SDGE®

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September 12, 2017

Mr. Douglas Erwin
Senior Air Quality Engineer
San Diego County Air Pollution Control District
10124 Old Grove Road
San Diego, CA 92131-1649

SUBJECT: Title V Permit Renewal Application
San Diego Gas & Electric, Palomar Energy Center

Dear Mr. Erwin:

San Diego Gas & Electric Company ("SDG&E") is hereby submitting a renewal application for the Part 70 (Title V) Operating Permit (APCD2013-TVP-00038) for its Palomar Energy Center (PEC) located at 2300 Harveson Place, Escondido, California 92029. The Title V permit expires on October 3, 2018. According to Section I.B.1 of the permit, a Title V renewal application must be submitted to the San Diego Air Pollution Control District ("District") no later than October 3, 2017. SDG&E is submitting the attached permit renewal application package to comply with this requirement.

We believe this application package constitutes both a timely and complete submittal to fulfill Part 70 and Regulation XIV permit renewal application requirements. The forms and attachments included for your review are provided in accordance with guidance from the District and includes the Responsible Official's Certification. The forms included are as follows:

- 1401-A1 & A2 Stationary Source Summary
- 1401-G Insignificant Activity List
- 1401-H1 Applicable Requirements Summary Check List
- 1401-H2 List of Permits by Equipment Category
- 1401-I Certification Statement
- 1401-O Multiple Applicable Requirements Streamlining (MARS)
    - 1401-O Details on Attachment O-1 (Table 1)
- 1401-Q Request for Permit Shield
- 1401-M List of Abatement Devices
- Additional Greenhouse Gas Potential Calculations

SDG&E has also included greenhouse gas (GHG) potential to emit calculations from the plant to address applicability of PEC to EPA's PSD and Title V GHG Tailoring Rule.

A check in the amount of $8,945 is also being submitted (pursuant to the Title V permit renewal application fee estimate provided by the District).

If you have any questions regarding this application please contact me at (858) 654-1658 (email: byim@semprautilities.com).

Sincerely,

Brian Yim
Senior Environmental Specialist

Enclosures

cc: Carl LaPeter (SDG&E)
Charles Hardman (SDG&E)
Jason Bowman (SDG&E)
Moses Peram (SDG&E)
Hashim Navrozali (SDG&E)

San Diego County Air Pollution Control District
10124 Old Grove Road San Diego CA 92131-1649
(858) 586-2600 FAX (858) 586-2601

TITLE V APPLICATION
Stationary Source Summary (FORM 1401-A1)

Company Name	District Use Only
San Diego Gas & Electric (Electric Generation)	NEDS # _____ SITE ID # _____

I. FACILITY IDENTIFICATION

1. Facility Name (if different than company name): Palomar Energy Center (PEC)
2. Four digit SIC Code: 4931
3. Parent Company (if different than Company Name): N/A
4. Mailing Address: 2300 Harveson Place, SD 1473
   City Escondido State CA Zip 92029
5. Street Address or Source Location: 2300 Harveson Place, SD1473
   City Escondido State CA Zip 92029
6. UTM Coordinates: UTM 11 489146E, 3664504 N (NAD27)
7. Source Located within 50 miles of a state line: ☐ Yes ☒ No (All sources **are** within 50 miles)
8. Source Located within 1000 feet of a school: ☐ Yes ☒ No
9. Type of Organization: ☒ Corporation ☐ Sole Ownership ☐ Government ☐ Partnership ☒ Utility Company
10. Legal Owner's Name: San Diego Gas & Electric
11. Owner's Agent name (if any): N/A
12. Responsible Official: Carl LaPeter
13. Plant Site Manager/Contact: Moses Peram Phone #: 760-432-2507 FAX #: 760-432-2510
14. Application Contact: Brian Yim, SDG&E (Tel: 858-654-1658)
15. Type of Facility: Electric Generation
16. General description of processes/products: Electric Generation, 2 GE Frame 7FA combustion turbine generators with heat recovery steam generators; emergency natural gas generator.
17. Is a Federal Risk Management Plan (RMP) pursuant to Section 112(r) required? ☒ Yes ☐ No
    (If application is submitted after RMP due date, attach verification that plan is registered with the appropriate agency.)

II. TYPE OF PERMIT ACTION (check)	CURRENT PERMIT (permit number)	EXPIRATION (date)
☐ Initial Title V Application	N/A	N/A
☒ Permit Renewal	00038	October 3, 2018
☐ Significant Permit Modification		
☐ Minor Permit Modification		
☐ Administrative Amendment		

III. DESCRIPTION OF PERMIT ACTION

1. Does the permit action requested involve:
   ☐ Temporary Source ☐ Voluntary Emissions Caps
   ☒ Acid Rain Source ☐ Alternative Operating Scenarios ☒ Abatement Devices
   ☒ CEMs ☒ Permit Shield
   ☐ Outdated SIP Requirement Streamlining ☒ Multiple Applicable Requirement Streamlining
   ☐ Source Subject to MACT Requirements [Section 112]
   ☐ Source Subject to Enhanced Monitoring (40CFR64) [Compliance Assurance Monitoring]
2. Is source operating under a Compliance Schedule? ☐ Yes ☒ No ☐ Proposed
3. Is source operating under a Variance ☐ Yes ☒ No (If Yes, please attach variance information)
4. For permit modification, provide a general description of the proposed permit modification:
   N/A

IV. SUPPLEMENTAL ATTACHMENTS*: A2, G, H1, H2, I, M, O (& Att. O-1), Q, support info.

* Means all attachments to the complete application.

San Diego County Air Pollution Control District
10124 Old Grove Road San Diego CA 92131-1649
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TITLE V APPLICATION
Stationary Source Summary (FORM 1401-A2)

Company Name	District Use Only
San Diego Gas & Electric (Electric Generation)	NEDS # _____ SITE ID # _____

I. MAJOR SOURCE APPLICABILITY

Check appropriate pollutant(s) for which you are a Major Source under Title V. Applicability is based on potential to emit. **If more space is necessary, use additional forms. Please type or print legibly.**

POLLUTANT	MAJOR SOURCE THRESHOLD TOTAL EMISSIONS, TPY	(check if appropriate)
VOC	100	☐
PM_{10}	100	☒
SO_2	100	☐
NOx	100	☒
CO	100	☒
ODC	100	☐
LEAD COMPOUNDS	10	☐
HAZARDOUS AIR POLLUTANTS		
SINGLE HAP	10	☐
		☐
		☐
COMBINATION HAP	25	☐
		☐
		☐
		☐

Attach all necessary calculations to this form as applicable. NOTE: Calculations are only needed if no Emission Inventory is on file with the District

Reference Emission Inventory Report — Inventory Year **2014**

Carl S. LaPeter
Signature of Responsible Official

11 SEP 2017
Date

Carl LaPeter
Print Name of Responsible Official

(760) 432-2503
Telephone No. of Responsible Official

Plant Manager
Title of Responsible Official

II. EMISSIONS CALCULATIONS ATTACHED (as needed) ☐ Yes ☒ No

DISTRICT USE ONLY

Date Application Received: _____ **Application #** _____

Application Filing Fee: _____ **District Received Stamp:** _____

Receipt #: _____ **Fee Code:** _____

San Diego County Air Pollution Control District
10124 Old Grove Rd., San Diego, CA 92131
(858) 586-2600 FAX (858) 586-2601

TITLE V APPLICATION
Insignificant Activity List (FORM 1401-G)

Company Name	District Use Only
San Diego Gas & Electric – Palomar Energy Center	NEDS # _____
Facility Address: 2300 Harveson Place, Escondido, CA 92029	SITE ID # _____

LIST OF EQUIPMENT – INSIGNIFICANT ACTIVITIES

Place a check mark in the appropriate box for equipment that is considered an insignificant activity based on throughput or equipment capacity.

Exemptions based on Size (Capacity)

	(Condensed Language of Rule)	Appendix A Citation
☒	Stationary & portable internal combustion engines with ≤ 50 bhp output rating	(d)(1)(iii)
☐	Stationary gas turbines with a power rating of < 0.3 megawatt (MW) or a maximum gross heat input rating of 1 million BTUs per hour	(d)(1)(iv)
☐	Water cooling towers & ponds with a capacity < 10,000 gal/min not used for evaporative cooling of process water or not used for evaporative cooling of water, contaminated water or industrial waste water from barometric jets or from barometric condensers.	(d)(2)
☐	Fuel-burning equipment with a maximum gross heat input rate of < 1 million Btu/hour when not part of a process, process line, line, equipment, article, machine or other contrivance for which a permit to operate is required by these Rules and Regulations	(d)(4)(i)
☐	Fuel burning equipment with a maximum gross heat input of < 20 million Btu/hour, and fired exclusively with natural gas and/or liquefied petroleum gas	(d)(4)(ii)
☐	Steam boilers, process heaters, and steam generators with a maximum gross heat input of < 5 million Btu/hour	(d)(4)(iii)
☐	Crucible-type or pot-type furnaces with a brimful capacity of < 450 in^3 of any molten metal	(d)(12)
☐	Crucible, pot or induction furnaces with a capacity of ≤ 2500 in^3, in which no sweating or distilling is conducted and from which only non-ferrous metals except yellow brass, are poured or non-ferrous metals are held in a molten state	(d)(13)
☒	Dry batch mixers with ≤ 0.5 cubic yards rated working capacity	(d)(27)
☒	Batch mixers (wet) with ≤ 1 cubic yard capacity where no organic solvents, diluents or thinners are used.	(d)(28)
☐	Roofing kettles (used to heat asphalt) with a capacity of ≤ 85 gallons	(d)(33)
☒	Abrasive blasting equipment with a manufacturer's-rated sand capacity of < 100 lbs or < 1 ft^3	(d)(34)
☐	Paper shredders and paper disintegrators that have a capacity of 600 pounds per hour or less, and the associated conveying systems and baling equipment.	(d)(41)
☐	Ovens having an internal volume of ≤ 27 ft^3 in which organic solvents or materials containing organic solvents are charged	(d)(59)
☐	Cold solvent cleaning tanks, vapor degreasers, and paint stripping tanks with a liquid surface area of ≤ 1.0 ft^2	(d)(61)(i)
☐	Cold solvent cleaning tanks, vapor degreasers, and paint stripping tanks which have a maximum capacity of ≤ 1 gallon	(d)(61)(ii)

Continued - Exemptions based on Size (Capacity)

