

**TITLE V OPERATING PERMIT
STATEMENT OF BASIS**

Facility Name: Cabrillo Power I LLC

Title V Application Number: APCD2018-APP-005404

Facility ID: APCD1982-SITE-00195

Equipment Address: 4600 Carlsbad Blvd
Carlsbad, CA. 92008

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Permit Engineer: Doug Erwin

1.0 Introduction & Facility Description

This statement of basis describes the renewal of Title V permit (record#) APCD2003-TVP-974488 covering the below listed emission units at Cabrillo Power I LLC. The most recent emissions inventory data indicates the facility is a major source for carbon monoxide (CO); and the facility's boilers are also subject to the acid rain requirements under 40 CFR §§ 72 through 78, which also requires a Title V permit.

Emission units (EUs) at Cabrillo Power comprise the following:

Facility Emission Units (EUs)

EU Reference (PTO#)	Process	Description
792	Utility Boiler #2	1013 MMBtu/hr input, natural gas, with SCR (aqueous ammonia); with CEMS
793	Utility Boiler #3	1128 MMBtu/hr input, natural gas, with SCR (aqueous ammonia); with CEMS
1267	Gas Turbine	317 MMBtu input capacity, natural gas
1770	Utility Boiler #4	3245 MMBtu/hr input, natural gas, with SCR (aqueous ammonia); with CEMS
5238	Utility Boiler #5	3475 MMBtu/hr input, natural gas, with SCR (aqueous ammonia); with CEMS

20446	Metal Parts Coating	Coating application station, Bleeker Bros., booth, 12W x 20L x 10H (feet), 3 hp exhaust fan, with filters; HVPL spray
920894	Emergency Engine	Caterpillar, 156 bhp, diesel with 100 kW generator
961265	Marine Coating	Outdoor coating operation with one HVLP gun and one airless gun, brushes and rollers, and non-chrome pigmented Rule 67.18 compliant coatings
970274	Limited Use Engine	Cummins Diesel, 265 bhp, used as a gas turbine starter engine
960330	Registered Engine	Cummins 225 bhp, diesel, driving the emergency standby flood pump for Encina units 4 & 5 sub-basements.

2.0 Title IV (Acid Rain) and Title V Permitting

The boilers at Cabrillo Power are subject to the acid rain provisions under Title IV of the Federal CAA as given at District Rule 1412 and 40 Code of Federal Regulation (CFR) § 72.6(a). Under the acid rain program, an *affected source* (a defined term which applies to this facility) is subject to Title V permitting pursuant to District Rule 1401 and 40 CFR § 70.3(a)(4).

3.0 Permit Actions for the Previous 5-year Cycle

Only one Title V permit application was submitted during the previous 5-year permit cycle, this being for an administrative amendment for a name change appearing only on the permit cover page.

4.0 Applicable Requirements

The following table summarizes the applicable requirements that account for most of the regulatory authority at this facility, and is followed by a discussion of the most notable of these requirements.

Pollutant / Coverage	Primary Regulation(s)
NOx	Rule 20.3 (NSR); Rule 69.3; Rule 69.3.1; Rule 69.4; Rule 69.4.1; 40 CFR 60 Subpart KKKK; ATCM CCR 17 § 93115; ATCM CCR 17 § 93115.8
SO2	Rule 20.3; Rule 62; Rule 53; 40 CFR 60 Subpart KKKK
VOC	Rule 20.3; Rule 67.3; Rule 67.18; ATCM CCR 17 §§ 93115 and 93115.8
CO	Rule 20.3; Rules 69.3, 69.3.1, 69.4, 69.4.1; ATCM CCR 17 §§ 93115 and 93115.8
PM10	Rule 20.3; Rule 53; ATCM CCR §§ 93115 and 93115.8

Toxic Pollutants	Rule 1200; 40 CFR 63 Subparts MMMM, ZZZZ, and HHHHHH; ATCM CCR 17 §§ 93115 and 93115.8
Visible Emissions	Rule 50
Nuisance	Rule 51

6.0 Monitoring, Recordkeeping and Reporting

Monitoring, recordkeeping and reporting (MRR) requirements are included in all of the PTOs with the specific nature of the requirements dependent on the EU type.

The consideration of Compliance Assurance Monitoring (CAM) under 40 CFR Part 64 serves to illuminate the MRR within each EU. Based on the content of each PTO, it appears CAM was considered during a previous renewal, or during the original Title V review. However, the following table summarizes its applicability and the basis of CAM determinations for each EU.

Permit#	EU Type	Does CAM Apply?	Reason for CAM Determination
792	Boiler	No	Exempt – EU subject to Acid Rain
793	Boiler	No	Exempt – EU subject to Acid Rain
1267	Turbine	Yes	Satisfies CAM applicability criteria; complies, EU equipped with a CEMS
1770	Boiler	No	Exempt – EU subject to Acid Rain
5238	Boiler	No	Exempt – EU subject to Acid Rain
20446	Metal Parts Coating	No	EU fails to meet one or more of the applicability criteria under Part 64
920894	Emergency Engine	No	Exempt – EU subject to a NESHAP under Section 112 of the CAA
961265	Marine Coating	No	EU fails to meet one or more of the applicability criteria under Part 64
970274	Limited Use Engine	No	Exempt – EU subject to a NESHAP under Section 112 of the CAA
960330	Registered Engine	No	Exempt – EU subject to a NESHAP under Section 112 of the CAA

7.0 Permit Shield

Pursuant to Rule 1410 § (p), a source may request a permit shield which precludes enforcement for certain requirements such as requirements deemed inapplicable or for requirements for which compliance is met by complying with a more stringent standard. No permit shield was requested for this renewal, therefore none was included in the permit.

8.0 Outside Review

Pursuant to Rule 1415, the District is submitting the proposed draft permit for public notice and review by EPA Region 9 and affected states.

9.0 Conclusions / Recommendations

The source is expected to comply with all applicable requirements. Therefore, the recommendation of this report is for the subject renewal Title V permit to be issued following public notice and EPA review.