South Coast Air Quality Management District

Statement of Basis

Proposed Initial Title V Permit

Facility Name:	Palen Solar Electric Generation Station
Facility ID:	174021
SIC Code:	221114
Equipment Location:	Corn Spring Road Desert Center, CA 92239
Application #(s):	549399
Application Submittal Date(s):	04/04/2013
AQMD Contact Person:	Roy Olivares
Phone Number:	(909) 396-2208
E-Mail Address:	rolivares@aqmd.gov

---

1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO_2, SO_2, and lead are in attainment with federal standards. The status of CO is currently serious nonattainment, but SCAQMD has petitioned to EPA for redesignation to attainment status. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A intial Title V renewal permit is proposed to be issued to cover the operations of Palen Solar Electrict Generating Station, Corn Spring Road, Desert Center, CA 92239. This facility is subject to Title V requirements because it is subject to Title IV Acid Rain Provisions.

2. Facility Description

This is a new facility applying for a initial Title V Permit. The proposed facility will provide electricity to the electrical grid. This facility is proposing to install 4 boilers, 2 SCR control systems, 3 diesel fueled ICEs driving emergency electrical and 3 emergency diesel fueled fire pumps.

3. Construction and Permitting History

The proposed facility has no compliance History

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the SCAQMD with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. This facility is subject to NSPS or NESHAP requirements.

Boilers- rated at 249 mmbtu/hr

40 CFR 60 Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. The applicable NOx emissions limit and monitoring requirements have been added as permit conditions, see permit evaluation.

40 CFR Part 63, Subpart JJJJJJ—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources. The boilers use natural gas as a fuel and is not subject to this Regulation.

Boilers- rated at 10.5 mmbtu/hr

40 CFR Part 60, Subpart Dc--Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. The Standard permit conditions for this equipment has been added as permit conditions, see permit evaluation.

40 CFR Part 63, Subpart JJJJJJ—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources. The boilers use natural gas as a fuel and is not subject to this Regulation.

Emergency engines

The emergency engines are subject to NSPS Title 40 Part 60 subpart IIII and 40 CFR Part 63 Subpart ZZZZ. The Standard permit conditions for this equipment has been added as permit conditions, see permit evaluation

5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in

the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources (July 2001).

6. Permit Features

Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

7. Summary of Emissions and Health Risks

Criteria Pollutant Emissions (tons/year)
Expected Annual Emissions

Pollutant	Emissions (tons/year)
NOx	8.01
CO	13.98
VOC	1.58
PM10	2.10
SOx	0.76

Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Period

The Following TACs Were Reported	Emissions (lbs/yr)
n/a	n/a

No Criteria or TAC emissions have been reported

Health Risk from Toxic Air Contaminants

The facility is not subject to review by the Air Toxics Information and Assessment Act (AB2588), new facility.

8. Compliance History

New facility, no compliance History at this time

9. Compliance Certification

By virtue of the Title V permit application and issuance of this Title V Inital permit, the reporting frequency for compliance certification for the facility shall be annual.