	(Condensed Language of Rule)	Appendix A Citation
☒	Stationary organic compound storage tanks with a capacity of ≤ 250 gallons	(e)(1)
☐	Liquid surface coating application operations using hand-held brushes for application of a primer coating from containers of ≤ eight (8) ounces in size, to fasteners to be installed on aerospace parts	(h)(5)
☐	Liquid surface coating application operations using air brushes with a coating capacity of ≤ 2 ounces for the application of a stencil coating	(h)(6)
☐	Metal inspection tanks that: a) do not utilize a suspension of magnetic or fluorescent dye particles in volatile organic solvent, and b) have a liquid surface area < 5 ft^2 and c) are not equipped with spray type flow or a means of solvent agitation	(o)(5)
☐	Bakery ovens used for baking yeast leavened products where the combined rated heat input capacity is < 2 million Btu/hr	(o)(37)

Exemptions based on Production Rates (Emission Limits)

☐	Printing or graphic arts presses located at a stationary source which emits a total of <15 lbs/day of VOC's subject to Rule 67.16, on each day of operation	(d)(7)
☐	Solder levelers, hydrosqueegees, wave solder machines, and drag solder machines which use < 10 lbs/day of any material containing VOCs	(d)(23)
☒	Fire extinguishing equipment, using halons with a charge of < 50 lbs. of a Class I or Class II ozone depleting compound.	(d)(31)
☐	Coffee roasting equipment with a manufacturer's rating of ≤ 15 lbs/hr	(d)(45)
	Equipment used to manufacture bio-agricultural products for exclusive use in field testing required to obtain FDA, EPA, USDA and /or Cal-EPA approval, provided the uncontrolled emissions of VOCs from all such operations < 5 ton/yr.	(d)(49)(iii)
☐	Oil quenching tanks which use < 20 gal/yr of make-up oil	(d)(56)
☐	Equipment that is used to conduct research and develop new or improved processes/products, and is operated by technically trained personnel under the supervision of a research director, and is not used in the manufacture of products for sale or exchange for commercial profit, and all emissions are < 15 lbs/day.	(d)(48)
☐	Powder coating operations, except metalizing gun operations, where surface preparation or cleaning solvent usage is < 0.5 gal/day	(d)(62)
☐	Equipment used to transfer fuel to & from amphibious ships for maintenance purposes, provided total annual transfers < 60,000 gal/yr.	(f)(2)
☐	Stationary storage tanks (excluding tanks subject to Rule 61.9) used exclusively for the storage of liquid organic solvents used as dissolvers, viscosity reducers, reactants, extractants, cleaning agents or thinners provided that emissions < 15 lbs/day.	(e)(3)
☐	Liquid surface coating or adhesive application operations (portable or stationary) where not more than 20 gallons per year of material containing organic compounds are applied	(h)(1)
☐	Liquid surface coating application operations exclusively using materials with a VOC content of < 20 g/L where < 30 gal/day of such materials are applied.	(h)(2)
☐	Foam manufacturing or application operations which emit < 5 lbs/day of VOCs	(i)(1)
☐	Reinforced plastic fabrication operations using resins such as epoxy and/or polyester which emit < 5 lbs/day of VOCs	(i)(2)
☐	Plastics manufacturing or fabrication operations which emit < 5 lbs/day of VOCs	(i)(3)
☐	Cold solvent degreasers used for educational purpose and which emit < 5 lbs/day of VOCs	(i)(4)

☐	Golf grip application stations which exclusively use liquid materials with an initial boiling point of 450°F (232°C), or greater and which emit < 5 lbs/day of VOCs.	(i)(5)
☐	Batch-type waste-solvent recovery stills with batch capacity of ≤ 7.5 gallons for onsite recovery provided the still is equipped with a safety device & VOC emissions are < 5 lbs/day	(i)(6)
☐	Peptide and DNA synthesis operations which emit < 5 lbs/day of VOCs	(i)(7)
☒	Equipment used for washing or drying articles fabricated from metal, cloth, fabric or glass, provided that no organic solvent is employed in the process and that no oil or solid fuel is burned and none of the products being cleaned has residues of organic solvent and VOC emissions are <5 lbs/day	(i)(8)
☐	Hot wire cutting of expanded polystyrene foam which emit < 5 lbs/day of VOCs.	(i)(9)
☐	Any coating and/or ink manufacturing operations located at a stationary source, which emit < 15 lbs/day of VOCs.	(o)(9)
☐	Any operation producing materials for use in cosmetic or pharmaceutical products and/or manufacturing cosmetic or pharmaceutical products by chemical processes, which emit < 15 lbs/day of VOCs	(o)(12)
☒	Refrigeration units except those used as, or with, air pollution control equipment with a charge of < 50 lbs of a Class I or II ozone depleting compound.	(o)(18)
☐	Atmospheric organic gas sterilizer cabinets where ethylene oxide emissions are < 5 lbs/yr	(o)(28)
☐	Aerosol can puncturing/crushing operations which vents all emissions through a properly operated/maintained carbon canister, provided < 500 cans/day are processed.	(o)(29)(ii)
☐	Solvent wipe cleaning operations using a container applicator that minimizes emissions to the air where the uncontrolled emissions of VOCs < 5 ton/yr, or the total purchase of solvents < 1,500 gal/yr, or the total purchase of solvents containing a single HAP < 350 gal/yr.	(o)(32)
☐	Equipment approved for use by the EPA for recovering and/or recycling CFCs provided such equipment is charged with < 50 lbs. of a Class I or II ozone depleting compound.	(o)(33)
☐	Stationary IC engines rated at ≤ 200 bhp installed and operated before November 15, 2000, which operate < 200 hr/yr.	(o)(34)(ii)

San Diego County Air Pollution Control District
10124 Old Grove Road San Diego CA 92131-1649
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Title V Application
Applicable Requirements Summary Checklist (Form 1401-H1)

Company Name	District Use Only
San Diego Gas & Electric (PEC)	NEDS # _____ SITE ID # _____

APPLICABLE REQUIREMENTS: Applicable requirements which apply to an entire facility are listed first. The applicant should check appropriate boxes on the form and attach emission unit specific permit number lists where necessary. Where streamlining is employed, note on this form. If information does not fit in the space allotted, attach documentation and reference it on this form. **Type or print legibly.**

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	GT/HRSG #1	GT/HRSG #2	Emergen. Engine											Future Effective Date
	Facility Applicable Requirement Description																	
10(a)	Permits Required – (a) Authority to Contruct			X														
10(b)	Permits Required – (b) Permit to Operate			X														
19	Provision of Sampling & Testing Facilities			X														
19.2	Continuous Emission Monitoring Requirements				X	X												
19.3	Emission Information			X														
NSR	New Source Review			X														
PSD	Prevention of Significant Deterioration			X														
21	Permit Conditions			X														
50	Visible Emissions			X														
51	Nuisance			X														
60	Circumvention			X														
67.0	Architectural Coatings	(g)		X														
67.17	Storage of Materials Containing VOC	(e)		X														
71	Abrasive Blasting			X														
98	Breakdown Conditions: Emergency Variance			X														
101	Burning Control			X														
131	Stationary Source Curtailment Plan																	
132	Traffic Abatement Plan																	

TITLE V APPLICATION
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	GT/HRSG #1	GT/HRSG #2	Emergen. Engine											Future Effective Date
	Equipment Specific Applicable Requirement Description																	
50	Visible Emissions			X	X	X	X											
51	Nuisance			X														
52	Particulate Matter	Method 5			S	S	X											
53	Specific Contaminants	Method 5			S	S	X											
53.1	Scavenger Plants																	
54	Dust and Fumes	Method 5		S														
58	Incinerator Burning																	
59	Control of Waste Disposal – Site Emissions	(e)	(e) & (f)															
60	Circumvention																	
61.1	Receiving & Storing VOCs at Bulk Plants & Terminals	(d)	(c)(7)															
61.2	Transfer of VOCs into Mobil Transport Tanks	(c)(10)																
61.3	Transfer of VOCs into Stationary Storage Tanks		(c)(2)(iii)															
61.4	Transfer of VOCs into Vehicle Fuel Tanks																	
61.5	Visible Emissions Standards for Vapor Control Equip.		VE															
61.7	Spillage & Leakage of VOCs																	
61.8	Certification Requirements for Vapor Control Equip.																	
62	Sulfur Content of Fuels				S	S	X											
64	Reduction of Animal Matter																	
66	Organic Solvents	(p)	(o)															
67.1	Alternative Emission Control Plans (AECP)	(c)	(d)															
67.2	Dry Cleaning - Petroleum Solvent	(f)	(e)															
67.3	Metal Parts Coating	(g)	(f)															
67.4	Can & Coil Coating	(g)	(f)															
67.5	Paper, Film and Fabric Coating	(f)	(e)															
67.6	Solvent Cleaning Operation	(f)																
67.7	Cutback & Emulsified Asphalt	(f)	(e)															
67.9	Aerospace Coating Operations	(g)	(f)															
67.10	Kelp Processing and Bio-Polymer Mfg.	(f)	(e)															
67.11	Wood Products Coating Operations (not in SIP)																	

TITLE V APPLICATION
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	GT/HRSG #1	GT/HRSG #2	Emergen. Engine											Future Effective Date
67.12	Polyester Resin Operations	(g)	(f)															
67.15	Pharmaceutical & Cosmetic Manufacturing	(e)																
67.16	Graphic Arts Operations	(g)	(f)															
67.17	Open VOC Containers	(e)																
67.18	Marine Coating Operations	(g)	(f)															
67.19	Coating and Printing Inks Mfg. Operations	(g)	(f)															
67.20	Motor Vehicle & Mobile Equipment Refinishing Operations																	
67.21	Adhesive Material Application Operations																	
67.22	Expandable Polystyrene Foam Products Manufacturing Operations (not in SIP)																	
67.24	Bakery Ovens	(f)	(e)															
68	Fuel Burning Equipment - NOx																	
69.2	Boilers	(f)	(e) & (g)		S	S												
69.3	Stationary Gas Turbine Engines - RACT	(f)	(e) & (g)		S	S												
69.3.1	Stationary Gas Turbine Engines – BARCT (not in SIP)	(f)	(e) & (g)		S	S												
69.4	Stationary Internal Combustion Engines - RACT	(f)	(e)				X											
69.4.1	Stationary Internal Combustion Engines – BARCT (not in SIP)	(f)	(e)				X											
70	Orchard Heaters																	
71	Abrasive Blasting																	
20.1	Applicability, Definitions, Emission Calculations, Emission Offsets and Banking, Exemptions, and Other Requirements (SIP Version 7/5/79)				X	X	X											
20.1	NSR - General Provisions (Version 11/4/98) (not in SIP)				X	X	X											
20.2	Standards for Authority to Construct Best Available Control Technology (SIP Version 7/5/79)				X	X	X											
20.2	NSR – Non-major Stationary Sources (Version 11/4/98) (not in SIP)				X	X	X											
20.3	Standards for Authority to Construct - Air Quality Analysis (SIP Version 7/5/79)																	

