
***MOJAVE DESERT
AIR QUALITY MANAGEMENT DISTRICT***

Preliminary Determination/Decision - Statement of Basis
for
Significant Modification of

FOP Number: 104701849

For:

High Desert Power Project, LLC

Facility Address:

**19000 Perimeter Road
Victorville, CA 92394**

Document Date: November 13, 2023

Submittal date to EPA/CARB for review: November 13, 2023

EPA/CARB 45-day Commenting Period ends: January 3, 2024

Public Notice Posted: November 13, 2023

Public Commenting Period ends: December 14, 2023

Permit Issue date: January 17, 2024

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A. Introduction

1. Application and Setting

BACKGROUND:

High Desert Power Project, LLC, (HDPP) is currently a nominal 750 MW natural gas fired combined cycle power generating plant located in Victorville, California and operates under Federal Operating Permit (FOP) number 104701849. The plant uses three F-Class Westinghouse combustion turbine generators (CTGs) with dedicated heat recovery steam generators (HRSGs) to produce electricity. Inlet air to the CTGs is filtered and conditioned, with cooling water supported by a mechanical draft wet cooling tower. Compressed air and natural gas are mixed and combusted in the turbine combustion chamber. Lean pre-mixed air and low NO_x combustors are used to minimize NO_x formation during combustion. Exhaust gas heat from each CTG is recovered in a dedicated HRSG, in which steam is produced to drive a dedicated condensing steam turbine generator (STG) connected to an electric power generator. Each HRSG is equipped with a natural gas-fired duct burner to provide supplementary firing during high ambient temperatures to maintain constant steam production to the STG. A Selective Catalytic Reduction (SCR) system to control NO_x emissions and high temperature oxidation catalyst to control CO and VOC emissions are located inside each HRSG.

The STG exhaust steam is routed for condensing to a surface condenser with water pumped in from a twelve-cell wet cooling tower by circulating water pumps. Make-up water to the circulating water system is clarified raw water supply. Blowdown from the cooling tower side stream treatment system drains into a wastewater brine storage tank. Treated water is recycled to the cooling tower or discharged to underground injection wells. The facility includes two diesel-fired internal combustion engines, one that is used to drive an emergency fire pump and one that is used to drive an emergency power generator and two silos containing soda ash and lime which provide chemical feed for the cooling tower blowdown system.

The facility is located in a “Zone A” area as defined by Rule 1201(S)(1) which means that the area is designated Federal Severe-17 Non-attainment for Ozone.

POLLUTANT	STATE AREA DESIGNATION	FEDERAL AREA DESIGNATION
OZONE Precursors: NO _x , VOC	NONATTAINMENT	NONATTAINMENT
NO ₂	ATTAINMENT	UNCLASSIFIED/ATTAINMENT
CO	ATTAINMENT	UNCLASSIFIED/ATTAINMENT
PM ₁₀ Precursors: SO _x , NO _x , VOC	NONATTAINMENT	NONATTAINMENT
PM _{2.5}	NONATTAINMENT	UNCLASSIFIED/ATTAINMENT
SO ₂	ATTAINMENT	UNCLASSIFIED

HDPP is a Major Facility because the facility has the “Potential to Emit (PTE)” in excess of the thresholds for Oxides of Nitrogen (NOx), Volatile Organic Compounds (VOC), Particulate Matter less than 10 microns in size (PM10) and Carbon Monoxide (CO) as defined by Rule 1201(S)(1) and also Rule 1301(II).

POLLUTANT	POTENTIAL TO EMIT	NSR MAJOR SOURCE THRESHOLD	NSR STATUS	TITLE V MAJOR SOURCE THRESHOLD	TITLE V STATUS
NOx	205	25	MAJOR	25	MAJOR
VOC	129	25	MAJOR	25	MAJOR
PM10	233.2	100	MAJOR	100	MAJOR
SOx	14	100	MINOR	100	SM80
CO	750	100	MAJOR	100	MAJOR
HAP		10 ANY HAP 25 ANY COMBINATION OF HAP	MINOR/AREA	10 ANY HAP 25 ANY COMBINATION OF HAP	SM80

2. Description of Project

The facility has submitted an application on August 11, 2023 to add a new diesel fueled emergency engine. A copy of the application package can be viewed in Appendix A.

The proposed permitting action constitutes a Significant Modification to the Federal Operating Permit (FOP). Pursuant to section (B)(2) of District Rule 1205 – Modifications of Federal Operating Permits, this document serves as the preliminary determination to issue the modified FOP, inclusive of the proposed changes.

This preliminary decision/determination will be submitted to USEPA, CARB, and the public for review and comment. Please refer to the cover page of this document for the noticing and comment period timeframes.

B. Title V Permit/FOP

1. Proposed Changes to FOP

The proposed changes to the FOP are indicated in the red-line version of the draft. Additionally, a description and explanation of those changes are indicated below:

PART I: INTRODUCTORY INFORMATION

This section of the Federal Operating Permit contains general information about the HDPP facility, including facility identifying information (section A), a description of the facility (section B), and a description of the facility’s equipment (section C).

Changes made to this section of the FOP:

- Revised facility description to include new emergency generator
- Revised permitted equipment table to include new emergency generator

PART II: FACILITYWIDE APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; COMPLIANCE PLANS

This section of the Federal Operating Permit contains requirements applicable to the entire facility and equipment (section A), facility-wide monitoring, recordkeeping, and reporting requirements (section B), and facility-wide compliance conditions (section C).

Changes made to this section of the FOP:

- none

PART III: EQUIPMENT SPECIFIC APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; COMPLIANCE PLANS

This section of the Federal Operating Permit contains equipment-specific applicable requirements including emission limitations, monitoring and recordkeeping, reporting and testing, and compliance plans.

