

STATEMENT OF BASIS
Title V Permit Renewal

Facility Name: Goal Line LP (EID:8469)
Title V App. Number: APCD2021-APP-006884
Title V Permit Number: APCD2016-TVP-00043
Facility ID: APCD1992-SITE-08447
Equipment Address: 555 N. Tulip Street
Escondido CA, 92025
Facility Contact: Jason King
Contact Phone: (619) 344-0538
Permit Engineer: Liliana Jaime
Date: 10/24/2023
Senior Engineer: Nick Horres

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

1. Type of action and summary of changes

This application is for the renewal of the Title V operating permit (APCD2016-TVP-00043) for Goal Line L.P. This facility is subject to Title V permitting because it is subject to the acid rain program under Title IV of the federal Clean Air Act (CAA) which requires Title V permitting pursuant to 40 CFR § 70.3.

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

The renewal application was received on July 30, 2021. The Title V permit expires on October 26, 2022. This renewal application was submitted at least 12 months but not more than 18 months prior to permit expiration, in accordance with Rule 1410. The application therefore is timely.

There have been no applications to modify the equipment since the initial Title V permit application.

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

Title V Application History			
<u>Application Number</u>	<u>Application Description</u>	<u>Equipment</u>	<u>Approved?</u>
APCD2016-APP-004597	Title V Application	Turbine set	Yes
APCD2020-APP-006444	Title V Current Renewal	Turbine set	Current Renewal

3. Facility Description

The facility is a power generation facility that has one permit, as listed in the table below:

Permit Number	Equipment Description
APCD2001-PTO-911504	Combined Cycle Cogeneration Gas Turbine: GE LM6000 combustion turbine/generator set, rated at 42.4 MW (404.8 MM BTU/HR HHV), with water injection, fueled with natural gas only, one (1) selective catalytic reduction (SCR) unit including an automatic ammonia injection control system, continuous emission monitoring systems (CEMS), data acquisition and recording systems (DAS); waste heat recovery system including a combined steam turbine/generator set providing a combined total electrical power output of 49.8 MW. EAD8/14/97 NO APP GDS 7/16/98 970889

The facility had a permit that was retired on November 1st, 2022, per the facility's request, as listed in the table below:

Permit Number	Equipment Description
APCD1999-PTO-960443	STEAM BOILER: 14.6 MILLION BTU/HR HEAT INPUT, SELLERS ENGINEERING CO., MODEL 350HP-SH-LN390, SERIAL NUMBER 101539 WITH A NATURAL GAS FIRED LOW NOX BURNER. APP#960443 GDS 2/99

4. Compliance History

The facility is in compliance with all the conditions on the permit. There have been no compliance actions at this facility since the issuance of initial Title V permit.

5. Title V Applicability & Acid Rain

The facility is subject to the acid rain provisions under District Rule 1412 and Title IV of the federal CAA, as given at 40 Code of Federal Regulation (CFR Subpart C, Part 72.6(a)). Under the acid rain program, an “affected” source (a term specifically defined in Title IV of the CAA, and which applies to this facility) is subject to Title V permitting pursuant to District Rule 1401 and 40 CFR Subpart C, Part 70.3(a)(4).

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

6. Potential to Emit and Actual Emissions

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

Potential to Emit Tons per Year				
Pollutant	Thresholds	Facility Actual Emissions*	Facility Potential to Emit**	Major Source
Highest Federal HAP	10	< 10	1.26	No
Sum of Federal HAPs	25	<25	1.77	No
NOx	25	1.4	46.3	Yes
VOC	25	0.2	3.7	No
PM10	100	1.7	11.7	No
SOx	100	<0.05	3.7	No
CO	100	2.21	99.5	No

*The actual emissions are from the District’s latest approved emissions inventory (CTR 2021).

**PTE are from most recent approved permit application (APP-004597)

7. 40 CFR Part 64 CAM (Compliance Assurance Monitoring)

Pursuant to New Source Review (NSR) the turbines are required to operate and maintain the CEMS to measure NOx and CO, which is also required by District Rules 69.3.1, and 40 CFR 60 Subpart KKKK. Monitoring and testing are required in the existing District permits. For the related Title V permit, additional recordkeeping and reporting are required pursuant to District Rule 1421. The emission unit has an uncontrolled PTE for NOx and CO in excess of the major source thresholds. For this reason, Compliance Assurance Monitoring (CAM) under 40 CFR Part 64 was considered for this review.

§ 64.2 (b)(vi) specifies that the requirements of Part 64 shall not apply to emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method, as defined in § 64.1. Both the District and Federal operating permits require the turbines to be equipped with Continuous Emissions Monitoring Systems (CEMS), which meets the definition for a continuous compliance determination method, as it is used to determine compliance with an emission limitation or standard on a continuous basis and provides the data in units of the standard or is correlated directly with the compliance limit. Therefore, these units are exempt from the requirements of 40 CFR 64, pursuant to § 64.2 (b)(vi).