TITLE V APPLICATION
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	GT/HRSG #1	GT/HRSG #2	Emergen. Engine											Future Effective Date
20.3	NSR – Major Stationary Source and PSD Stationary Source (Version 11/4/98) (not in SIP)				X	X	X											
20.4	Standards for Authority to Construct - Major Sources (SIP Version 7/5/79)				X	X	X											
20.4	NSR – Portable Emission Units (Version 11/4/98) (not in SIP)																	
20.5	Power Plants (SIP Version 7/5/79)				X	X												
20.6	Standards for Permit to Operate Air Quality Analysis (SIP Version 7/5/79)																	
SUBPART	**Regulation X - Standards of Performance for New Stationary Sources (NSPS)**	**Rule #**	**Rule #**															
A	General Provisions		260.7 260.13		S	S	X											
D	Standards of Performance for Fossil-Fuel Fired Steam Generators	260.46	260.45															
Da	Standards of Performance for Electric Utility Steam Generating Units Constructed After September 18, 1978		260.47a 260.48a 260.49a															
Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating	260.45b 260.46b	260.47b 260.48b 260.49b		S	S												
E	Standards of Performance for Incinerators	260.54	260.53															
I	Standards of Performance for Asphalt Concrete Plants	260.93																
K	Standards of Performance for Storage Vessels for Petroleum Liquids Constructed after June 11, 1973 and Prior to May 19, 1978		260.113															
Ka	Standards of Performance for Storage Vessels for Petroleum Liquids Constructed after May 18, 1978	260.113a	260.115a															
Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984	260.113b	260.115b 260.116b															

TITLE V APPLICATION
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	GT/HRSG #1	GT/HRSG #2	Emergen. Engine											Future Effective Date
Subpart																		
L	Standards of Performance for Secondary Lead Smelters	260.123																
M	Standards of Performance for Secondary Brass and Bronze Ingot Production Plants	260.133																
O	Standards of Performance for Sewage Treatment Plants	260.154	260.153															
DD	Standards of Performance for Grain Elevators	260.303																
EE	Standards of Performance for Surface Coating Metal Furniture	260.313 260.316	260.314 260.315															
GG	Standards of Performance for Stationary Gas Turbines	260.335	260.334		S	S												
QQ	Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing	260.433 260.435	260.434															
RR	Standards of Performance for the Pressure Sensitive Tape and Label Surface Coating Operations	260.444 260.446	260.445 260.447															
SS	Standard of Performance for the Industrial Surface Coating Large Appliances	260.453 260.456	260.454 260.455															
TT	Standards of Performance for Metal Coil Surface Coating	260.463 260.466	260.464 260.465															
BBB	Standards of Performance for the Rubber Tire Manufacturing Industry	260.543 260.547	260.544 260.545 260.546															
FFF	Standards of Performance for Flexible Vinyl and Urethane Coating and Printing	260.583	260.584 260.585															
JJJ	Standards of Performance for Petroleum Dry Cleaners																	
SUBPART	**New Source Performance Standards (40 CFR 60)**																	
Cb, F	Portland Cement Plants																	
Dc	Small Industrial -Commercial -Institutional Steam Generators >10 MM Btu but <100 MM Btu.																	
Ea	Municipal Waste Combustors																	
G	Nitric Acid Plants																	
H & Cb	Sulfuric Acid Plants																	

TITLE V APPLICATION
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	GT/HRSG #1	GT/HRSG #2	Emergen. Engine											Future Effective Date
Subpart																		
N	Oxygen Process Furnaces																	
Na	Oxygen Process Steelmaking Facilities																	
P	Primary Copper Smelters																	
Q	Primary Zinc Smelters																	
R	Primary Lead Smelters																	
S	Primary Aluminum Reduction Plants																	
T & U	Phosphate Fertilizer Industry																	
V,W,X	Phosphate Fertilizer Industry																	
Y	Coal Preparation Plants																	
Z	Ferroalloy Production Facilities																	
AA, AAa	Steel Plants																	
BB	Kraft Pulp Mills																	
CC	Glass Manufacturing Plants																	
HH	Lime Manufacturing Plants																	
KK	Lead-Acid Battery Manufacturing Plants																	
LL	Metallic Mineral Processing Plants																	
MM	Automobile and Light-Duty Truck Surface Coating Operations																	
NN	Phosphate Rock Plants																	
PP	Ammonium Sulfate Manufacture																	
UU	Asphalt Processing and Asphalt Roofing Manufacture																	
VV	Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry.																	
WW	Beverage Can Surface Coating Industry																	
XX	Bulk Gasoline Terminals																	
AAA	New Residential Wood Heaters																	
DDD	VOC Emissions from the Polymer Mfg. Ind.																	
GGG	Equipment Leaks of VOC in Petroleum Refineries.																	

TITLE V APPLICATION
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	GT/HRSG #1	GT/HRSG #2	Emergen. Engine											Future Effective Date
Subpart																		
HHH	Synthetic Fiber Production Facilities																	
KKK, LLL	Onshore Natural Gas Processing: VOC Equipment Leaks and SO_2 Emissions.																	
HHH	Synthetic Fiber Production Facilities																	
KKK, LLL	Onshore Natural Gas Processing: VOC Equipment Leaks and SO_2 Emissions.																	
NNN	VOC Emissions from Synthetic Organic Chemical Manufacturing Industry Distillation Operations.																	
OOO	Standard of Performance for Nonmetallic Mineral Processing Plants																	
PPP	Wool Fiberglass Insulation Mfg. Plants																	
QQQ	VOC Emissions from Petroleum Refinery Wastewater Systems.																	
RRR	VOC Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes.																	
SSS	Magnetic Tape Coating Facilities																	
TTT	Industrial Surface Coating Surface, Surface Coating of Plastic Parts for Business Machines.																	
UUU	Calciners and Dryers in Mineral Industries.																	
VVV	Polymeric Coating of Supporting Substances Facilities.																	
WWW	Standards of Performance for Municipal Solid Waste Facilities																	
SUBPART	**REGULATION XI - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS)**																	
A	General Provisions																	
C, D	Beryllium Extraction Plants; Ceramic Plants, Foundries, Incinerators, Propellant Plants, and Machine Shops that Process Beryllium Containing Material; and Rocket Motor Firing Test Sites.																	

TITLE V APPLICATION
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	GT/HRSG #1	GT/HRSG #2	Emergen. Engine											Future Effective Date
Subpart																		
E	Mercury Ore Processing; Manufacturing Processes Using Mercury Chloralkali Cells; and Sludge Incinerators.																	
F	Ethylene Dichloride Mfg. Via Oxygen, HCl and Ethylene; Vinyl Chloride Mfg.; and Polyvinyl Chloride Mfg.																	
M	Asbestos Mills; Roadway Surfacing with Asbestos Tailings; Manufacture of Products Containing Asbestos; Demolition; Renovation; and Spraying and Disposal of Asbestos Waste.																	
SUBPART	**NESHAPS (40 CFR 61)**																	
B,Q,R, T,W,	Underground Uranium Mines; Dept. of Energy Facilities; Phosphorus Fertilizer Plants; & Facilities Processing or Disposing of Uranium Ore & Tailings.																	
H,I,K	Dept. of Energy; Nuclear Regulatory Commission Licensed Facilities; Other Federal Facilities; and Elemental Phosphorus Plants. (Radionuclide)																	
J,L,Y, BB,FF	Fugitive Process, Storage, and Transfer Equipment Leaks; Coke By-Product Recovery Plants; Benzene Storage Vessels; Benzene Transfer Operations; and Benzene Waste Operations.																	
N,O,P	Glass Manufacturer; Primary Copper Smelter; Arsenic Trioxide and Metallic Arsenic Production Facilities.																	
V	Pumps, Compressors, Pressure Relief Devices, Connections, Valves, Lines, Flanges, Product Accumulator Vessels, etc. in VHAP Service.																	
SUBPART	**MACT Standards (40 CFR 63)**																	
F,G, H,I	Amendment: Reopening, Averaging Issue																	
L	Coke Ovens																	
O	Ethylene Oxide Sterilizers																	
Q	Industrial Process Cooling Towers																	
R	Gasoline Distribution Facilities																	

TITLE V APPLICATION
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	GT/HRSG #1	GT/HRSG #2	Emergen. Engine											Future Effective Date
Subpart																		
T	Halogenated Solvent Cleaning Degreasing																	
X	Secondary Lead Smelters																	
Y	Marine Tank Loading/Unloading																	
CC	Petroleum Refineries																	
DD	Off-Site Waste and Recovery Operations																	
EE	Magnetic Tape																	
GG	Aerospace (Coatings)																	
II	Shipbuilding for Ship Repair (Surface Coating)																	
JJ	Wood Furniture Industry (Coatings)																	
KK	Printing and Publishing																	
AAAA	Municipal Solid Waste Landfills																	
DDDDD	Industrial, Commercial and Institutional Boilers and Process Heaters																	
MMMM	Surface Coating of Miscellaneous Metal Parts and Products																	
PPPP	Surface Coating of Plastic Parts																	
ZZZZ	Reciprocating Internal Combustion Engines																	
YYYY	Stationary Combustion Turbines																	
	California Airborne Toxic Control Measures (ATCM) 17 CCR																	
§93102	Hexavalent Chromium ATCM for Chrome Plating and Chromic Acid Anodizing Operations																	
§93109	ATCM for Emissions of Perchloroethylene from Dry Cleaning Operations																	
	40 CFR Part 68 RMP			X														
	Title IV - Acid Rain (40 CFR 72)				X	X												
	Title VI-Ozone Depleting Compounds (40 CFR 82)																	
B	Servicing of Motor Vehicle Air Conditioners	B																
F	Servicing of Other Air Conditioners	F																

San Diego County Air Pollution Control District
10124 Old Grove Road San Diego CA 92131-1649
(858) 586-2600 FAX (858) 586-2601

TITLE V APPLICATION
LIST OF PERMITS BY EQUIPMENT CATEGORY (FORM 1401-H2)

Company Name	District Use Only
San Diego Gas & Electric (SDG&E)	NEDS # _____
Facility Address: 2300 Harveson Place, SD1473	SITE ID # _____
Escondido, CA 92029	

PERMITTED EMISSION UNITS BY EQUIPMENT CATEGORY

In the emission unit (equipment) category order entered on Form 1401-H1, Applicable Requirements Summary Checklist, list emission units by permit number for the specific emission unit (equipment) category. Under the column labeled status place an "O" if operational, "N" if non-operational, or "S" if the equipment is new and currently operating under a startup authorization. **If more space is required, use additional forms. Please type or print legibly.**

Emission Unit Category	Application/ Permit No.	Status of Emission Unit
Gas Turbine #1 & HRSG #1	APCD2010-PTO-000623	O
Gas Turbine #2 & HRSG #2	APCD2010-PTO-000625	O
Emergency IC Engine	APCD2011-PTO-000873	O

San Diego County Air Pollution Control District
10124 Old Grove Road San Diego CA 92131-1649
(858) 586-2600 FAX (858) 586-2601

TITLE V APPLICATION
Certification Statement (FORM 1401-I)

Company Name	District Use Only
San Diego Gas & Electric (Elect. Generation)	NEDS #_____
Facility Address: 2300 Harveson Place, SD1473	SITE ID #_____
Escondido, CA 92029	

Under penalty of perjury, identify the following: (Read each statement carefully and check each box for confirmation.)