Changes made to this section of the FOP:

- Page III-48, added new permit unit E014847

PART IV: STANDARD FEDERAL OPERATING PERMIT CONDITIONS

No changes were made to this section

PART V: OPERATIONAL FLEXIBILITY

No changes were made to this section

PART VI: ACID RAIN PERMIT

- Formatting change to accommodate ADA compliance

PART VII: CONVENTIONS, ABBREVIATIONS, DEFINITIONS

Changes made to this section of the FOP:

- Updated SIP table

C. NSR Analysis

1. Determination of Emissions

The proposed new diesel internal combustion engine which powers an emergency generator will have the potential for emissions of NO_x, VOC, SO_x, PM₁₀ and CO as well as HAP in the form of diesel particulate matter.

Pursuant to Rule 1304(B), New Source Review Emission Calculations, emissions change is equal to the Potential to Emit minus the Historical Actual Emissions.

Emissions change = PTE - HAE

Because the equipment is new, HAE = 0 therefore there is an emission change for all pollutants equal to the PTE.

	LB/DAY					TON/YEAR				
	NO _x	VOC	SO _x	PM ₁₀	CO	NO _x	VOC	SO _x	PM ₁₀	CO
PTE E014847	0.81	0.07	0.04	0.13	0.67	8.39E-4	6.99E-5	3.69E-5	1.40E-4	6.99E-4

The facility is not requesting change to any of the facility-wide emissions limitations as shown below.

During the original permitting, the facility provided offsets for NO_x, VOC and PM₁₀. Pursuant to Rule 1304(C)(2)(d), because NO_x, VOC and PM₁₀ were previously offset in a prior, documented NSR permitting action, the HAE is equal to the PTE for those pollutants.

Table 1a – Maximum Annual Pollutant Emissions – Previously Offset Pollutants

Pollutant	Current Emissions Limitation	Proposed Emissions Limitation TPY
NO _x	204.5	204.5
VOC	128.5	128.5
PM ₁₀	232.7	232.7

Attainment pollutants SO_x and CO are treated differently than non-attainment pollutants NO_x, VOC and PM₁₀ under Regulation XIII. Offsets are not required for SO_x as the facility is not major for SO_x nor are they requesting an increase in PM₁₀ for which SO_x is considered a precursor.. Offsets are not required for CO as it is not a nonattainment pollutant. The respective SO_x and CO HAE are based on the averaged actual emissions for the previous five operational years.

Table 1b – Maximum Annual Pollutant Emissions – Attainment/Unclassified Pollutants

Pollutant	Current Emissions Limitation	Proposed Emissions Limitation TPY	Historical Actual Emissions	Emissions Increase
CO	192.8	192.8	78.6	114.2
SOx	15.8	15.8	7.9	7.9

The table above shows that there is an emissions increase for SOx and CO when quantified pursuant to Rule 1304, however BACT nor offsets apply to pollutants designated attainment/unclassified.

2. Determination of Requirements

a. BACT Evaluation

Best Available Control Technology (BACT) is required

- for each new Permit Unit that has a Potential to Emit 25 pounds or more per day of any Nonattainment Air Pollutant or its Precursors; or,
- when located at a new or Modified Facility that emits, or has the Potential to Emit, twenty-five (25) tons per year or more of any Nonattainment Air Pollutant or its Precursors (District Rule 1303(A)(3)).

Pursuant to Rule 1303, “any new or Modified Facility which emits, or has the Potential to Emit, 25 tons per year or more of any Nonattainment Air Pollutant shall be equipped with BACT for each new or Modified Permit Unit”. BACT is required on a pollutant specific basis and for HDPP is required for all new or Modified NOx, VOC and PM10 emission sources that require a permit. The facility is a Major Source for NOx, VOC, PM10 and CO.

Because the facility has a PTE over 25 tons/year for NOx, VOC and PM10 BACT is required for those pollutants as it pertains to the proposed new emergency engine. The following was determined to be BACT for stationary diesel emergency engines:

- SJVAPCD Guideline 3.1.1 EPA Tier IV Final Certification
- BAAQMD Guideline 96.1.3 – compliance with CARB ATCM standards

The proposed engine is a certified Tier IV Final and complies with the requirements of the Stationary ATCM and with 40 CFR 60 Subpart IIII.

b. Offsets Evaluation

Emission offsets are only required for non-attainment air pollutants and their precursors for new or Modified facilities that have a potential to emit greater than the offset amounts specified in

District Rule 1303(B). The facility limits exceed the offset thresholds for three non-attainment air pollutants only NOx, VOC and PM10; however, there are no net increases associated with any of these pollutants. HDPP is not a Modified Facility for NOx, VOC nor PM10 since there are no increases in emissions of those pollutants. Offsets are not required for SOx as the facility is not major for SOx nor are they requesting an increase in PM10 for which SOx is considered a precursor. Offsets are not required for CO as it is not a nonattainment pollutant.

3. Determination of Additional Federal Requirements

a. Alternative Siting

Pursuant to the requirements in District Rule 1302 B(1)(b), an analysis of Alternative Siting is not required as the proposed equipment does not require offsets as specified in Rule 1303(B).

b. Class I Area Visibility Protection

Pursuant to the requirements in District Rule 1302 B(1)(a)(v), an analysis of any anticipated impacts on visibility is not required as the proposed equipment does not qualify as an application for a new Major Facility, nor is it a Major Modification.

c. Prevention of Significant Deterioration (PSD)

HDPP operates under PSD permit SE 98-01 3/10. Please take notice that this regulation is not currently implemented by the MDAQMD because the USEPA has not delegated authority for the PSD Program to the MDAQMD at this time. However, per the language in the applicability procedures of 40 CFR 52.21 (a)(2)(i) and (ii), PSD applies to “any new major stationary source or the major modification of any existing major stationary source”. The proposed actions do not result in a new major stationary source and do not constitute a major modification of any existing major stationary source, the proposed significant modification is not subject to PSD.

d. Stack Height Analysis

Good Engineering Practice stack height 40 CFR 51.100(ii) means:

- a. 65 m
- b. for stacks in existence 1/12/79 calculated value
- c. height demonstrated by approved model or study

The engine stack are approximately 2 meters tall which is less than the 65 m height specified in 40 CFR 51.100(ii).

