

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Renewal Permit

Facility Name: Harbor Cogeneration Company, LLC
Facility ID: 156741
SIC Code: 8221
Equipment Location: 505 Pier B Ave
Wilmington, CA 90744

Application #(s): 544455
Application Submittal Date(s): 10/31/2012

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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.

Pursuant to Title V of the federal Clean Air Act and SCAQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and requested the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

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. NO₂, SO₂, CO and lead are in attainment with federal standards. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment. A Title V renewal permit is proposed to be issued to Harbor Cogeneration Company, LLC (HCC). This facility is subject to Title V requirements because it is a major source.

2. Facility Description

HCC is an existing power generation facility located in the Port of Long Beach industrial complex. The facility operates a natural gas fired combined cycle gas turbine and associated air pollution control equipment. The facility operates to supply power to the electrical grid on a demand basis and operates in combined cycle.

3. Construction and Permitting History

An initial Title V permit was issued to the facility on 8/21/2001. The last Title V Permit renewal was issued on 5/13/2008, and there has been three subsequent permit revisions issued to this facility in the last five years.

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 District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found as follows.

Combined Cycle Gas Turbine

40 CFR 63 Subpart YYYYY applies to all stationary gas turbines located at a major source of HAP emissions. A major source of HAP emissions is a source that emits or has the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year. The total HAP emission rate from this facility is less than 25 Tons/year and the emission rate of any single HAP is less than 10 tons/year. Therefore, 40 CFR 63 Subpart YYYYY is not applicable to this facility

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). The federal Compliance Assurance Monitoring (CAM) requirements apply to stationary sources that (1) are equipped with post-process control devices, (2) have pre-control device emissions equal to or greater than 100 percent of the major source thresholds and (3) are subject to the Title V Permit program. The gas turbine is equipped with a continuous emission monitoring system (CEMS) which will monitor and report emissions of NOx and CO. As such the CAM requirements are satisfied.

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) Annual Reported Emissions for Reporting Period 2012

Pollutant ID	Pollutant Description	Annual Emissions
CO	Carbon Monoxide	3.109
NOX	Nitrogen Oxides	3.109
ROG	Reactive Organic Gases	0.578
SOX	Sulfur Oxides	0.147
TSP	Total Suspended Particulates	0.329

Toxic Air Contaminants Emissions (TAC) Annual Reported Emissions for Reporting Period 2012 Annual Emissions in lb/year

Pollutant ID	Pollutant Description	Annual Emissions
106990	1,3-Butadiene	0.143
7664417	Ammonia	3214.204
71432	Benzene	4.001
50000	Formaldehyde	45.917
91203	Naphthalene	0.436
1151	PAHs, total, with components not reported	0.301

Health Risk from Toxic Air Contaminants

The facility is being tracked by the Air Toxics Information and Assessment Act (AB2588).

8. Compliance History

The facility was issued two Notices to Comply issued within the past 3 years. NC D12212 and NC E01210 were issued to request the applicant to provide additional compliance data. The facility is currently in compliance.

9. Compliance Certification

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