8. Applicable Requirements

General Permit Program Applicable Requirements

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

Facility-wide/Other Prohibitory and Miscellaneous Requirements

Regulation	Rule Citation	Regulation
SDCAPCD Reg. II	19.2	Continuous Emission Monitoring Systems
SDCAPCD Reg. IV	50	Visible Emissions
SDCAPCD Reg. IV	51	Nuisance
SDCAPCD Reg. IV	52	Particulate Matter
SDCAPCD Reg. IV	53	Specific Contaminants
SDCAPCD Reg. IV	62	Sulfur Content of Fuels
SDCAPCD Reg. IV	67.0.1	Architectural Coatings
SDCAPCD Reg. IV	67.17	Storage of Organic Materials Containing VOC
SDCAPCD Reg. XII	1200	Toxic Air Contaminants – New Source Review

SDCAPCD Reg. XII	1206*	Asbestos Removal, Renovation, and Demolition
40 CFR Part 60	Subpart A	NSPS General Provisions
40 CFR Part 63	Subpart A	NESHAP General Provisions
40 CFR Part 61	Subpart M*	NESHAP - Asbestos
40 CFR Part 73	Part 73	Sulfur Dioxide Allowance System
40 CFR Part 74	Part 74	Acid Rain

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

Permit Specific Applicable Requirements:

SDAPCD Permit No.	Permit Description	Applicable Rules
APCD2001-PTO-911504	Combined Cycle Cogeneration Gas Turbine: GE LM6000 combustion turbine/generator set, rated at 42.4 MW (404.8 MM BTU/HR HHV), with water injection, fueled with natural gas only, one (1) selective catalytic reduction (SCR) unit including an automatic ammonia injection control system, continuous emission monitoring systems (CEMS), data acquisition and recording systems (DAS); waste heat recovery system including a combined steam turbine/generator set providing a combined total electrical power output of 49.8 MW. EAD8/14/97 NO APP GDS 7/16/98 970889	SDAPCD Reg. IV, Rules 50, 51,52, 53, 62, 69.3.1., 40 CFR 60-Subpart GG

Primary Limiting Regulations: Turbine set

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

PM10	Rule 20.2; Rule 53 (PM)
Toxic Pollutants	Rule 1200

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

This action, a renewal of the Title V permit, did not result in any changes in emissions, but the revised permit incorporates a number of minor revisions as follows.

- a. Removal of the retired boiler permit
- b. Correction of Rule tables to remove outdated rules and better reflect applicability of general requirements

10. Multiple Applicable Requirement Streamlining

The facility does not request Multiple Applicable Requirements Streamlining. The applicant does not request any multiple applicable requirements streamlining for this renewal application.

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

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

11. Permit Shield

The facility has requested to maintain the currently existing permit shields and hasn't requested any additional. The evaluation of the permit shield requests, that were granted, from the initial application statement of basis are described below. The only revision to the previous determination is the removal of references to Rule 69.3 since it was superseded by Rule 69.3.1 and the shields granted to 69.3.1 requirements cover those requirements.

1. Request: Rule 69.3.1(b)(3)(i) and (d)(1)

This request is for a permit shield from prohibitory rule emission limits for NO_x that are less stringent than the BACT NO_x emission limit described in the permit for the gas turbine. The District agrees with this request in part – noting that Rule 69.3.1(b)(3)(i) is actually an exemption from meeting emission limits during startups and, therefore, a shield from this requirement is counter-intuitive. Granted permit shield: Rule 69.3.1(d)(1).

2. Request: 40 CFR 60.333

The request is for a shield from fuel sulfur content limits contained in NSPS subpart GG due to this requirement being subsumed by more stringent requirements. The District agrees with granting a permit shield from this requirement, although notes that the most stringent requirement is the BACT imposed limit to use only pipeline quality natural gas (not Rule 62).
Granted permit shield: 40 CFR 60.333.

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

Before issuing the final permit, The District will provide the opportunity for review by EPA and affected states and a public notice period. Notice will be provided to the EPA electronically through the EPS and will be sent electronically to affected states and tribes. The public notice and associated documents will be provided on our website and the public notice will be published in a newspaper. The District will incorporate any suggested changes made by EPA.

13. Recommendations

The facility is expected to comply with all applicable requirements including those cited in the current District permit as well as those under District Rule 1401 and 40 CFR Part 70. Therefore, the recommendation of this report is for the subject proposed renewal Title V permit to be issued following public notice, EPA review and response to any comments.

14. Attachments

The following are attached:

- Application Package
- Draft Title V Permit
- Public Notice