



Air Pollution Control Board

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September 26, 2008

NOTICE OF WORKSHOP

TO DISCUSS PROPOSED REGULATION X AND APPENDIX C AMENDMENTS ADOPTION BY REFERENCE OF NEW SOURCE PERFORMANCE STANDARDS (NSPS) SUBPART GG – STANDARDS OF PERFORMANCE FOR STATIONARY GAS TURBINES SUBPART KKKK – STANDARDS OF PERFORMANCE FOR COMBUSTION TURBINES

The San Diego County Air Pollution Control District (District) will hold a public workshop to consider comments concerning the proposed adoption by reference of the existing New Source Performance Standards (NSPS) – Subpart GG (Standards of Performance for Stationary Gas Turbines) and Subpart KKKK (Standards of Performance for Combustion Turbines).

Comments concerning this proposal may be submitted in writing before, or made at, the workshop which is scheduled as follows:

DATE: Monday, November 3, 2008

TIME: 9:00 a.m. to 11:00 a.m.

PLACE: San Diego County Air Pollution Control District
Main Conference Room
10124 Old Grove Road
San Diego, CA 92131

New Source Performance Standards (NSPS) are promulgated under 40 Code of Federal Regulations (CFR) Part 60 as Subparts by the Environmental Protection Agency (EPA) and apply throughout the country. The Subparts are then adopted by the District to allow local implementation. The District proposes to adopt, by reference, the current federal NSPS version of Subpart KKKK and readopt, by reference, the most current federal NSPS version of Subpart GG. Regulation X – Standards of Performance for New Stationary Sources will be amended to include the Federal Register citation of the original federal Subparts and their subsequent amendments, and submitted to the San Diego County Air Pollution Control Board for adoption at a public hearing. Following adoption, the District will request EPA delegation to implement and enforce the most recent federal version of each Subpart.

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Subparts GG and KKKK both apply to combustion turbines and establish emission limits for nitrogen oxides (NO_x) and sulfur dioxides (SO₂). Subpart KKKK, applicable to new turbines, reflects changes in NO_x emission control technologies and turbine design, since the emission standards in Subpart GG, applicable to existing turbines, have remained relatively unchanged since it was first promulgated in 1979. Subpart KKKK applies to turbines built after February 18, 2005, and Subpart GG applies to turbines built prior to that date. Most other requirements including reporting, recordkeeping, and test methods remain the same between the two regulations.

SUBPART GG

Subpart GG – Standards of Performance for Stationary Gas Turbines was first promulgated by the EPA on September 10, 1979, and subsequently adopted with minor modifications by the District into Regulation X (Regulation X, Subpart GG). The District petitioned EPA for delegation and received authority to implement and enforce Regulation X, Subpart GG, on May 24, 1982. EPA had amended Subpart GG several times since its original promulgation, causing the Regulation X version of the Subpart to become outdated. To correct this problem, the District repealed the Regulation X version of Subpart GG and adopted, by reference, the updated federal version of Subpart GG on October 17, 2001, and received delegation from EPA on January 3, 2008. EPA has amended Subpart GG several times since October 17, 2001, causing the current Regulation X version to become outdated. The District proposes to readopt, by reference, Subpart GG to update Regulation X to the most current federal version.

NSPS Subpart GG applies to stationary gas turbines with a heat input at peak load equal to or greater than 10 million British Thermal Unit (Btu) per hour which commenced construction, modification, or reconstruction after October 3, 1977. Federal Subpart GG was most recently modified to add additional alternative testing and monitoring procedures, and to harmonize the provisions of Subpart GG with the monitoring provisions of 40 CFR Part 75, the continuous emission monitoring requirements of the federal acid rain program.

Since EPA originally promulgated Subpart GG, there have been many advances in the design of the NO_x emission controls used in gas turbines. Therefore, EPA amended the regulation to allow continuous emission monitoring systems (CEMS) to demonstrate compliance. EPA has also amended the requirement to monitor the nitrogen content of the fuel only if the facility claims an allowance for fuel-bound nitrogen. The sampling frequency for determining nitrogen and sulfur content of fuel oil has also been amended. A definition has been added for natural gas and test methods updated.

There are no changes to the emission standards for NO_x or SO₂ between the District's Regulation X version and current federal version.

SUBPART KKKK

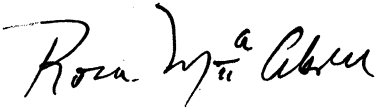
Subpart KKKK – Standards of Performance for Combustion Turbines was first promulgated by EPA on July 6, 2006. The District proposes to adopt, by reference, Subpart KKKK and add to Regulation X and Appendix C the current federal version.

NSPS Subpart KKKK applies to stationary combustion turbines with a heat input at peak load equal to or greater than 10 million Btu per hour, which commenced construction, modification, or reconstruction after February 18, 2005. Combustion turbines subject to NSPS Subpart KKKK are exempt from Subparts GG, Da, Db, and Dc. Combustion turbine test cells/stands and turbines at integrated gasification combine cycle electric utility steam generating units subject to NSPS Subpart Da are exempt from all requirements of Subpart KKKK. Emergency combustion turbines and turbines used in research and development are exempt only from the NO_x emission limits of Subpart KKKK.

Combustion turbines applicable to Subpart KKKK must meet the emission limits for the regulated pollutants NO_x and SO₂. The NSPS establishes 14 subcategories of turbines based on fuel type and turbine size, and each subcategory has a different NO_x emission limit. The emission limit standards also allow the turbine owner or operator the choice of a concentration-based (ppm) or output-based standard (lb/MWh). See Table 1 of the NSPS for these limits.

Subpart KKKK requires emissions monitoring, source testing, and reporting to demonstrate compliance with the emission limits. The rule intends to harmonize the monitoring and quality assurance provisions of Subpart KKKK with the provisions of 40 CFR Part 75, the continuous emission monitoring requirements of the federal acid rain program, similar to changes made to Subpart GG.

If you would like a copy of the current federal version of Subpart GG or KKKK, please visit the District's Website at www.sdapcd.org, under Rules and Regulations, Public Workshops, or contact Janet McCue at (858) 586-2712. If you have any questions concerning this proposal, please contact Cara Bandera at (858) 586-2751.



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RMA:CB:jlmm