Applicable	Not Applicable	
☒	☐	*Based on information and belief formed after reasonable inquiry, the source(s) identified in this application will continue to comply with the applicable requirement with which the source is in compliance. The applicable requirement(s) with which the source(s) is/are not in compliance is/are identified in Form 1401-L, Schedule of Compliance.*
☒	☐	*Based on information and belief formed after reasonable inquiry, the source(s) identified in this application will comply with the future-effective applicable requirement(s) on a timely basis.*
☐	☒	*Based on information and belief formed after reasonable inquiry, the source(s) identified in the Schedule of Compliance application form that is/are not in compliance with the applicable requirement(s), will comply in accordance with the attached compliance plan schedule.*
☒	☐	*Based on information and belief formed after reasonable inquiry, information on application forms, referenced documents, all accompanying reports, and other required certifications are true, accurate, and complete.*
☒	☐	*All fees required by Regulation III, Rule 40 have been paid.*

Carl S. LaPeter
Signature of Responsible Official

11 SEP 2017
Date

Carl LaPeter
Print Name of Responsible Official

(760) 432-2503
Telepone No. of Responsible Official

Plant Manager
Title of Responsible Official

San Diego County Air Pollution Control District
10124 Old Grove Road San Diego CA 92131-1649
(858) 586-2600 FAX (858) 586-2601

TITLE V APPLICATION
Multiple Applicable Requirements Streamlining (FORM 1401-O)

Company Name	District Use Only
SAN DIEGO GAS & ELECTRIC (ELECTRIC GENERATION)	NEDS # _____
Facility Address: 2300 HARVESON PLACE, SD1473, ESCONDIDO, CA 92029	SITE ID # _____

MULTIPLE APPLICABLE REQUIREMENTS STREAMLINING

If more space is required, use additional forms. Please type or print legibly.

Application No(s) Permit No(s)	Multiple Applicable Requirements	Streamlined Requirements	Attachment Number
976846	GT/HRSG #1; See Attachment O-1	See Attachment O-1	O-1
984082	GT/HRSG #2; See Attachment O-1	See Attachment O-1	O-1

Attachment O-1, Palomar Energy Center
Multiple Applicable Requirements Streamlining - Gas Turbine (with Duct Burner)
(Permit Nos. APCD2010-PTO-000623-V1 and APCD2010-PTO-000625)

Table 1. Summary of Multiple Applicable Requirements (*Updated:* July 2017)

Subject	Permit Condition (Permit Nos. APCD2010-PTO-000623 and APCD2010-PTO-000625)	SDAPCD Rule	Federal Requirement
NOx Emission Rates (Gas Turbine)	SDAPCD NSR; Condition Nos: 5, 10, 14, 15, 16, 18	SDAPCD Rule 69.3(d)(1)(i) SDAPCD Regulation X, Subpart GG	40 CFR Part 60 §60.332(a)(1)
NOx Emission Rates (Duct Burner)	SDAPCD NSR; Condition Nos: 5, 10, 14, 15, 16, 18	SDAPCD Regulation X, Subpart Db	40 CFR Part 60 §60.44b(l)(1)
NOx Control Work Practices	SDAPCD NSR; Condition Nos.: 4, 20, 32, 34	None	None
NOx Emissions Monitoring Requirements: Continuous Emissions Monitoring System	SDAPCD NSR; Condition Nos.: 4, 37, 38	SDAPCD Rule 69.3(e)(1) and (2), (g)	40 CFR Part 75 §75.10(a)(2) and §75.12(c)
NOx Emissions Recordkeeping Requirements	SDAPCD NSR; Condition No. 20	SDAPCD Rule 69.3(e)(3) and (5) SDAPCD Regulation X, Subpart A, Rule 260.4(b), 260.7(c)	40 CFR Part 75 §75.57(a), (b), and (d) 40 CFR Part 60 §60.4(b) 40 CFR Part 60 §60.7(c)
SOx Emission Rates	SDAPCD NSR; Condition No. 2	SDAPCD Rule 53(d)(1) SDAPCD Regulation X, Subpart GG	40 CFR Part 60 § 60.333(a)
SOx Emissions Work Practices, Monitoring and Recordkeeping Requirements	SDAPCD NSR; Condition No. 2	SDAPCD Regulation X, Subpart A, Rule 260.4(b), 260.7 (c)	40 CFR Part 60 §60.4(b) 40 CFR Part 60 §60.7(c)
Sulfur Content of Fuels	SDAPCD NSR; Condition No. 2	SDAPCD Rule 62(b)(1) SDAPCD Regulation X, Subpart GG	40 CFR Part 60 § 60.333(b)
Sulfur Content of Fuels Work Practices, Monitoring and Recordkeeping Requirements	SDAPCD NSR; Condition No. 2	SDAPCD Regulation X, Subpart A, Rule 260.4(b), 260.7 (c)	40 CFR Part 60 §60.4(b) 40 CFR Part 60 §60.7(c)

Multiple requirements were identified pertaining to the gas turbine: (1) NOx emission limits, (2) SOx emission limit from and (3) sulfur content of fuel. The following is a discussion of the applicable requirements, determination of the most stringent emission limit and associated monitoring and record keeping requirements, and proposed streamlined requirements.

NOx requirements for the HRSG are specific to the duct burner. However, the duct burner is inherent to the combined-cycle gas turbine configuration. **MARS are presented only for NOx emission limits in the table of contents**, while it is assumed that all other MARS associated with the gas turbine inherently demonstrates compliance for the duct burner MARS via NSR conditions and therefore all other requirements are subsumed.

(A) NOx EMISSIONS FROM GAS TURBINE (with or without Duct Burner)

Step One: Identification of multiple requirements

#	Requirement	Equivalent Limit (ppm NOx @ 15% O2)
1	• **SDAPCD NSR; Condition 5 -** When the unit is combusting fuel (operating), the concentration of oxides of Nitrogen (NOx), calculated as nitrogen dioxide (NO2) and measured in the exhaust stack, shall not exceed 2.0 parts per million by volume on a dry basis (ppmvd) corrected to 15% oxygen, except during periods of startup, shutdown, low load operation, or tuning.	**2**
2	• **SDAPCD NSR; Condition 10 -** When the unit is operating, the concentration of Oxides of Nitrogen (NOx), calculated as Nitrogen Dioxide (NO2) and measured in the exhaust stack, shall not exceed 42 ppmvd corrected to 15% oxygen, calculated over each clock hour period, except for periods of Startup and Shutdown, as defined in Rule 69.3. All CEMS calculations, averages shall be performed in accordance with the CEMS protocol approved by the District.	**42**
n/a	• **SDAPCD NSR; Condition 14 -** When operating with the duct burner at or below 19.5 MMBTU/hr heat input, mass emissions from each unit shall not exceed the following limits, except during periods of startup, shutdown, low load operation, or tuning. A 3 clock-hour averaging period for these limits shall apply to CEMS data except for NOx emissions during non-transient hours when a 1 clock-hour averaging period shall apply. Pollutant - Emission Limit, lbs/hr A) Oxides of Nitrogen, NOx (calculated as NO2) - 13.4 B) Carbon Monoxide, CO -16.3 C) Volatile Organic Compounds, VOC - 4.0 CONDITION WILL NOT BE STREAMLINED	**~2 ppm @ rated Heat Input**
n/a	• **SDAPCD NSR; Condition 15 -** When operating with the duct burner firing above 19.5 MMBTU/hr heat input, mass emissions from each unit shall not exceed the following limits, except during periods of startup, shutdown, low load operation, or tuning. A 3 clock-hour averaging period shall apply to CEMS data Pollutant - Emission Limit, lbs/hr A) Oxides of Nitrogen, NOx (calculated as NO2) - 14.9 B) Carbon Monoxide, CO -18.1 C) Volatile Organic Compounds, VOC - 7.3 CONDITION WILL NOT BE STREAMLINED	**~2 ppm @ rated Heat Input**

#	Requirement	Equivalent Limit (ppm)
n/a	• **SDAPCD NSR; Condition 16** - Total combined NOx emissions from both units shall not exceed 400 pounds per hour, calculated as Nitrogen Dioxide and measured over each 1-clock-hour period. These limits shall apply during all times during which one or both units are operating, including, but not limited to, emissions during periods of startup, shutdown, low load operation and tuning. In addition, Unit No. 1 shall not begin operating while Unit No. 2 is already operating in a startup period nor shall Unit No. 2 begin operating while Unit No. 1 is already operating in a startup period unless the unit already operating in a startup period meets all of the following in the clock-minute immediately preceding the clock-minute that the other unit begins operating: (A) has been operating with a gross electrical output from the combustion turbine of 64 MW or more during the preceding 10 consecutive clock-minute period; (B) the concentration of NOx, calculated as NO2 and measured in the exhaust stack, does not exceed 2.0 ppmvd corrected to 15% oxygen, and (C) the concentration of CO measured in the exhaust stack does not exceed 4.0 ppmvd corrected to 15% oxygen. (Rule 20.3(d)(2)(i)0 CONDITION WILL NOT BE STREAMLINED	**n/a**
n/a	• **SDAPCD NSR; Condition 18** - Total aggregate emissions of oxides of nitrogen (NOx), calculated as nitrogen dioxide, from all stationary emission units at this stationary source, except emissions or emission units excluded from the calculation of aggregate potential to emit as specified in Rule 20.1 (d) (1), shall not exceed 104.3 tons in each rolling 12-calendar month period. CONDITION WILL NOT BE STREAMLINED	**n/a**
3	• **SDAPCD Rule 69.3(d)(1)(i)** Emissions concentration of oxides of nitrogen (NOx) from any unit subject to this rule, calculated as nitrogen dioxide at 15% oxygen on a dry basis, shall not exceed 42 parts per million by volume (ppmv) when operated on a gaseous fuel.	**42**
4	• **SDAPCD Regulation X, Subpart GG** *(See below for 40 CFR 60 applicable requirement; Rule is the equivalent of 40 CFR 60 incorporated by reference.)*	**159**
5	• **SDAPCD Regulation X, Subpart Db** *(See below for 40 CFR 60 applicable requirement; Rule is the equivalent of 40 CFR 60 incorporated by reference.)*	**54**
6	• **40 CFR Part 60 Subpart GG, §60.332(a)(1)** No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any stationary gas turbine, any gases which contain nitrogen oxides in excess of: STD = 0.0075 * [(14.4)/Y]+F **Calculation of Limit** Y = 9.87 kJ/watt-hr per the turbine manufacturer F = 0.005 for natural gas with nitrogen content of 0.2610%. Therefore, the emission limit is: STD = 0.0075*[(14.4/9.87]+0.005 = 0.159 % by volume @ 15% O2 STD = 159 ppmdv @ 15% O2	**159**