4. Determination of Requirements for Toxic Air Contaminants

- a. New or Modified Emission Units - *District Rule 1320* - New Source Review for Toxic Air Contaminants

The purpose of District Rule 1320 – New Source Review for Toxic Air Contaminants is to:

- Set forth the requirements for preconstruction review of all new, Modified, Relocated, or Reconstructed Facilities which emits or have the potential to emit any Hazardous Air Pollutant, Toxic Air Contaminant, or Regulated Toxic Substance; and

- Ensure that any new, Modified, or Relocated Emissions Unit is required to control the emissions of Toxic Air Contaminants as required pursuant to Chapter 3.5 of Part 2 of Division 26 of the California Health and Safety Code (commencing with §39650); and
- Ensure that any proposed new or Reconstructed Facility or Emissions Unit is required to control the emissions of Hazardous Air Pollutants as required under 42 U.S.C. §7412(g) (FCAA §112(g)).

Pursuant to District Rule 1320, Section (B)(2), any new or Modified Facility/Emissions Unit(s) are required to be analyzed to determine if any current, enforceable Airborne Toxic Control Measures are applicable. Also, as part of the State T-NSR analysis, three Emission Unit Prioritization Scores are required to be calculated for carcinogenic effects, non-carcinogenic acute effects and non-carcinogenic chronic effects. These scores are to be calculated utilizing the most recently approved CAPCOA Facility Prioritization Guidelines, the most recently approved OEHHA Unit Risk Factor for cancer potency factors, and the most recently approved OEHHA Reference Exposure Levels for non-cancer acute factors and non-cancer chronic factors. Finally, pursuant to section (B)(3) of District Rule 1320, any new or Modified Facility/Emissions Units which emits or has the potential to emit 10 tons per year or more of any single HAP, or emits or has the potential to emit 25 tons per year or more of any combination of HAPs, or has been designated an Air Toxic Area Source by USEPA (per 42 U.S.C. 7412), will be required to be analyzed to determine if any current, enforceable Maximum Achievable Control Technology (MACT) are applicable.

For purposes of this section, District Rule 1320(C)(16) defines a “Modification” (Modified) as any physical or operational change to a Facility or Emissions Unit(s) to replace equipment, expand capacity, revise methods of operation, or modernize processes by making any physical change, change in method of operation, addition to an existing Emissions Unit(s) and/or change in hours of operation, including but not limited to changes which results in the emission of any Hazardous Air Pollutant, Toxic Air Contaminant, or Regulated Toxic Substance or which results in the emission of any Hazardous Air Pollutant, Toxic Air Contaminant, or Regulated Toxic Substance not previously emitted.

HDPP is subject to both State and Federal Toxic New Source Review, as a Modified Facility (or Emissions Units) with the potential to emit a Toxic Air Contaminant. Pursuant to the requirements of District Rule 1320, an applicability analysis of state and federal air toxic regulations was conducted for the proposed equipment (State T-NSR and Federal T-NSR, respectively). The State T-NSR and Federal T-NSR analyses are described below.

- State T-NSR Rule 1320(B)(2): The new diesel fueled emergency generator has the potential to emit TAC/HAP and these emissions are increased because it is new equipment added to an existing facility. No Simultaneous Emission Reductions are proposed.

Pursuant to District Rule 1320, section (E)(1) requires that the district determine if the Emissions Units will be subject to any Airborne Toxic Control Measure (ATCM). The proposed engine is subject to 17 CCR 93115 ATCM for Stationary Compression Ignition Engines. Permit conditions have been included in the permit to ensure compliance with the ATCM. Section (E)(2) requires that the District calculate an Emission Unit Prioritization Score for each new emissions unit utilizing the most recently approved CAPCOA Facility Prioritization Guidelines, the most recently approved OEHHA Unit Risk Factor for cancer potency factors, and the most recently approved OEHHA Reference Exposure Levels for non-cancer acute factors, and non-cancer chronic factors. Emission Unit Prioritization Scores were prepared using the July 2016 CAPCOA Facility Prioritization Guidelines. The total Emission Unit Prioritization Scores for the proposed Emission Units based on potential to emit are as follows:

Table 2 – Emission Unit Prioritization Score

Proposed New/Modified Emission Units	Cancer Priority	Chronic/ Noncancer Priority	Acute Priority
E014847 New Diesel Emergency Generator	7.11E-03	1.05E-05	0.00E+00

As shown in the table above, the Emission Unit Prioritization Scores for the proposed new Emission Units are less than one (1) and therefore, categorized as “Low Priority.”

- Federal T-NSR Rule 1320(B)(3): Federal T-NSR is required because the proposed engine is classified as an Air Toxic Area source by USEPA. 40 CFR 63 Subpart ZZZZ is applicable and the owner/operator complies via compliance with 40 CFR 60 Subpart IIII.

b. District Rule 1520 – Control of Toxic Air Contaminants from Existing Sources:

District Rule 1520 applies to HDPP, as they are an existing facility that has a facility PTE greater than ten (10) tons per year for VOC, PM, and NOX, as well as a PTE to emit a TAC (Section (B)(1)(a) and (c)). The most recent facility Comprehensive Emission Inventory Report (CEIR) and the Potential to Emit for the post modification turbines was used to calculate a facility wide prioritization score to determine if further risk analysis is required. The facility wide prioritization scores are shown in Table 3 below:

Table 3 – Facility Prioritization Score

	Cancer Priority	Chronic/ Noncancer Priority	Acute Priority
Facility Prioritization Score	8.45	0.38	0.24

The facility prioritization score was based on the PTE for the new diesel engine plus the 2022 actual emissions for the balance of the existing permitted equipment as reported in the 2022 Comprehensive Emission Inventory (CEI). The carcinogenic Prioritization Score for the Facility is 8.45 and therefore, categorizes it as Intermediate Priority. No additional analysis nor noticing is required. This facility's actual emissions will continue to be reviewed annually pursuant to the AB 2588 Hot Spots Program as part of the District's CEI Program.

