

**STATEMENT OF BASIS  
Title V Permit Renewal**

**Facility Name:** Wildflower Energy LP / Larkspur

**Title V App. Number:** APCD2020-APP-006330

**Title V Permit Number:** APCD2007-TVP-978248

**Facility ID:** APCD2001-SITE-04109

**Equipment Address:** 9355 Otay Mesa Road, San Diego, CA 92154

**Facility Contact:** Michael Carpenter – Plant Manager  
Michael Noll - O & M Manager  
Wayne Forsyth - Program Manager, EHS & Regulatory

**Contact Phone:** (619) 517-6781

**Permit Engineer:** Camqui Nguyen

**Date:**

X

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Nicholas Horres  
Senior Engineer

**Senior Engineer:**

**1.0 Type of Action and Summary of Changes**

This application was submitted to renew Title V Permit APCD2007-TVP-978248.

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

The renewal application was received on 6/11/2020. This renewal application was submitted at least 12 months but not more than 18 months prior to permit expiration, in accordance with Rule 1410. Therefore, the renewal application is timely.

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

<b>Title V Application History Since Initial Title V Permit</b>				
<b>Application Number</b>	<b>Title V Permit Number</b>	<b>Application Description</b>	<b>Equipment</b>	<b>Outcome</b>
APCD2002-APP-978248	APCD2007-TVP-978248	Initial Title V permit application	Combustion turbine	Approved
APCD2005-APP-983831	APCD2007-TVP-978248	Revised source test conditions	Combustion turbines	Approved
APCD2007-APP-985352	APCD2007-TVP-978248	Change contact name	Combustion turbines	Approved
APCD2007-APP-985991	APCD2007-TVP-978248	Revised NOx emission averaging period	Combustion turbines	Approved
APCD2009-APP-987854	APCD2007-TVP-978248	Permit renewal	Combustion turbines	Approved
APCD2021-APP-002426	APCD2007-TVP-978248	Change contact name	Combustion turbines	Approved
APCD2014-APP-003726	APCD2007-TVP-978248	Change contact name	Combustion turbines	Approved
APCD2015-APP-004052	APCD2007-TVP-978248	Permit renewal	Combustion turbines	Approved
APCD2020-APP-006330	APCD2007-TVP-978248	Permit renewal (this application)	Combustion turbines	Pending

Since the previous renewal, the District has not received any application from this facility.

### **3.0 Facility Description**

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

<b>Permit Number</b>	<b>Equipment Description</b>
APCD2009-PTO-976138	Gas Turbine #200 (East): GENERAL ELECTRIC 45 MW NOMINALLY RATED MODEL LM 6000 PC SPRINT SIMPLE CYCLE GAS TURBINE WITH A HEAT INPUT RATING OF 395 MM BTU/HR (LHV) WHEN OPERATED ON NATURAL GAS AND 398 MM BTU/HR (LHV) WHEN OPERATED ON LIQUID FUEL, EQUIPPED WITH A WATER INJECTION SYSTEM AND CORMETECH SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM INCLUDING AUTOMATIC AMMONIA INJECTION CONTROL SYSTEM FOR CONTROL OF NOX, CONTINUOUS EMISSIONS MONITORING SYSTEM (CEMS), DATA

	ACQUISITION AND RECORDING SYSTEMS AND THE OPTION OF AN OXIDATION CATALYST SYSTEM: THE COMBINED TOTAL ELECTRICAL NOMINAL POWER OUTPUT FROM THE LARKSPUR POWER PLANT, INCLUDING THE POWER FROM UNIT 100 AND UNIT 200 IS 90 MW.
APCD2009-PTO-976094	GAS TURBINE #100 (WEST): GENERAL ELECTRIC 45 MW NOMINALLY RATED MODEL LM 6000 PC SPRINT SIMPLECYCLE GAS TURBINE WITH A HEAT INPUT RATING OF 395 MM BTU/HR (LHV) WHEN OPERATED ON NATURAL GAS AND 398 MM BTU/HR (LHV) WHEN OPERATED ON LIQUID FUEL, EQUIPPED WITH A WATER INJECTION SYSTEM AND CORMETECH SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM INCLUDING AUTOMATIC AMMONIA INJECTION CONTROL SYSTEM FOR CONTROL OF NOX, CONTINUOUS EMISSIONS MONITORING SYSTEM (CEMS), DATA ACQUISITION AND RECORDING SYSTEMS AND THE OPTION OF AN OXIDATION CATALYST SYSTEM; THE COMBINED TOTAL ELECTRICAL NOMINAL POWER OUTPUT FROM THE LARKSPUR POWER PLANT, INCLUDES POWER FROM UNIT 100 AND UNIT 200 IS 90 MW.

#### 4.0 Title V Applicability & Acid Rain

The Title V regulation applies to any stationary source that is a major stationary source as defined in Rule 1401(c)(26) or is subject to the acid rain provisions of Title IV of the federal Clean Air Act (CAA). Larkspur Energy Facility is a major source for NOx and CO. The facility is subject to the acid rain program under Title IV of the federal Clean Air Act (CAA) which requires Title V permitting pursuant to 40 CFR § 70.3.