#	Requirement	Equivalent Limit (ppm)
7	• **40 CFR Part 60 Subpart Db, §60.44b(a)(4)(i)** Except as provided under paragraphs (k) and (l) of this section, on and after the date on which the initial performance test is completed or is required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that is subject to the provisions of this section and that combusts only coal, oil, or natural gas shall cause to be discharged into the atmosphere from that affected facility any gases that contain NOx (expressed as NO2) in excess of the following limits: Fuel/steam generating unit type — Nitrogen oxide emission limits (4) Duct burner used in a combined cycle system: — (expressed as NO2) heat input (i) Natural gas and distillate oil — 86 ng/J or 0.20 lb/MMBtu *Note:* *This requirement applies to the Duct Burner.* **Convert Limit to ppm @ 15% O2 for Comparison to Other Limits** From 40CFR75, Formula 19-1 NOx (lb/MMBtu) = NOx (ppm @ 15% O2) * 1.194*10**-7*8710*(20.9/(20.9-15) NOx (ppm @ 15% O2) = NOx ((lb/MMBtu) *(20.9-15)/(20.9*(1.194*10**-7*8710)) NOx (ppm @ 15% O2) = 0.2*5.9/(20.9*1.194*10**-7*8710) = 54.3 Limit = 54.3 ppm @ 15% O2	**54**

Step Two: Determine most stringent NOx emission limit		
#	**Requirement**	**Equivalent Limit (ppm NOx @ 15% O2)**
4	•SDAPCD Regulation X, Subpart GG	159
6	•40 CFR Part 60 Subpart GG, §60.332(a)(1)	159
5	•SDAPCD Regulation X, Subpart Db	54
7	•40 CFR Part 60 Subpart Db, §60.44b(a)(4)(i)	42
3	•SDAPCD Rule 69.3(d)(1)(i)	42
2	•SDAPCD NSR; Condition 10	42
1	•SDAPCD NSR; Condition 5	2
STREAMLINED REQUIREMENTS		
	The NOx emission limit from Requirement #1 (SDAPCD NSR permit Condition No. 5) is the lowest limit, but it is not unambiguously the most stringent requirement because of the exclusions for low load and tuning operations. Requirement #2 (SDAPCD NSR permit Condition No. 10) is the most stringent of the remaining requirements. Therefore, Requirements #3-#7 can be subsumed by Requirement #2 (SDAPCD NSR permit Condition No. 10). Requirements #1 and #2 (SDAPCD NSR permit Conditions Nos. 5 and 10) collectively represent the most stringent requirements of the multiple requirements and are therefore the streamlined requirements. The other requirements are subsumed.	

Step Three: Evaluate work practice requirements		
	Requirement	**Condition No.**
	• **SDAPCD NSR; Condition 4** - For purposes of determining compliance based on source testing, the average of three subtests shall be used.	4
	For purposes of determining compliance with emission limits based on the CEMS, data collected in accordance with the CEMS protocol shall be used and averaging periods shall be as specified herein.	4
	• **SDAPCD NSR; Condition 20** - The permittee shall maintain records, on at least a calendar quarterly basis, of total aggregate mass emissions of NOx in tons from all stationary emission units at this stationary source, except emissions or emission units excluded from the calculation of aggregate potential to emit as specified in Rule 20.1 (d) (l), for each rolling 12-calendar month period. These records shall be made available for inspection within 30 calendar days after the end of each calendar quarter.	20
	• **SDAPCD NSR; Condition 32** - This unit shall be source tested to demonstrate compliance with the NOx emission standards of this permit, using District approved methods. The source test and the NOx Relative Accuracy Test Audit (RATA) tests shall be conducted in accordance with the applicable RATA frequency requirements of 40 CFR75, appendix B, sections 2.3.1 and 2.3.3.	32
	• **SDAPCD NSR; Condition 34** - If source testing will be performed by an independent contractor and witnessed by the District, a source test protocol shall be submitted to the District for written approval at least 30 days prior to source testing. The source test protocol shall comply with the following requirements:	34
	A. Measurements of NOx and O2 emissions shall be conducted in accordance with U.S. Environmental Protection Agency (EPA) methods 7E and 3A, respectively, and District Test, method 100, or alternative methods approved by the District.	34
	E. Source testing shall be performed with both the combustion turbine and duct burner in operation. Each duct burner shall operate with a minimum heat input of 97 MMBTU/hr.	34
	F. Source testing shall be performed at the most frequently used load level, as specified in 40 CFR Part 75 Appendix A Section 6.5.2.1.d, provided it is not less than 80% of the unit's rated load unless it is demonstrated to the satisfaction of the district that the unit cannot operate under these conditions. If the demonstration is accepted, the the emissions source testing shall be performed at the highest achievable continuous level power level.	34
	• **SDAPCD Rule 69.3: None**	n/a
	• **SDAPCD Regulation X, Subpart GG : None** *(See below for 40 CFR 60 applicable requirement; Rule is the equivalent of 40 CFR 60 incorporated by reference.)*	n/a
	• **40 CFR Part 60 Subpart GG: None**	n/a
STREAMLINED REQUIREMENTS		
	The streamlined work practice requirement will be the work practices associated with the most stringent emission limit in the SDAPCD NSR permit. The work practices contained in the SDAPCD NSR permit are considered to be the streamlined requirements.	n/a

Step Four: Evaluate monitoring requirements		
	Requirement	**Condition No.**
	• **SDAPCD NSR; Condition 4** - For purposes of determining compliance with emission limits based on the CEMS, data collected in accordance with the CEMS protocol shall be used and averaging periods shall be as specified herein.	4
	• **SDAPCD NSR; Condition 37** - The Oxides of Nitrogen (NOx) and Oxygen (O2) CEMS shall be certified and maintained in accordance with applicable federal regulations including the requirements of Sections 75.10 and 75.12 of Title 40, Code of Federal Regulations Part 75 (40 CFR 75), the performance specifications of Appendix A of 40 CFR 75, the quality assurance procedures of Appendix B of 40 CFR 75 and the CEMS protocol approved by the District.	37
	• **SDAPCD NSR; Condition 38** - Continuous emission monitoring system (CEMS) shall be installed and properly maintained and calibrated to measure, calculate and record the following, in accordance with the District approved CEMS protocol: A. Hourly average concentration of Oxides of Nitrogen (NOX) corrected to 15% oxygen, in parts per million (ppmvd); C. Percent oxygen (O2) in the exhaust gas (%), for each clock hour period; D. Average concentration of Oxides of Nitrogen (NOX) for each continuous rolling 3-hour period, in parts per million (ppmv) corrected to 15% oxygen; E. Hourly and Monthly mass emissions of Oxides of Nitrogen (NOX), in pounds; F. Rolling 12 month mass emissions of Oxides of Nitrogen (NOX), in tons;	38
	• **SDAPCD NSR; Condition 38** - The CEMS shall be in operation in accordance with the District approved CEMS monitoring protocol at all times when the combustion turbine is in operation.	38
	• **SDAPCD Rule 69.3(e)(1) and (2), (g)** Continuous monitoring for operational characteristics of the unit and NOx emissions reduction system including: (i) exhaust gas flow rate; (ii) exhaust gas temperature; (iii) ammonia injection rate; (iv) water injection rate; and (v) stack-gas oxygen content.	n/a
	An owner or operator of any unit with a continuous emission monitoring system (CEMS) which has been installed to measure NOx emissions pursuant to any federal regulation shall certify, calibrate and maintain the CEMS in accordance with applicable federal regulations including the reporting requirements of Sections 60.7(c), 60.7(d), and 60.13 of Title 40, Code of Federal Regulations Part 60 (40 CFR 60), performance specifications of Appendix B of 40 CFR 60, quality assurance procedures of Appendix F of 40 CFR 60, and a protocol approved in writing by the Air Pollution Control Officer.	n/a
	Any required source testing shall be performed at no less than 80% of the power rating. A unit subject to the requirements of Section (d) shall be tested for compliance at least annually before the Permit to Operate renewal date, unless otherwise specified in writing by the Air Pollution Control Officer.	n/a

	• **40 CFR Part 75, §75.10(a)(2)** To determine NOx emissions, the owner or operator shall install, certify, operate, and maintain, in accordance with all the requirements of this part, a NOx-diluent continuous emission monitoring system (consisting of a NOx pollutant concentration monitor and an O2 or CO2 diluent gas monitor) with an automated data acquisition and handling system for measuring and recording NOx concentration (in ppm), O2 or CO2 concentration (in percent O2 or CO2) and NOx emission rate (in lb/mmBtu) discharged to the atmosphere;	n/a
	• **40 CFR Part 75, §75.12(c)** The owner or operator shall calculate hourly, quarterly, and annual NOx emission rates (in lb/mmBtu) by combining the NOx concentration (in ppm), diluent concentration (in percent O2 or CO2), and percent moisture (if applicable) measurements according to the procedures in Appendix F to this part.	n/a
STREAMLINED REQUIREMENTS		
	The streamlined monitoring requirements will be the monitoring requirements associated with the most stringent emission limit in the SDAPCD NSR permit. The monitoring requirements contained in the SDAPCD NSR permit are considered to be the streamlined requirements. Any other monitoring requirements are subsumed.	n/a