D. Rules and Regulations Applicable to the Proposed Project

District Rules

Rules 203 – Permit to Operate. Any equipment which may cause the issuance of air contaminants must obtain authorization for such construction from the Air Pollution Control Officer. HDPP is in compliance with this rule as they have appropriately applied for a District permit for all new equipment and maintains District permits for all residing equipment per Part II, section A of their FOP.

Rule 204 – Permit Conditions. To assure compliance with all applicable regulations, the Air Pollution Control Officer may impose written conditions on any permit. HDPP complies with all applicable regulations per Part II, section A of their FOP.

Rule 206 – Posting of Permit to Operate. Equipment shall not operate unless the entire permit is affixed upon the equipment or kept at a location for which it is issued and will be made available to the District upon request. HDPP complies with this regulation per Part II, section A of their FOP.

Rule 207 – Altering or Falsifying of Permit. A person shall not willfully deface, alter, forge, or falsify any issued permit. HDPP complies with this regulation per Part II, section A of their FOP.

Rule 209 – Transfer and Voiding of Permits. HDPP shall not transfer, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another. When equipment which has been granted a permit is altered, changes location, or no longer will be operated, the permit shall become void. HDPP complies with this regulation per Part II, section A of their FOP.

Rule 210 – Applications. HDPP provided all the required information to correctly address the Modification pursuant to this rule.

Rule 212 – This rule establishes baseline criteria for approving District permits for certain projects. This permitting action is solely a federal operating permit renewal and is not subject to this District Rule.

Rule 217 – Provisions for Sampling and Testing Facilities. This rule requires the applicant to provide and maintain requirements for sampling and testing. HDPP is in compliance with this rule per Part II, section A of their FOP.

Rule 219 – Equipment not Requiring a Permit. This rule exempts certain equipment from District Permit. HDPP is in compliance with this rule per Part II, section A.

Rule 221 – Federal Operating Permit Requirement. HDPP is in compliance with this rule, as they currently hold and maintain a Federal Operating Permit.

Rule 301/312 – Permit Fees/Fees for Federal Operating Permits. HDPP annual permit fees are due by the applicable dates.

Rule 401 – Visible Emissions. This rule limits visible emissions opacity to less than 20 percent (or Ringlemann No. 1). In normal operating mode, visible emissions are not expected to exceed 20 percent opacity. HDPP has specific operating conditions that enforce compliance with this rule, specifically Part II, section A.

Rule 403 – Fugitive Dust. This rule prohibits fugitive dust beyond the property line of any emission source. HDPP has specific operating conditions to ensure compliance with this condition, specifically Part II, section A.

Rule 404 – Particulate Matter Concentration. HDPP shall not discharge into the atmosphere from this facility, particulate matter (PM) except liquid sulfur compounds, in excess of the concentration at standard conditions, shown in Rule 404, Table 404 (a).

(a) Where the volume discharged is between figures listed in the table the exact concentration permitted to be discharged shall be determined by linear interpolation.

(b) This condition shall not apply to emissions resulting from the combustion of liquid or gaseous fuels in steam generators or gas turbines.

(c) For the purposes of this condition, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.

HDPP adheres to this rule per Part II, section A of their FOP

Rule 405 – Solid Particulate Matter, Weight. HDPP shall not discharge into the atmosphere from this facility, solid PM including lead and lead compounds in excess of the rate shown in Rule 405, Table 405(a):

(a) Where the process weight per hour is between figures listed in the table, the exact weight of permitted discharge shall be determined by linear interpolation.

(b) For the purposes of this condition, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.

HDPP adheres to this rule per Part II, section A of their FOP.

Rule 406 – Specific Contaminants. This rule limits single source of emissions of specific compounds. HDPP meets this requirement by complying with operating condition listed in Part II, section A of their FOP.

Rule 407 – Liquid and Gaseous Air Contaminants. This rule limits CO emissions from facilities. HDPP meets this requirement by complying with operating condition listed in Part II, section A of their FOP.

Rule 408 – Circumvention. This rule prohibits hidden or secondary rule violations. The proposed Modification and renewal as described are not expected to violate Rule 408. HDPP meets this requirement by complying with operating condition listed in Part II, section A of their FOP.

Rule 409 – Combustion Contaminants. This rule limits the emissions of combustion contaminants exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12 percent of carbon dioxide (CO₂) at standard averaged over a minimum of 15 consecutive minutes. HDPP meets this requirement by complying with operating condition listed in Part II, section A of their FOP.

Rule 430 – Breakdown Provisions. Any Breakdown which results in a violation to any rule or regulation as defined by Rule 430 shall be properly addressed pursuant to this rule. HDPP meets this requirement by complying with operating condition listed in Part II, section A of their FOP.

Rule 431 – *Sulfur Content of Fuels*. This rule limits the sulfur content allowed in fuels burned at the facility. HDPP meets this requirement by complying with operating condition listed in Part II, Section A of their FOP.

Rule 442 – Usage of Solvents. This rule reduces VOC emissions from VOC containing materials or equipment that is not subject to any other rule in Regulation XI. HDPP meets the requirement by complying with operating condition listed in Part II, section A of their FOP.

