 CFR 60.334(j)(5):</b></p> <p>For each affected unit that elects to continuously monitor parameters or emissions, the owner or operator shall submit reports of excess emissions and monitor downtime. Excess emissions shall be reported for all periods of unit operation, including startup, shutdown, and malfunction. All reports shall be post-marked by the 30th day following the end of each 6-month period.</p>	<p><b>Rule 19.2(d)(2):</b></p> <p>Operators shall submit a written report for each calendar quarter to the District. The report is due by the 30th day following the end of the calendar quarter and shall include:</p> <ul style="list-style-type: none"> <li>(i) Time intervals, date and magnitude of excess emissions, nature and cause of the excess (if known), corrective actions taken and preventive measures adopted.</li> <li>(ii) Averaging period used for data reporting corresponding to averaging period specified in the emission test period used to determine compliance with an emission standard for the pollutant/source category in question.</li> <li>(iii) Time and date of each period during which the continuous monitoring system was inoperative, except for zero and span checks, and the nature of system repairs and adjustments.</li> <li>(iv) A negative declaration when no excess emissions occurred.</li> </ul>	<p>The District Quarterly CEMS Report contains the more stringent detail reporting requirements of 40 CFR 60.7(c), which merely requires a less stringent summary report as described in 60.7(d). Furthermore, the District CEMS Report has more stringent quarterly reporting frequencies than the semi-annual reporting for the Part 60 Report. Therefore, the Rule 19.2 Quarterly CEMS is more stringent than – and subsumes – the Part 60 Report.</p>
Reporting	<p><b>40 CFR 60.7(d):</b></p> <p>One summary report form shall be submitted for each pollutant monitored at each affected facility. If the total duration of excess emissions for the reporting period is less than 1% of the total operating time and CEMS downtime for the reporting period is less than 5%, only the summary report form shall be submitted. If the total duration of excess emissions for the reporting period is <math>\geq 1\%</math> or the total CMS downtime is <math>\geq 5\%</math>, the detail report also shall be submitted.</p>		

Company Name: <b>GOAL LINE L.P.</b>		Facility Address: <b>555 North Tulip Street, Escondido, CA 92025</b>	
Type of Requirement	Subsumed Requirement	Subsuming Requirement(s)	Analysis
Reporting (cont'd)	<p><b>40 CFR 60.7(c):</b></p> <p>Each owner or operator shall submit an excess emissions and monitoring systems performance report and/or summary report form semiannually. All reports shall be postmarked by the 30<sup>th</sup> day following the end of each six month period. Written reports of excess emissions shall include the following information:</p> <ul style="list-style-type: none"> <li>• The magnitude of excess emissions computed in accordance with 60.13(h).</li> <li>• The date and time of commencement and completion of each time period of excess emissions.</li> <li>• The process operating time during the reporting period.</li> <li>• Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility.</li> <li>• The nature and cause of any malfunction, the corrective action taken or preventative measures adopted.</li> <li>• The date and time identifying each period during which the CMS was inoperative except for zero and span checks and the nature of the system repairs or adjustments.</li> <li>• A negative declaration when no excess emissions have occurred or the CMSs have not been inoperative, repaired, or adjusted.</li> </ul>	See above	



Company Name: <b>GOAL LINE L.P.</b>		Facility Address: <b>555 North Tulip Street, Escondido, CA 92025</b>	
Type of Requirement	Subsumed Requirement	Subsuming Requirement(s)	Analysis
<b>Auxiliary Boiler (PTO 960443)</b>			
Emission Limit	<b>District Rule 68(b)(3) and (d):</b> NOx emissions from non-vehicular fuel burning equipment shall not exceed 125 ppmvd @ 3% O <sub>2</sub> except during a continuous 30-minute period for startup or shutdown.	<b>Condition #4:</b> NOx emissions (as NO <sub>2</sub> ) shall not exceed 30 ppmvd @ 3% O <sub>2</sub> when operated on a gaseous fuel.	The NSR NOx emission limit of 30 ppmvd @ 3% O <sub>2</sub> is more stringent. Therefore, the NSR limit is more stringent than – and subsumes – the Rule 68 NOx limit.

**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)**

<b>Company Name</b> <u>Goal Line, L.P.</u>	<b>District Use Only</b> <b>NEDS #</b> _____ <b>SITE ID #</b> _____
Facility Address: <u>555 North Tulip Street, Escondido, CA 92025</u>	

**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
2016-TVP-00043	SDAPCD Rule 69.3.1(d)(1), 69.3(d)(1)	Subsumed by BACT NOx emission limit based on Rule 20.2	
2016-TVP-00043	40 CFR 60.333	Sulfur/SOx standards subsumed by BACT mandated requirement	
		to use pipeline quality natural gas & monitor sulfur content	
<b>See:</b> APCD2016-TVP-00043 at Section II. Facility-Wide Requirements, subsection C. Permit Shields for requirements shielded from enforcement actions in accordance with District Rule 1410(p) and the initial T5 Streamlining Table Analysis submitted with the original Title V application.			