Step Five: Evaluate recordkeeping / reporting

	Requirement	**Condition No.**
	• **SDAPCD NSR; Condition 20** - The permittee shall maintain records, on at least a calendar quarterly basis, of total aggregate mass emissions of NOx in tons from all stationary emission units at this stationary source, except emissions or emission units excluded from the calculation of aggregate potential to emit as specified in Rule 20.1 (d) (l), for each rolling 12-calendar month period.	20
	• **SDAPCD NSR; Condition 20** - These records shall be made available for inspection within 30 calendar days after the end of each calendar quarter.	20
	• **SDAPCD Rule 69.3(e)(3) and (5)** Maintain an operating log and record actual times and duration of all startups, shutdowns and fuel changes, and the type and quantity of each fuel used; maintain all records required by Section (e) for a minimum of two calendar years. These records shall be maintained on the premises and made available to the District on request.	n/a
	• **SDAPCD Regulation X, Subpart A, Rule 260.4(b), 260.7(c)** *(See below for 40 CFR 60 applicable requirement; Rule is the equivalent of 40 CFR 60 incorporated by reference.)*	n/a
	• **40 CFR Part 75 §75.57(a), (b), and (d)** - Maintain for each affected unit a file of all measurements, data, reports, and other information required by this part at the source in a form suitable for inspection for at least three (3) years from the date of each record. - The owner or operator shall record for each hour the required information on unit operating time, heat input rate, and load, separately for each affected unit. - The owner or operator shall record the applicable information required for NOx emissions monitoring for each affected unit for each hour or partial hour during which the unit operates.	n/a

	• **40 CFR Part 60 §60.4(b), §60.7(c)** -Administrator to delegate to each State, when appropriate, the authority to implement and enforce standards of performance for new stationary sources located in such State. All information required to be submitted to EPA must also be submitted to the appropriate State Agency of any State to which this authority has been delegated (provided, that each specific delegation may except sources from a certain Federal or State reporting requirement). - Each owner or operator required to install a continuous monitoring device shall submit excess emissions and monitoring systems performance report and-or summary report form to the Administrator semiannually, except when: more frequent reporting is specifically required or the Administrator, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th day following the end of each six-month period.	n/a
STREAMLINED REQUIREMENTS		
	The recordkeeping requirements in the SDAPCD NSR permit and 40 CFR Part 75 §75.57(a), (b), and (d) are the most stringent and therefore the streamlined requirements. The other requirements are subsumed.	

(B) SOx EMISSIONS FROM GAS TURBINE

Step One: Identification of multiple requirements

#	Requirement	Equivalent Limit (% volume SO2 @ 15% O2)
1	**• SDAPCD NSR; Condition 2** The unit shall be fired on Public Utility Commission (PUC) quality natural gas. The permitee shall maintain quarterly records of sulfur content (grains/100 dscf) and the lower heating values (Btu/scf) of the natural gas and provide such records to the District personnel upon request. *NOTE:* *PUC/SDG&E Rule 30(I)(2)(e) limits the Total Sulfur in PUC quality natural gas to 0.75 grain per 100 scf.* *This inherently limits the SOx emissions as calculated below.* **Convert Limit to % Volume @ 15% O2 for Comparison to Other Limits** From 40CFR75, Appendix D, Formula 1-Dh ER (lb SO2/MMBtu) = [2.0/7000]x[10EE6]x[S_{total}/GCV] where S_{total}= Total sulfur in fuel, gr/100 scf and GCV= Gross Calorific Value, Btu/100 scf ER =(2.0/7000)x10EE6x(0.75/(1020x100)) = 0.0021 lb/MMBtu SO2 (% volume @ 15% O2) = SO2 (lb/MMBtu) *[(20.9-15)/(20.9)]*[VM/(MW*Fd)] where VM= Molar Volume=359 dscf/mole, MW=Molecular Weight of SO2=64, F_d=8710 dscf/MMBtu SO2 (% volume @ 15% O2) = 0.21 * (5.9/20.9)*359/(64*8710) SO2 (% volume @ 15% O2) = 0.000038 % Equivalent Limit = 0.000038% volume SO2 @ 15% O2	**0.000038**
2	**• SDAPCD Rule 53(d)(1)** A person shall not discharge into the atmosphere from any single source of emission whatsoever Sulfur compounds calculated as sulfur dioxide (SO2) in excess of 0.05 percent, by volume, on a dry basis.	**0.05**
3	**• SDAPCD Regulation X, Subpart GG** *(See below for 40 CFR 60 applicable requirement; Rule is the equivalent of 40 CFR 60 incorporated by reference.)*	**0.015**
4	**• 40 CFR Part 60 Subpart GG §60.333(a)** No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any stationary gas turbine any gases which contain sulfur dioxide in excess of 0.015 percent by volume at 15 percent oxygen and on a dry basis.	**0.015**

Step Two: Determine most stringent SOx emission limit

#	Requirement	Equivalent Limit (% volume SO2 @ 15% O2)
2	• SDAPCD Rule 53(d)(1)	0.05

3	• SDAPCD Regulation X, Subpart GG	0.015
4	• 40 CFR Part 60 Subpart GG §60.333(a)	0.015
1	• SDAPCD NSR; Condition 2	0.000038
STREAMLINED REQUIREMENTS		
	The SOx emission limit resulting from the SDAPCD NSR permit Condition 2 is the most stringent of the multiple requirement and is therefore the streamlined requirement. All other requirements are subsumed.	

Step Three: Evaluate work practice requirements

	Requirement	**Condition No.**
	• SDAPCD NSR; Condition 2 The unit shall be fired on Public Utility Commission (PUC) quality natural gas. The permitee shall maintain quarterly records of sulfur content (grains/100 dscf) and the lower heating values (Btu/scf) of the natural gas and provide such records to the District personnel upon request.	2
	• SDAPCD Rule 53: None	n/a
	• SDAPCD Regulation X, Subpart GG: None *(See below for 40 CFR 60 applicable requirement; Rule is the equivalent of 40 CFR 60 incorporated by reference.)*	n/a
	• 40 CFR Part 60 Subpart GG: None	n/a
STREAMLINED REQUIREMENTS		
	The work practice of only firing PUC quality natural gas directly supports the emission limit inherent in the SDAPCD NSR permit (and most stringent limit). The work practice in the SDAPCD NSR permit Condition 2 is considered to be the streamlined requirement. Any other work practice requirments are subsumed.	

Step Four: Evaluate monitoring requirements

	Requirement	**Condition No.**
	• SDAPCD NSR; Condition 2 The unit shall be fired on Public Utility Commission (PUC) quality natural gas. The permitee shall maintain quarterly records of sulfur content (grains/100 dscf) and the lower heating values (Btu/scf) of the natural gas and provide such records to the District personnel upon request.	2
	• SDAPCD Rule 53: None	n/a
	• SDAPCD Regulation X, Subpart GG: None *(See below for 40 CFR 60 applicable requirement; Rule is the equivalent of 40 CFR 60 incorporated by reference.)*	n/a
	• 40 CFR Part 60 Subpart GG: None	n/a

STREAMLINED REQUIREMENTS		
	The streamlined monitoring requirement will be the the monitoring requirement associated with the most stringent limit. The recordkeeping requirement associated with the SDAPCD NSR Permit Condition 2 will be the streamlined requirement. All other recordkeeping requirements are subsumed. *NOTE:* *The monitoring of the sulfur content and heating value is performed by the supplier/deliverer of the natural gas and records of these values are supplied to the end user.*	

Step Five: Evaluate recordkeeping / reporting

	Requirement	**Condition No.**
	• SDAPCD NSR; Condition 2 The unit shall be fired on Public Utility Commission (PUC) quality natural gas. The permitee shall maintain quarterly records of sulfur content (grains/100 dscf) and the lower heating values (Btu/scf) of the natural gas and provide such records to the District personnel upon request.	2
	• SDAPCD Rule 53: None	n/a
	• SDAPCD Regulation X, Subpart GG: None *(See below for 40 CFR 60 applicable requirement; Rule is the equivalent of 40 CFR 60 incorporated by reference.)*	n/a
	• 40 CFR Part 60 Subpart GG: None	n/a
	• SDPACD Regulation X Subpart A, Rule 260.4(b), 260.7(c) *(See below for 40 CFR 60 applicable requirement; Rule is the equivalent of 40 CFR 60 incorporated by reference.)*	n/a
	• 40 CFR Part 60 §60.4(b), §60.7(c) - Administrator to delegate to each State, when appropriate, the authority to implement and enforce standards of performance for new stationary sources located in such State. All information required to be submitted to EPA must also be submitted to the appropriate State Agency of any State to which this authority has been delegated (provided, that each specific delegation may except sources from a certain Federal or State reporting requirement). - Each owner or operator required to install a continuous monitoring device shall submit excess emissions and monitoring systems performance report and-or summary report form to the Administrator semiannually, except when: more frequent reporting is specifically required or the Administrator, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th day following the end of each six-month period.	n/a
	NOTE: *The SDAPCD has been delegated authority to implement and enforce NSPS requirements and therefore is the agency to which all information required under NSPS is submitted.*	n/a
STREAMLINED REQUIREMENTS		
	The streamlined recordkeeping requirement will be the the recordkeeping requirement associated with the most stringent limit. The recordkeeping requirement associated with the SDAPCD NSR permit Condition 2 will be the streamlined requirement. All other recordkeeping requirements are subsumed.	

(C) SULFUR CONTENT IN FUEL FOR GAS TURBINE

Step One: Identification of multiple requirements

#	Requirement	Equivalent Limit (grain Sulfur/100 scf NG)
1	**• SDAPCD NSR; Condition 2** The unit shall be fired on Public Utility Commission (PUC) quality natural gas. The permitee shall maintain quarterly records of sulfur content (grains/100 dscf) and the lower heating values (Btu/scf) of the natural gas and provide such records to the District personnel upon request. *NOTE:* *PUC/SDG&E Rule 30(I)(2)(e) limits the Total Sulfur in PUC quality natural gas to 0.75 grain per 100 scf.*	**0.75**
2	**• SDAPCD Rule 62(b)(1)** A person shall not operate any stationary fuel-burning equipment subject to this rule unless any gaseous fuel used contains no more than 10 grains of sulfur compounds, calculated as hydrogen sulfide, per 100 cubic feet of dry gaseous fuel (0.23 grams of sulfur compounds, calculated as hydrogen sulfide, per cubic meter of dry gaseous fuel), at standard conditions.	**10**
3	**• SDAPCD Regulation X Subpart GG** (See below for 40 CFR 60 applicable requirement; Rule is the equivalent of 40 CFR 60 incorporated by reference.)	**241**
4	**• 40 CFR Part 60 Subpart GG §60.333(b)** No owner or operator subject to the provisions of this subpart shall burn in any stationary gas turbine any fuel which contains total sulfur in excess of 0.8 percent by weight (8000 ppmw). **Convert to Grains Sulfur/100 SCF Natural Gas for Comparison to Other Limits** 0.8 percent weight total sulfur = 0.008 lb Sulfur/lb Natural Gas (0.008 lb Sulfur/lb NG) x (0.043 lb NG/scf NG) x (7000 grain Sulfur/1b Sulfur) x (100 scf NG/100 scf NG) = 241 grains Sulfur / 100 scf NG	**241**

Step Two: Determine most stringent limit for sulfur content in fuel

#	Requirement	Equivalent Limit (grain Sulfur/100 scf NG)
4	• 40 CFR Part 60 Subpart GG §60.333(b)	241
3	• SDAPCD Regulation X Subpart GG	241
2	• SDAPCD Rule 62(b)(1)	10
1	• SDAPCD NSR; Condition 2	0.75
STREAMLINED REQUIREMENTS		
	The most stringent limit is the SDAPCD NSR permit Condition 2 limit requiring PUC natural gas firing. All other requirements are subsumed.	