Rule 900 – *Standards of Performance for New Stationary Sources (NSPS)*. Rule 900 adopts all applicable provisions regarding standards of performance for new stationary sources as set forth in 40 CFR 60. The provisions of applicable NSPS's have been incorporated into the conditions of the District Permits for applicable units in Part III of the FOP.

Rule 1000 – *National Emission Standards for Hazardous Air Pollutants (NESHAP)*. Rule 1000 adopts all applicable provisions regarding standards of performance for new stationary sources as set forth in 40 CFR 61. The provisions of applicable NESHAPS's have been incorporated into the conditions of the District Permits for applicable units in Part III of the FOP.

Rule 1104 – *Organic Solvent Degreasing Operations*. This rule limits the emission of VOCs from wipe cleaning and degreasing operations using organic solvents. HDPP meets this requirement by complying with operating condition listed in Part II, Section A of their FOP.

Rule 1113 – *Architectural Coatings*. This rule limits the quantity of VOC in Architectural Coatings. HDPP meets the requirements of this rule by complying with operating condition listed in Part II, Section A of their FOP.

Rule 1114 – *Wood Products Coatings*. This rule limits the emission of VOC from coatings associated with Wood Products. HDPP meets the requirements of this rule by complying with operating condition listed in Part II, Section A of their FOP.

Rule 1115 – *Metal Parts and Products Coatings*. This rule limits the emission of VOC from coatings associated with Metal Parts and Products. HDPP meets the requirements of this rule by complying with operating condition listed in Part II, Section A of their FOP.

Rule 1160 – *Internal Combustion Engines*. This rule specifically exempts emergency engines therefore the rule is not applicable to the proposed new engine.

Rule 1168 - *Adhesives and Sealants*. This rule limits the emission of VOC from adhesives and sealants. The requirements are largely placed on the adhesive and sealant manufacture as the product categories regulated by this rule are largely consumer products. HDPP meets the requirements of this rule by complying with the requirements of Part II.A.

Regulation XII – *Federal Operating Permits*. This regulation contains requirements for sources which must have a FOP. HDPP currently has a FOP and is expected to comply with all applicable rules and regulations.

Rule 1201 – *Federal Operating Permit Definitions*. HDPP is defined as a federal Major Facility pursuant to this rule.

Rule 1203 – *Federal Operating Permits*. This rule outlines the permit term, issuance, restrictions, content, operational flexibility, compliance certification, permit shield, and violations of Federal Operating Permits. HDPP complies with this rule per Part II, Sections B and C, and Part IV and V of their FOP.

Rule 1205 – *Modifications of Federal Operating Permits*. The proposed equipment classifies as a Modification to the Federal Operating Permit (FOP), and subsequently, this permit modification is issued in accordance with the provisions of District Rule 1203.

Rule 1207 – *Notice and Comment*. This rule outlines the noticing requirements for Notice and Comment. HDPP will properly notice their renewal and modification pursuant to this rule.

Rule 1208 – *Certification*. HDPP included a Certification of Responsible Official as required with the submitted application for the proposed modification.

Rule 1211 – *Greenhouse Gas Provisions of Federal Operating Permits*. HDPP is a Major GHG Facility pursuant to Rule 1211. HDPP meets the requirements of this rule by complying with operating condition listed in Part II, Section A of their FOP.

Regulation XIII – *New Source Review*

Rule 1302 – *Procedure*. This rule applies to all new or Modified Facilities and requires certain requirements to be fulfilled when submitting an application. All applicable requirements of this rule are discussed in this NSR document as part of the analysis procedure. Certification of compliance with the Federal Clean Air Act, applicable implementation plans, and all applicable District rules and regulations have been addressed. The Authority to Construct (ATC) application package for the proposed equipment along with follow-on information supplied by the applicant in response to District requests includes sufficient documentation to comply with Rule 1302(D)(5)(b)(ii). Permit conditions for the proposed project will require compliance with Rule 1302(D)(5)(b)(iii).

Rule 1303 – *Requirements*. This rule requires BACT and offsets for selected facility modifications. The proposed emergency engine does trigger BACT for NO_x, VOC and PM₁₀ because the facility is a major source for those non-attainment air pollutants. The facility operates under previously offset facility wide emissions limitations for NO_x, VOC and PM₁₀ which are not increased by the proposed permitting action therefore offsets are not required.

Rule 1304 – *Emissions Calculations*. The Proposed Emissions from the proposed modifications were calculated pursuant to section (B)(1)(a) of this rule.

Rule 1320 – *New Source Review for Toxic Air Contaminants*. Pursuant to the requirements of District Rule 1302, an applicability analysis of state and federal air toxic regulations was conducted for the proposed modifications (State T-NSR and Federal T-NSR, respectively) and is discussed in further detail in section (C)(4) of this document.

Rule 1520 – *Control of Toxic Air Contaminants from Existing Sources*. This rule controls the emission of toxic air contaminants from existing source. The required analysis was performed as required by 1520(D)(1)(b). HDPP is expected to comply with the annual requirements specified in this rule by submitting their annual Comprehensive Emission Inventory report.

Regulation XVII – *Prevention of Significant Deterioration*. HDPP operates under PSD permit SE 98-01 3/10. Please take notice that this regulation is not currently used within the MDAQMD because the USEPA has not delegated authority for the PSD Program to the MDAQMD at this time. However, per the language in the applicability procedures of 40 CFR 52.21 (a)(2)(i) and (ii), PSD applies to “any new major stationary source or the major modification of any existing major stationary source”. The proposed actions do not result in a new major stationary source and do not constitute a major modification of any existing major stationary source, the proposed minor modification and Title V permit renewal are not subject to PSD. Specific requirements of the PSD permit are included in the FOP as operating conditions under the affected equipment. Please see Part III, Section A, conditions 20, 21, and 22.