#### 5.0 Potential to Emit and Actual Emissions

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

Title V Major Source Determination Tons per Year:				
Pollutant	Thresholds	Facility Actual Emissions	Facility Potential to Emit	Major Source
Highest Federal HAP	10	1.09		
Sum of Federal HAPs	25	1.24		
NOx	25*	2.79	50	Yes
VOC	25*	1.66	9.64	No
PM10	100	3.24	29.39	No
SOx	100	0.09	16.59	No
CO	100	1.60	250	Yes

Facility actual emissions are based on Emission Inventory report for 2021.  
NOx and CO potential emissions are based on permit condition limits.  
VOC and PM10 potential emissions are from emission calculation for Application 976094. SOx emission is based on sulfur content of 0.75 gr Sulfur per 100 scft natural gas.

\*District rules currently define the major source threshold as 100 tpy for NOx and VOC; however, due to redesignation as Severe ozone nonattainment, the District has submitted a revised rule to lower the thresholds to 25 tpy for these pollutants. The revised thresholds will become effective on EPA approval which is expected soon after the permit is finalized.

## 6.0 **40 CFR Part 64 CAM (Compliance Assurance Monitoring)**

Pursuant to New Source Review (NSR) the turbines are required to operate and maintain the CEMS to measure NOx and CO, which is also required by District Rules 69.3.1, and 40 CFR 60 Subpart KKKK. Monitoring and testing are required in the existing District permits. For the related Title V permit, additional recordkeeping and reporting are required pursuant to District Rule 1421. Compliance Assurance Monitoring (CAM) under 40 CFR Part 64 was considered for this review. None of the emission units fulfill the criteria for applicability under Part 64. Additionally, the turbines are equipped with continuous emissions monitoring systems (CEMS), which also excludes them from being subject to CAM under § 64.2 (b)(vi).

## 7.0 **Applicable Requirements**

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

### General Permit Program Applicable Requirements

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

Facility-wide/Other Prohibitory & Misc. Requirements

<b>Regulation</b>	<b>Rule Citation</b>	<b>Title</b>
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. IV	71	Abrasive Blasting
SDCAPCD Reg. XII	1200	Toxic Air Contaminants – New Source Review
SDCAPCD Reg. XII	1206*	Asbestos Removal, Renovation, and Demolition
40 CFR Part 60	Subpart A	NSPS General Provisions
40 CFR Part 63	Subpart A	NESHAP General Provisions
40 CFR Part 61	Subpart M*	NESHAP - Asbestos
40 CFR Part 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:

<b>SDAPCD Permit No.</b>	<b>Title V Permit No.</b>	<b>Permit Description</b>	<b>Applicable Rules</b>
APCD2009-PTO-976138	APCD2007-TVP-978248	Gas Turbine #200 (East): GENERAL ELECTRIC 45 MW NOMINALLY RATED MODEL LM 6000 PC SPRINT SIMPLE CYCLE GAS TURBINE WITH A HEAT INPUT RATING OF 395 MM BTU/HR (LHV) WHEN OPERATED ON NATURAL GAS AND 398 MM BTU/HR (LHV) WHEN OPERATED ON LIQUID FUEL, EQUIPPED WITH A WATER INJECTION SYSTEM AND CORMETECH SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM INCLUDING AUTOMATIC AMMONIA INJECTION CONTROL SYSTEM FOR CONTROL OF NOX, CONTINUOUS EMISSIONS MONITORING SYSTEM (CEMS), DATA ACQUISITION AND RECORDING SYSTEMS AND THE OPTION OF AN OXIDATION CATALYST SYSTEM: THE COMBINED TOTAL ELECTRICAL NOMINAL POWER OUTPUT FROM THE	50 51 53 68 69.3.1 20.3 1200 40 CFR-Part 60_Subpart K K K K

		LARKSPUR POWER PLANT, INCLUDING THE POWER FROM UNIT 100 AND UNIT 200 IS 90 MW.	
APCD2009-PTO-976094	APCD2007-TVP-978248	GAS TURBINE #100 (WEST): GENERAL ELECTRIC 45 MW NOMINALLY RATED MODEL LM 6000 PC SPRINT SIMPLECYCLE GAS TURBINE WITH A HEAT INPUT RATING OF 395 MM BTU/HR (LHV) WHEN OPERATED ON NATURAL GAS AND 398 MM BTU/HR (LHV) WHEN OPERATED ON LIQUID FUEL, EQUIPPED WITH A WATER INJECTION SYSTEM AND CORMETECH SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM INCLUDING AUTOMATIC AMMONIA INJECTION CONTROL SYSTEM FOR CONTROL OF NOX, CONTINUOUS EMISSIONS MONITORING SYSTEM (CEMS), DATA ACQUISITION AND RECORDING SYSTEMS AND THE OPTION OF AN OXIDATION CATALYST SYSTEM; THE COMBINED TOTAL ELECTRICAL NOMINAL POWER OUTPUT FROM THE LARKSPUR POWER PLANT, INCLUDES POWER FROM UNIT 100 AND UNIT 200 IS 90 MW.	50 51 53 68 69.3.1 20.3 1200 40 CFR-Part 60_Subpart K K K K

Emission Limitations

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

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

**8.0 Updates to the Title V Permit Incorporated into this Action**

Asides from administrative changes to contact information, there has not been any updates to the Title V Permit to be incorporated into this action.

## **9.0 Multiple Applicable Requirement Streamlining**

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

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

## **10. Permit Shield**

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

The applicant does not request any permit shield for this permit renewal application.

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

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

## **12. Recommendations**

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

## **13. Attachments**

The following are attached:

- Application Package
- Draft Permit
- Public Notice