# Acid Rain Permit Application

For more information, see instructions and 40 CFR 72.30 and 72.31.

This submission is: ☐ new ☐ revised ☒ for ARP permit renewal

## STEP 1

Identify the facility name,  
State, and plant (ORIS) code.

Facility (Source) Name	Goal Line, L.P.	State	California	Plant Code	54749
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## STEP 2

Enter the unit ID# for every  
affected unit at the affected  
source in column "a."

a	b
Unit ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)
APCD2001-PTO-911504	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes

Facility (Source) Name (from STEP 1) Goal Line, L.P.
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**STEP 3****Permit Requirements****Read the standard requirements.**

- (1) The designated representative of each affected source and each affected unit at the source shall:
  - (i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and
  - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each affected source and each affected unit at the source shall:
  - (i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and
  - (ii) Have an Acid Rain Permit.

**Monitoring Requirements**

- (1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

**Sulfur Dioxide Requirements**

- (1) The owners and operators of each source and each affected unit at the source shall:
  - (i) Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and
  - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
  - (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
  - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

**Nitrogen Oxides Requirements**

The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Facility (Source) Name (from STEP 1) Goal Line, L.P.
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**STEP 3, Cont'd.****Excess Emissions Requirements**

- (1) The designated representative of an affected source that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an affected source that has excess emissions in any calendar year shall:
  - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
  - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

**Recordkeeping and Reporting Requirements**

- (1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
  - (i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
  - (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
  - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
  - (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

**Liability**

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
- (6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Facility (Source) Name (from STEP 1) Goal Line, L.P.
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**STEP 3, Cont'd.****Effect on Other Authorities**

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a source can hold; provided, that the number of allowances held by the source shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- (5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

**STEP 4****Certification**

**Read the certification statement, sign, and date.**

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name <b>Jason King</b>		
Signature	<b>Jason W. King</b> <small>Digitally signed by Jason W. King Date: 2021.07.28 07:56:14 -07'00'</small>	Date <b>July 19, 2021</b>





# Instructions for the Acid Rain Program Permit Application

*The Acid Rain Program requires the designated representative to submit an Acid Rain permit application for each source with an affected unit. A complete Certificate of Representation must be received by EPA before the permit application is submitted to the Title V permitting authority. A complete Acid Rain permit application, once submitted, is binding on the owners and operators of the affected source and is enforceable in the absence of a permit until the Title V permitting authority either issues a permit to the source or disapproves the application.*

Please type or print. If assistance is needed, contact the Title V permitting authority.

**STEP 1** A Plant Code is a 4 or 5 digit number assigned by the Department of Energy's (DOE) Energy Information Administration (EIA) to facilities that generate electricity. For older facilities, "Plant Code" is synonymous with "ORISPL" and "Facility" codes. If the facility generates electricity but no Plant Code has been assigned, or if there is uncertainty regarding what the Plant Code is, send an email to the EIA. The email address is [EIA-860@eia.gov](mailto:EIA-860@eia.gov).

**STEP 2** In column "a," identify each unit at the facility by providing the appropriate unit identification number, consistent with the identifiers used in the Certificate of Representation and with submissions made to DOE and/or EIA. Do not list duct burners. For new units without identification numbers, owners and operators must assign identifiers consistent with EIA and DOE requirements. Each Acid Rain Program submission that includes the unit identification number(s) (e.g., Acid Rain permit applications, monitoring plans, quarterly reports, etc.) should reference those unit identification numbers in exactly the same way that they are referenced on the Certificate of Representation.

## Submission Deadlines

For new units, an initial Acid Rain permit application must be submitted to the Title V permitting authority 24 months before the date the unit commences operation. Acid Rain permit renewal applications must be submitted at least 6 months in advance of the expiration of the acid rain portion of a Title V permit, or such longer time as provided for under the Title V permitting authority's operating permits regulation.

## Submission Instructions

Submit this form to the appropriate Title V permitting authority. If you have questions regarding this form, contact your local, State, or EPA Regional Acid Rain contact, or call EPA's Clean Air Markets Hotline at (202) 343-9620.

## Paperwork Burden Estimate

This collection of information is approved by OMB under the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. (OMB Control No. 2060-0258). Responses to this collection of information are mandatory (40 CFR 72.30 and 72.31). An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The public reporting and recordkeeping burden for this collection of information is estimated to be 8 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden to the Regulatory Support Division Director, U.S. Environmental Protection Agency (2821T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.