State Regulations

17 CCR 93115 – *ATCM for Stationary Compression Ignition Engines*. The purpose of this airborne toxic control measure (ATCM) is to reduce diesel particulate matter (PM) and criteria pollutant emissions from stationary diesel-fueled compression ignition (CI) engines. While the

proposed emergency generator is portable and complies with the standards of 17 CCR 93116, the Portable ATCM, emissions comply with the more rigorous standards of the Stationary ATCM. To allow for operational flexibility in the event that the engine is required longer than 365 days, the provisions of the Stationary ATCM have been incorporated into the conditions of the District Permit for new diesel engine in Part III of the FOP.

Federal Regulations

40 CFR 60, Subpart A – NSPS *General Provisions* and 40 CFR part 60, subpart KKKK - *Standards of Performance for Stationary Combustion Turbines* - The requirements of 40 CFR part 60, subpart KKKK is applicable to the combustion turbines, and applicable requirements are included in the permit as operating conditions. As 40 CFR 60, Subpart KKKK applies, the turbine is exempt from 40 CFR 60, Subpart GG.

40 CFR 61, Subpart M – NESHAP for Asbestos: HDPP complies with 40 CFR 61, Subpart M – NESHAP for Asbestos per conditions in Part II, section C.

40 CFR 63 Subpart A and 40 CFR 60, Subpart III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines: HDPP complies with this rule by operating conditions listed in Part III for the new IC engine.

40 CFR 63 Subpart A and 40 CFR 63, Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines: HDPP complies with this rule by operating conditions listed in Part III for each **applicable** IC engine.

40 CFR 64, Compliance Assurance Monitoring

The Compliance Assurance Monitoring (CAM) rule (40 CFR 64) applies to each Pollutant Specific Emissions Unit (PSEU) when it is located at a Major Facility that is required to obtain Title V, Part 70 or 71 permit and it meets all of the following criteria. “PSEU” means an emissions unit considered separately with respect to each regulated air pollutant. The PSEU must:

- a. Be subject to an emission limitation or standard [40 CFR 64; AND,
- b. Use a control device to achieve compliance [40 CFR 64.2(a)(2)]; AND,
- c. Have the potential pre-control emissions that exceed or are equivalent to the major source threshold. [40 CFR 64.2(a)(3)]

The combustion turbines each have a pre-control PTE which is in excess of the major source threshold. The turbines each vent through a selective catalytic reduction control and an oxidation catalyst control. The turbine emissions are monitored by a Continuous Emissions Monitor (CEMS). 40 CFR 64.2(b)(1)(vi) specifically exempts the turbines and their associated controls from CAM because the CEMS is required in the Part 70 (Title V) permit. There is no other equipment at the facility which satisfies the criteria specified in “a”, “b”, and “c” above; therefore, none of the other facility equipment is subject to CAM either. See the CAM Plan

applicability determination, included in the renewal application materials included in Appendix A.

There are no modifications to the CAM-affected units associated with this permitting action. A full CAM analysis will be performed either at the next permit renewal or when and if the modified CAM-affected units are modified, whichever occurs first.

E. Conclusion and Recommendation

The District has reviewed the applications for the proposed modification of the HDPP Federal Operating Permit and conducted a written analysis as required by District Rule 1302, section (D)(1)(b) and District Rule 1203, section (B)(1)(a). The District has determined that the proposed modification is compliant with all applicable District, State, and Federal rules and regulations as projected when operated in the terms of the permit conditions given herein, and the attached revised FOP. The proposed permit and corresponding statement of basis will be released for public comment and publicly noticed pursuant to District Rule 1207. To view the public notice please refer to Appendix D of this document. Please refer to the cover sheet of this document for noticing and review dates.

This preliminary decision/determination will be submitted to USEPA, CARB, the facility and the public for review and comment. Please refer to the cover page of this document for the noticing and comment period timeframes.

To view the public notice please refer to Appendix A of this document or visit the MDAQMD website <https://www.mdaqmd.ca.gov/permitting/public-notices-advisories/public-notices-permitting>.

Director, Office of Air Division
United States EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105
Notified via electronic reporting to cdx.epa.gov (EPA Central Data Exchange)

Chief, Stationary Source Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812
Notified via email to permits@arb.ca.gov

Joseph Douglas, Project Manager
California Energy Commission
715 P Street
Sacramento, CA 95814
Notified via email to: CME@energy.ca.gov

Claude Cauvillion, Vice President of Operations
High Desert Power Project
19000 Perimeter Road
Victorville, CA 92394.

Appendix A Application

Mojave Desert Air Quality Management District

TITLE V – PERMIT AMENDMENT / MODIFICATION

I. PERMIT ACTION (Check appropriate box)

- ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION
 OFF-PERMIT CHANGE

1. FACILITY NAME: High Desert Power Project, LLC	
2. FACILITY ID: 01849	
3. TITLE V PERMIT NO: 104701849	
4. TYPE OF ORGANIZATION: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
5. COMPANY NAME: High Desert Power Project, LLC	
6. COMPANY MAILING/BILLING ADDRESS: STREET/P.O. BOX: 19000 Perimeter Road CITY: Victorville STATE: CA 9-DIGIT ZIP CODE: 92394	
7. FACILITY ADDRESS: STREET: 19000 Perimeter Road CITY: Victorville STATE: CA 9-DIGIT ZIP CODE: 92394	PROPOSED DATE OF INSTALLATION:
8. DISTANCES (FEET AND DIRECTION) TO CLOSEST: FENCELINE: 7800 RESIDENCE: 1500 BUSINESS: 7000 SCHOOL: _____	
9. GENERAL NATURE OF BUSINESS: Electric Power Production (NAICS 221112)	
10. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Convert a PERP Permit #185120 to a District permit. Isuzu BR-4HK1X diesel engine, 170 bhp, ~100 kW, diesel fueled, turbocharged/aftercooled, Tier 4 Final compliant EPA Engine Family: KSZXL05.2RXB	
11. PERSON TO CONTACT FOR INFORMATION ON THIS APPLICATION: NAME: Vincent Dodero PHONE NUMBER: 760-530-2326 TITLE: Compliance Manager EMAIL: _____	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and check all for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:



Signature of Responsible Official

8/11/2023

Date

Claude Couvillion

Name of Responsible Official (please print)

VP of Operations

Title of Responsible Official (please print)

For AQMD Use Only:

DATE STAMP	DISTRICT PERMIT APPLICATION NO: _____	COMPANY /FACILITY ID: _____
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APPLICATION FOR TITLE V MODIFICATION

- Instructions -

Page 1 of 4

I. PERMIT ACTION

On the application form, mark the box to indicate what type of Title V modification this is. Definitions follow in these instructions. Only one application form is needed for each facility.

- Line 1.** Enter the name of the facility.
- Line 2.** Enter the MDAQMD Facility ID number
- Line 3.** Enter the current Title V permit number
- Line 4.** Indicate the organizational structure of the facility
- Line 5.** Enter the name of the facility owner
- Line 6.** List the mailing address where correspondence regarding the application and the Permit to Operate may be sent. Please include your nine-digit zip code.
- Line 7.** Enter the facility mailing address. Indicate the installation date of any equipment changes from this modification.
- Line 8.** Indicate the distance of equipment, including feet and direction), from the closest fenceline, residence, business, and school.
- Line 9.** Indicate the general nature of the business performed by the facility.
- Line 10.** Describe each emissions unit. You may reference existing valid District Permits to Operate for each permitted emissions unit.
- Line 11.** Provide the name, title, phone number, and email address of a person to contact for further information on this application.

II. Compliance Certification

A compliance certification is a certification by the Responsible Official that each of the statements initialed in this section are true, accurate, and complete. The Responsible Official must check each box for which the statements are true, sign and date, and print his/her name and title.

For a corporation, the responsible official shall be a president, secretary, treasurer, or vice president in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation. The responsible official may be a duly authorized representative rather than any of the above if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit; and

1. the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million in 1980 dollars; or
2. the District has approved a petition from the original responsible person to delegate authority.

APPLICATION FOR TITLE V MODIFICATION

- Instructions -

Page 2 of 4

For a public agency the responsible official shall be either the principal executive officer or the ranking elected official. The principal executive officer, in the case of a federal agency, may be the executive officer having responsibility for a geographical unit.

For a partnership or sole proprietorship, the responsible official is a general partner or the proprietor, respectively.

OTHER REQUIRED INFORMATION

If needed to complete the processing of your Title V permit application, the District may request additional information.

APPLICATION FOR TITLE V MODIFICATION

- Instructions -

Page 3 of 4

Administrative Permit Amendment

An administrative amendment is a modification to a FOP that is being made solely for the purpose of accomplishing one or more of the following objectives:

1. Corrects typographical errors.
2. Makes an administrative change at the source such as the name, address, or phone number of a person named in the Part 70 permit.
3. Requires more frequent monitoring or reporting by the permittee.
4. Allows for the transfer of ownership or operational control of a stationary source provided that a written agreement containing a specific date for transfer of Part 70 permit responsibility, coverage and liability between the current and new permittee has been submitted to the District.

Minor Permit Modification

A minor permit modification is a revision to a FOP which is not an Administrative Permit Amendment and which meets all of the following criteria:

1. The proposed modification does not violate or cause a violation of any Applicable Requirement; and
2. The proposed modification does not relax any monitoring requirements or relax any reporting or record keeping requirements; and
3. The proposed modification does not require or change a federally mandated case-by-case determination of an emission limitation or other standard, a Facility specific determination of ambient impacts for temporary Facilities, or a visibility or increment analysis or require or change a case-by-case determination of an emissions limitation or other standard required or imposed pursuant to District Regulation XIII – New Source Review; and
4. The proposed modification does not impose or change a permit condition which allows the Facility, or any Permit Unit at the Facility, to operate below the threshold of applicability for any Applicable Requirement or of this regulation; and
5. The proposed modification is not a modification under Title I of the Federal Clean Air Act.

Significant Permit Modification/Title I Modification

A significant permit modification is a revision or proposed revision to a FOP which does not meet the qualifications for an Administrative Permit Amendment or a Minor Permit Modification. All Title I Modifications must be treated as Significant Permit Modification. A Title I modification is a modification to a FOP that meets any of the following criteria:

APPLICATION FOR TITLE V MODIFICATION

- Instructions -

Page 4 of 4

1. A modification under Section 111 (New Source Performance Standards (NSPS)), i.e. when a modification of an existing unit at a Title V facility is considered a modification as defined in 40 CFR Part 60.14. (This does not include new units subject to NSPS.)
2. A modification under Section 112 (Hazardous Air Pollutants (HAPS)), i.e. when either a new project or a modification of an existing emissions unit at a Title V facility would increase the potential to emit for HAPs and would constitute either the construction or reconstruction of a major source of HAPs as defined in 40 CFR part 63.41. This type of modification also occurs when a modification to an existing emissions unit occurs that would not be considered a reconstruction of a major source of HAPs, but would still increase HAP emissions beyond the HAP major levels such that federal promulgated MACT requirements for the emissions unit category would become applicable.
3. A major modification under Part C of Title I (PSD), i.e. when a new project or modification of an existing emissions unit at a Title V facility will require a PSD permit. This is a major modification under Part C of Title I of the Clean Air Act.
4. A major modification under Part D of Title I (Nonattainment Areas), i.e. when the potential to emit from all new, modified, replacement, or relocated emission units at the stationary source, which are covered by the application for such Part 70 permit modification, plus all other emission increases that occurred during the specified evaluation period are equal to or greater than 25 tons/year for ROC or 25 tons/year for NOx.