Step Three: Evaluate work practice requirements		
	Requirement	**Condition Number**
	• **SDAPCD NSR; Condition 2** The unit shall be fired on Public Utility Commission (PUC) quality natural gas. The permitee shall maintain quarterly records of sulfur content (grains/100 dscf) and the lower heating values (Btu/scf) of the natural gas and provide such records to the District personnel upon request.	**2**
	• **SDAPCD Rule 62: None**	n/a
	• **SDAPCD Regulation X, Subpart GG: None** *(See below for 40 CFR 60 applicable requirement; Rule is the equivalent of 40 CFR 60 incorporated by reference.)*	n/a
	• **40 CFR Part 60 Subpart GG: None**	n/a
STREAMLINED REQUIREMENTS		
	The work practice of only firing PUC quality natural gas directly supports the emission limit inherent in the SDAPCD NSR permit (and most stringent limit). The work practice in the SDAPCD NSR permit Condition 2 is considered to be the streamlined requirement. Any other work practice requirments are subsumed.	

Step Four: Evaluate monitoring requirements		
	Requirement	**Condition Number**
	• **SDAPCD NSR; Condition 2** The unit shall be fired on Public Utility Commission (PUC) quality natural gas. The permitee shall maintain quarterly records of sulfur content (grains/100 dscf) and the lower heating values (Btu/scf) of the natural gas and provide such records to the District personnel upon request.	**2**
	• **SDAPCD Rule 62: None**	n/a
	• **SDAPCD Regulation X, Subpart GG: None** *(See below for 40 CFR 60 applicable requirement; Rule is the equivalent of 40 CFR 60 incorporated by reference.)*	n/a
	• **40 CFR Part 60 Subpart GG: None**	n/a
STREAMLINED REQUIREMENTS		
	The streamlined monitoring requirement will be the the monitoring requirement associated with the most stringent limit. The recordkeeping requirement associated with the SDAPCD NSR permit Condition 2 will be the streamlined requirement. All other recordkeeping requirements are subsumed. *NOTE:* *The monitoring of the sulfur content and heating value is performed by the supplier/deliverer of the natural gas and records of these values are supplied to the end user.*	

Step Five: Evaluate recordkeeping / reporting		
	Requirement	**Condition Number**
	• SDAPCD NSR; Condition 2 The unit shall be fired on Public Utility Commission (PUC) quality natural gas. The permitee shall maintain quarterly records of sulfur content (grains/100 dscf) and the lower heating values (Btu/scf) of the natural gas and provide such records to the District personnel upon request.	**2**
	• SDAPCD Rule 62: None	n/a
	• SDAPCD Regulation X, Subpart GG: None *(See below for 40 CFR 60 applicable requirement; Rule is the equivalent of 40 CFR 60 incorporated by reference.)*	n/a
	• 40 CFR Part 60 Subpart GG: None	n/a
	• SDAPCD Regulation X Subpart A, Rule 260.4(b), 260.7(c): *(See below for 40 CFR 60 applicable requirement; Rule is the equivalent of 40 CFR 60 incorporated by reference.)*	n/a
	• 40 CFR Part 60 §60.4(b), §60.7(c) - Administrator to delegate to each State, when appropriate, the authority to implement and enforce standards of performance for new stationary sources located in such State. All information required to be submitted to EPA must also be submitted to the appropriate State Agency of any State to which this authority has been delegated (provided, that each specific delegation may except sources from a certain Federal or State reporting requirement). - Each owner or operator required to install a continuous monitoring device shall submit excess emissions and monitoring systems performance report and-or summary report form to the Administrator semiannually, except when: more frequent reporting is specifically required or the Administrator, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th day following the end of each six-month period. *NOTE: The SDAPCD has been delegated authority to implement and enforce NSPS requirements and therefore is the agency to which all information required under NSPS is submitted.*	n/a
STREAMLINED REQUIREMENTS		
	The streamlined recordkeeping requirement will be the the recordkeeping requirement associated with the most stringent limit. The recordkeeping requirement associated with the SDAPCD NSR Permit Condition 2 will be the streamlined requirement. All other recordkeeping requirements are subsumed.	

San Diego County Air Pollution Control District
10124 Old Grove Road San Diego CA 92131-1649
(858) 586-2600 FAX (858) 586-2601

TITLE V APPLICATION
Permit Shield (FORM 1401-Q)

Company Name	District Use Only
SAN DIEGO GAS & ELECTRIC (ELECTRIC GENERATION)	NEDS #
Facility Address: 2300 HARVESON PLACE, SD1473, ESCONDIDO, CA 92029	SITE ID #

REQUEST FOR PERMIT SHIELD

If more space is required, use additional forms. Please type or print legibly.

Application No(s) Permit No(s)	Requirements to be Shielded	Basis	Attachment Number
TVP-00038	SDCAPCD RULE 52 (Particulate Matter)	Not applicable, per Section (a), Rule 53 applies turbines	
TVP-00038	SDCAPCD RULE 53(d)(1) (Specific Contaminants)	Subsumed. (See Attachment O-1 re: MARS)	O-1
TVP-00038	SDCAPCD RULE 54 (Dust & Fumes)	Not applicable as Section (b) exempts gaseous fuesl burning	
TVP-00038	SDAPCD Rule 62 (Sulfur Content of Fuels)	Subsumed. (See Attachment O-1 re: MARS)	O-1
TVP-00038	SDCAPCD RULE 68 (Fuel Burning Equipment - NOx)	Not applicable per R69.3 (not subject to R68 and R69.3)	
TVP-00038	SDCAPCD RULE 69.2 (Boilers, Heaters, Steam Generators)	Not applicable - exemption per 69.2(b)(ii)	
TVP-00038	SDCAPCD RULE 69.3 (Stationary Gas Turbines	Subsumed. (See Attachment O-1 re: MARS)	O-1
TVP-00038	SDCAPCD Reg X, Subpart Db (Steam Generating Units)	Subsumed. (See Attachment O-1 re: MARS)	O-1
TVP-00038	SDCAPCD Reg X, Subpart GG (Stationary Gas Turbine)	Subsumed. (See Attachment O-1 re: MARS)	O-1
TVP-00038	40 CFR 60, Subpart Db - NSPS for Steam Generating Units	Subsumed. (See Attachment O-1 re: MARS)	O-1
TVP-00038	40 CFR 60, Subpart GG - NSPS for Stationary Gas Turbine	Subsumed. (See Attachment O-1 re: MARS)	O-1
TVP-00038	40 CFR 64 Compliance Assurance Monitoring (CAM)	CAM not required per Rule 69.3 and CEMS installation	

San Diego County Air Pollution Control District
10124 Old Grove Road San Diego CA 92131-1649
(858) 586-2600 FAX (858) 586-2601

TITLE V APPLICATION
Abatement Devices (FORM 1401-M)

Company Name	District Use Only
San Diego Gas & Electric (Electric Generation)	NEDS #
Facility Address: 2300 Harveson Pl, Escondido, CA 92029	SITE ID #

LIST OF ABATEMENT DEVICES

In numerical order, list all abatement devices, the abatement device, name or description, and the emission unit or operation abated. **If more space is required, use additional forms. Please type or print legibly.**

Permit No(s)	Abatement Device Name or Description	Emission Unit(s) or Operation(s) Abated
000623	Selective Catalytic Reduction System and Oxidation Catalyst	Gas Turbine
000625	Selective Catalytic Reduction System and Oxidation Catalyst	Gas Turbine

Facility Name: SDG&E - Palomar Energy Center
Facility ARB ID: 100362
Facility Reporting Year: 2015

Confidential Data Indication Set to "No" by Reporter

Certification Statement: The designated representative or alternate designated representative must sign (i.e., agree to) this certification statement. If you are an agent and you click on "SUBMIT", you are not agreeing to the certification statement, but are submitting the certification statement on behalf of the designated representative or alternate designated representative who is agreeing to the certification statement. An agent is only authorized to make the electronic submission on behalf of the designated representative, not to sign (i.e., agree to) the certification statement.

Facility Representatives

Designated Representative: HASHIM NAVROZALI
Agent: Greg Hauser

Facility Location

Physical Address: 2300 Harveson Place
City: Escondido
State / Province: CA
ZIP / Postal Code: 92029
Country:

Latitude: 33.1194
Longitude: -117.1174

County: SAN DIEGO
Air Basin: SAN DIEGO
District: SAN DIEGO COUNTY APCD

Mailing Address: 8315 CENTURY PARK COURT, CP21E
City: SAN DIEGO
State / Province: CA
ZIP / Postal Code: 92123
Country: USA

Payment Information (required if subject to AB 32 Cost of Implementation Fee Regulation)

Responsible Party for Payment: HASHIM NAVROZALI
Responsible Party Email: hnavrozali@semprautilities.com
Responsible Party Phone: 858-650-4087
Billing Address: 8315 CENTURY PARK COURT, CP21E
City: SAN DIEGO
State / Province: CA
ZIP / Postal Code: 92123
Country: USA

Owners / Operators

Name: SAN DIEGO GAS & ELECTRIC

GHG Quantity

CO2 equivalent emissions, excluding biogenic (subparts C – AA): 1,151,864.1218 Metric Tons
Exempt biogenic CO2 emissions (subparts C – AA): 0 Metric Tons
CO2 equivalent emissions from fuel supplier categories, excluding biogenic (subparts MM – NN): 0 Metric Tons
Exempt biogenic CO2 emissions from fuel supplier categories (subparts MM – NN): 0 Metric Tons
CO2 emissions from CO2 Suppliers (excluding biogenic) (subpart PP): 0 Metric Tons
Exempt biogenic CO2 emissions from CO2 Suppliers (subpart PP): Metric Tons
CO2 equivalent emissions from electric power entities: 0 Metric Tons
Covered CO2 equivalent emissions: 1,151,864.1218 Metric Tons
De Minimis CO2 equivalent emissions: 0 Metric Tons
Maximum allowable De Minimis emissions: 20,000 Metric Tons

General Facility Reporting Information

NAICS Codes

Primary: 221112 (Fossil Fuel Electric Power Generation)
Second Primary:
Additional:

U.S. Parent Companies

Parent Company Name: SEMPRA ENERGY INC
Address: 488 8th Avenue, San Diego, CA 92101
Percentage of Ownership Interest: 100%

