

**AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO**

**ADOPTION BY REFERENCE OF
TITLE 40 CODE OF FEDERAL REGULATION (CFR) PART 60
NEW SOURCE PERFORMANCE STANDARDS (NSPS):**

**SUBPART GG – STANDARDS OF PERFORMANCE FOR STATIONARY GAS TURBINES
SUBPART KKKK – STANDARDS OF PERFORMANCE FOR COMBUSTION TURBINES**

WORKSHOP REPORT

A workshop notice was mailed to 35 facilities in San Diego County that are subject to 40 Code of Federal Regulations (CFR) Part 60, Subpart GG – Standards of Performance for Stationary Gas Turbines or Subpart KKKK – Standards of Performance for Combustion Turbines. Notices were also mailed to all Economic Development Corporations and Chambers of Commerce in San Diego County, the U.S. Environmental Protection Agency, the California Air Resources Board, and other interested parties.

The workshop was held on November 3, 2008, and 11 members of the public attended. Comments were received during the workshop regarding adoption by reference of the two above listed NSPSs.

The comments and District responses are as follows:

1. WORKSHOP COMMENT

NSPS Subpart KKKK allows the performance testing frequency for nitrogen oxide (NO_x) emissions to be reduced to once every two years if performance test results are equal to or less than 75% of the applicable NO_x emission limit. Is this the applicable emission limit as required in the NSPS or the NO_x limit as stated on the District permit for the turbine?

DISTRICT RESPONSE

NSPS Subpart KKKK allows the frequency of source testing to be reduced to once every two years if the performance test results are equal to or less than 75% of the applicable NO_x emission limit as required in the NSPS. Even if the NO_x emission limit as required in the turbine's permit is less than the NSPS limit, this standard still refers to the applicable NSPS emission limit. However, District Rule 69.3.1 requires an annual performance test unless otherwise specified by the Air Pollution Control Officer. The District does not currently plan to reduce performance testing frequency as allowed by the NSPS.

2. WORKSHOP COMMENT

How often must periodic fuel testing for sulfur content be conducted?

DISTRICT RESPONSE

An owner or operator may elect not to monitor total sulfur content of the fuel combusted in the turbine, if the fuel is demonstrated not to exceed potential sulfur emissions of 0.06 pounds of sulfur dioxide (SO₂) per million British thermal units heat input. This can be demonstrated by verifying that the maximum total sulfur content for fuel oil is 0.05 weight percent or less, or for natural gas is 20 grains of sulfur or less per 100 standard cubic feet for natural gas. If an operator/owner elects not to demonstrate that sulfur content is below the above listed thresholds, then for gaseous fuel, the sulfur content of the fuel must be determined and recorded once per unit operating day. For fuel oil, use one of the sampling options and associated sampling frequencies described in Appendix D of 40 CFR Part 75.

3. WORKSHOP COMMENT

Is the 30-day rolling average for combined cycle or combined heat and power turbines used in determining excess NO_x emissions for turbines based on the Subpart KKKK limit or the NO_x limit as stated on the District permit for the turbine?

DISTRICT RESPONSE

Excess emissions are identified relative to the Subpart KKKK applicable emission limit and would not reflect lower emission limits as stated on the District permit.

4. WORKSHOP COMMENT

Is District Rule 69.3.1 more stringent than Subpart KKKK for new turbines? Are facilities responsible for compliance with both Rule 69.3.1 and NSPS Subpart KKKK or Subpart GG?

DISTRICT RESPONSE

District Rule 69.3.1 satisfies California Clean Air Act requirements and, in general, is more stringent than Subpart KKKK for new turbines. Facilities are responsible for complying with both Rule 69.3.1 and NSPS Subpart KKKK or Subpart GG, as applicable.