GHG Report Start Date: 2015-01-01
GHG Report End Date: 2015-12-31
Explanation of any calculation methodology changes during the reporting year:

EPA e-GGRT Facility IDs

521655

Full or Abbreviated GHG Report: Full
Company or Entity qualifies for Small Business Status: No
Are you applying for legacy contract transition assistance under the cap-and-trade program [95894]?: No

Electricity Purchases/Acquisitions for Reporting Facilities (95104(d))

Electricity Provider's Name: San Diego Gas & Electric
Provider's ARB ID: 3004

Purchases/Acquisitions (MWh): 41,880

Natural Gas Purchases/Acquisitions for Reporting Facilities [95115(k), 95103(a)(1)]

Natural Gas Supplier Name: San Diego Gas and Electric - Local Distribution
Supplier's ARB ID: 104085
Customer Number: None
Purchases/Acquisitions (MMBtu): 21,344,650
Was this natural gas received directly from an interstate pipeline? No

Increases and Decreases in Facility Emissions [95104(f)]:

Have facility emissions increased or decreased more than five percent in relation to the previous data year? Yes
Change in production: Yes
Changes in facility operations in order to comply with:
- The cap-and-trade regulation: No
- Other air pollution regulations: No
- Other regulations, not related to air pollution or greenhouse gases: No

Changes in efficiency due to:
- Process or material changes: No
- The addition of control equipment: No
- Other efficiency measures: No

Other reason(s) for increase or decrease: No
Provide a narrative description of how each reason identified in section 95104(f)(2) caused the increase or decrease in emissions. Include in this description any changes in your air permit status: GHG emissions increased in 2015 due to higher demand for produced energy.
Note: This section is not subject to the third-party verification requirements

Electricity Generation

Facility has the capacity to generate electricity: Yes
CEC ID (if applicable): G0681
EIA ID (if applicable): 55985
FERC QFID (if applicable): N/A
CAISO ID (if applicable): PLOMR_2_PL1X3
Total Facility Nameplate Generating Capacity: 550 MW
Facility Type: Stand-alone electricity generating facility
Facility's Energy Disposition: Grid-dedicated facility

Disposition of Generated Electricity [95112(a)(4)]

Generated Electricity for Grid Disposition [95112(a)(4)(A)]
Unit, System Or Group Name CT1 & CT2

Retail Provider/Marketer Name San Diego Gas & Electric (SDG&E)
Electricity Provided or Sold (MWh) 3,002,949
Generated electricity used for other on-site industrial processes that are not in support of or a part of the power generation system: 0 MWh

Reported emissions include emissions from a cogeneration/bigeneration unit: No
Parasitic Steam Use: Generated thermal energy used for supporting power production (excluding steam used directly for generating electricity) [95112(a)(5)(B)]:

Generated thermal energy for on-site industrial applications not related to electricity generation [95112(a)(5)(C)]:

Description of the excluded data and an estimated magnitude of the excluded product(s) using best available methods [95103(l)]:

Subpart D: Electricity Generation

Gas Information Details

Gas Name	**Gas Quantity** (Metric Tons)
Methane	21.34465
Nitrous Oxide	2.134465
Carbon Dioxide	1,150,754.20
Exempt Biogenic Carbon dioxide	0
Total CO2e	1,151,864.12

Annual CO2 emissions from sorbent injection: 0 (Metric Tons)

Total Covered CO2e Emissions: 1,151,864.1218 (Metric Tons)

Emissions shown above that are claimed as De Minimis (CO2e): 0 Metric Tons

Unit Details
Unit Name: CT1
Unit Type: Electricity Generator
Unit Description: Natural Gas Combustion Turbine, combined cycle
Part 75 Methodology: Appendix G, Equation G-4
Methodology Start Date: 2013-01-01
Methodology End Date: 2015-12-31

Is this unit/stack/pipe in the Acid Rain Program? Yes
Is this configuration a Part 75 unit? Yes

Electricity Generating Unit Information

Nameplate Generating Capacity: 275 MW
Prime Mover Technology: Combined Cycle
Type of Thermal Energy Generation: Electricity only EGU
95112(b)(2): Gross Generation: 1,585,010 MWh
95112(b)(2): Net Generation: 1,520,182 MWh
95112(b)(3): Total Thermal Output (for Cogeneration or Bigeneration):
95112(b)(8): Other Steam Used for Electricity Generation:
Additional Comments and Information:

Total Annual CO2 Mass Emissions

Annual CO2 Emissions Including Biomass: 585,190 metric tons
Annual CO2 Emissions (Fossil Fuels Only): 585,190 metric tons
Annual CO2 emissions generated from sorbent injection: 0 metric tons
Annual Exempt Biogenic CO2 Emissions: 0 metric tons

Missing Data Information

Total number of source operating hours in the reporting year that fuel flow rate was missing: 0
Total number of source operating hours in the reporting year that high heating value was missing: 0

Fuel-Specific CH4 and N2O Emissions Information

Fuel: Natural Gas

Annual Mass or Volume of Fuel Combusted: 10,396,067,530 short tons, scf, or gallons
CH4 Emissions: 10.85435 metric tons
N2O Emissions: 1.085435 metric tons
Total CO2e for CH4: 227.94135 metric tons
Total CO2e for N2O: 336.48485 metric tons

Equation Inputs

Cumulative Annual Heat Input from fuel combustion: 10,854,350 mmBtu
Fuel Specific CH4 Emission Factor: 0.001 kg/mmBtu
Fuel Specific N2O Emission Factor: 0.0001 kg/mmBtu

Unit Name: CT2
Unit Type: Electricity Generator

Unit Description: Natural gas combustion turbine, combined cycle
Part 75 Methodology: Appendix G, Equation G-4
Methodology Start Date: 2013-01-01
Methodology End Date: 2015-12-31
Is this unit/stack/pipe in the Acid Rain Program? Yes

Is this configuration a Part 75 unit? Yes

Electricity Generating Unit Information

Nameplate Generating Capacity: 275 MW
Prime Mover Technology: Combined Cycle
Type of Thermal Energy Generation: Electricity only EGU
95112(b)(2): Gross Generation: 1,547,974 MWh
95112(b)(2): Net Generation: 1,482,767 MWh
95112(b)(3): Total Thermal Output (for Cogeneration or Bigeneration):
95112(b)(8): Other Steam Used for Electricity Generation:
Additional Comments and Information:

Total Annual CO2 Mass Emissions

Annual CO2 Emissions Including Biomass: 565,564.2 metric tons
Annual CO2 Emissions (Fossil Fuels Only): 565,564.2 metric tons
Annual CO2 emissions generated from sorbent injection: 0 metric tons
Annual Exempt Biogenic CO2 Emissions: 0 metric tons

Missing Data Information

Total number of source operating hours in the reporting year that fuel flow rate was missing: 0
Total number of source operating hours in the reporting year that high heating value was missing: 0

Fuel-Specific CH4 and N2O Emissions Information

Fuel: Natural Gas

Annual Mass or Volume of Fuel Combusted: 10,045,113,430 short tons, scf, or gallons
CH4 Emissions: 10.4903 metric tons
N2O Emissions: 1.04903 metric tons
Total CO2e for CH4: 220.2963 metric tons
Total CO2e for N2O: 325.1993 metric tons

Equation Inputs

Cumulative Annual Heat Input from fuel combustion: 10,490,300 mmBtu
Fuel Specific CH4 Emission Factor: 0.001 kg/mmBtu
Fuel Specific N2O Emission Factor: 0.0001 kg/mmBtu

Time And Date Report Generated: 04/06/2016 14:03

GHG POTENTIAL TO EMIT ESTIMATES FOR PALOMAR ENERGY CENTER

Total Actual Emissions for the 2015 Calendar Year (Pursuant to the Mandatory AB32 GHG Report to CARB – see attached summary):

Unit – CT1

Total GHG (CO_2e) = 585,754 metric tons = 645,683 short tons
The GHG emissions reported for 2015 were based on a turbine run time of 6,413 hours
The Permits to Operate (PTO) for CT1 does not have any annual run time limit for the turbine
The GHG Potential to Emit for CPEP can be estimated by prorating the emissions to the maximum operating scenario of 8,760 hrs/yr as calculated below:
GHG Potential to Emit = (645,683 tons/yr) x (8,760 hrs / 6,413 hrs) = *881,987 tons CO_2e per year*

Unit – CT2

Total GHG (CO_2e) = 566,110 metric tons = 624,029 short tons
The GHG emissions reported for 2015 were based on a turbine run time of 6,207 hours
The Permits to Operate (PTO) for CT2 does not have any annual run time limit for the turbine
The GHG Potential to Emit for CPEP can be estimated by prorating the emissions to the maximum operating scenario of 8,760 hrs/yr as calculated below:
GHG Potential to Emit = (624,029 tons/yr) x (8,760 hrs / 6,207 hrs) = *880,698 tons CO_2e per year*

Total PTE (CT1 & CT2 combined): 881,987 + 880,698 = **1,762,685 tons CO_2e per year**

THIS CHECK CONTAINS MULTIPLE FRAUD DETERRENT SECURITY FEATURES. DO NOT ACCEPT UNLESS BLUE AND GREEN ARE PRESENT.

SDGE

A Sempra Energy utility®

P.O. Box 129007, San Diego, CA 92112-9007

ACCOUNTS PAYABLE

Wachovia Bank, N.A.
Savannah, GA 31603

64-975
612

VENDOR NO	CHECK NO	DATE	AMOUNT
442	1387499	06/26/17	*****$8,945.00

PAY: EIGHT THOUSAND NINE HUNDRED FORTY-FIVE USD

TO THE ORDER OF:
AIR POLLUTION CONTROL DISTRICT
SAN DIEGO COUNTY
10124 OLD GROVE RD
SAN DIEGO CA 92131

VOID AFTER SIX MONTHS

THE BACK OF THIS DOCUMENT HAS A WATERMARK - HOLD AT ANGLE TO VIEW

⑈0138749⑈ ⑆061209756⑆ 2079900416477⑈

SDGE

A Sempra Energy utility®

PLEASE RETAIN THIS STATEMENT FOR YOUR RECORDS

FOR QUESTIONS REGARDING THESE PAYMENTS,
PLEASE CALL (858) 503-5480

ACCOUNTS PAYABLE

P.O. Box 129007, San Diego, CA 92112-9007

NAME	Vendor No	Check No	Date	Amount
AIR POLLUTION CONTROL DISTRICT	442	1387499	06/26/17	****$8,945.00

YOUR REFERENCE	DATE	PO	ITEM	VOUCHER	GROSS	DISCOUNT	AMOUNT PAID
PERMOT RENEWAL	06/19/17			1900382777	8,945.00	0.00	8,945.00