The evaluation period is a period of five consecutive calendar years consisting of the calendar year in which the application for such Part 70 permit modification is submitted to the District and the four calendar years immediately prior to the calendar year in which the application for such Part 70 permit modification is submitted to the District.

MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT

BRAD POIRIEZ, EXECUTIVE DIRECTOR

14306 Park Avenue, Victorville, CA 92392-2310

760.245.1661 • Fax 760.245.2022

Email: engineering@mdaqmd.ca.gov

www.MDAQMD.ca.gov • [@MDAQMD](https://twitter.com/MDAQMD)



Application for internal combustion engine (I.C.E.) only

Remit **\$356.00** with this document (\$203.00 for change of owner)

PLEASE TYPE OR PRINT

Section 1: Owner information

a. Permit to be issued to (company name):			b. Federal tax ID #:	
c. Mailing/billing address (for above company name) include city, state and zip code:				
d. Facility or business license name (for equipment location):				
e. Facility Address — Location of equipment (if same as for company, enter "Same"):			Equip. coordinates (lat/long):	
f. Contact name:	Title:	Email address:	Phone:	
General nature of business:			Company NAICS:	
Type of Organization <input type="checkbox"/> Individual owner <input type="checkbox"/> Partnership <input type="checkbox"/> Corporation <input type="checkbox"/> Utility <input type="checkbox"/> Local agency <input type="checkbox"/> State agency <input type="checkbox"/> Federal agency				

Section 2: Nature of application

Application is hereby made for the following equipment:	
Application is for what type of permit: <input type="checkbox"/> New construction <input type="checkbox"/> Modification <input type="checkbox"/> Change of owner	For modification or change of owner: _____ Current Permit Number
Do you claim Confidentiality of Data? <input type="checkbox"/> No <input type="checkbox"/> Yes (attach explanation; specify which information provided is confidential)	

Section 3: Equipment information

Engine function: <input type="checkbox"/> Prime <input type="checkbox"/> Emergency <small>check one</small> <input type="checkbox"/> Low-use (<80 hr/yr) <input type="checkbox"/> Portable <input type="checkbox"/> Stand-by (as defined in Rule 301[E][10]) <small>check all that apply</small>		
Engine manufacturer: _____	Engine model: _____	Engine serial number: _____
Engine year of manufacture: _____	Date installed: _____	
Rating (BHP): _____	Speed (RPM): _____	Number of cylinders: _____
Fuel type: <input type="checkbox"/> CARB diesel <input type="checkbox"/> Natural gas <input type="checkbox"/> Propane/LPG <input type="checkbox"/> Gasoline <input type="checkbox"/> Digester gas <input type="checkbox"/> Landfill gas <input type="checkbox"/> Other (specify): _____ Alternative fuel/back-up fuel, if applicable (specify): _____		
Engine meter: <input type="checkbox"/> Hour meter <input type="checkbox"/> Dedicated fuel meter <input type="checkbox"/> None		
Cycle type: <input type="checkbox"/> two cycle <input type="checkbox"/> four cycle		Combustion type: <input type="checkbox"/> Rich burn <input type="checkbox"/> Lean burn
Check all that apply: <input type="checkbox"/> Naturally aspirated <input type="checkbox"/> Turbocharged <input type="checkbox"/> Aftercooled <input type="checkbox"/> Intercooled <input type="checkbox"/> Air-to-fuel ratio controller <input type="checkbox"/> Smoke puff limiter <input type="checkbox"/> Electronic control module <input type="checkbox"/> Direct fuel injection <input type="checkbox"/> Pre-combustion chamber <input type="checkbox"/> Piston scavenging <input type="checkbox"/> Other(s) (specify): _____		
Add-on emission control technology: <input type="checkbox"/> Yes <input type="checkbox"/> No (if applicable, attach manufacturer's specifications and CARB certification or source test results)		
If yes: Manufacturer: _____ Model: _____ Serial No.: _____ CARB EO#: _____		
Type: <input type="checkbox"/> SCR <input type="checkbox"/> Non-SCR <input type="checkbox"/> Particulate trap <input type="checkbox"/> EGR <input type="checkbox"/> Oxidation catalyst <input type="checkbox"/> Other (specify): _____		
Stack data Exhaust stack height from ground: _____ feet Exhaust stack diameter: _____ feet		
Stack is: <input type="checkbox"/> horizontal <input type="checkbox"/> vertical <input type="checkbox"/> weather cap Vent data: Exhaust temp. _____ °F Maximum exhaust rate (ACFM): _____		

-For District use only-

Application number:	Invoice number:	Permit number:	Company/facility number:
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Section 4: Emissions data

Emission Factor Basis (attach any source specified): _____				
USEPA family name _____ CARB family name _____				
<input type="checkbox"/> Manufacturer <input type="checkbox"/> Source test <input type="checkbox"/> MDAQMD default <input type="checkbox"/> USEPA AP-42 <input type="checkbox"/> Other (please specify): _____				
Emissions data: _____				
Pollutant	Pre-control max. emissions	Units	Post control max. emissions	Units
NO _x	_____	_____	_____	_____
NMHC	_____	_____	_____	_____
CO	_____	_____	_____	_____
PM ₁₀	_____	_____	_____	_____
SO _x	_____	_____	_____	_____
Toxic pollutants — Please include a list of all toxic air pollutants and their emission rates if known.				

Section 5: Powered Item

This ICE is used to power: <input type="checkbox"/> Electrical generator <input type="checkbox"/> Compressor <input type="checkbox"/> Pump <input type="checkbox"/> Paint spray gun <input type="checkbox"/> Conveyor or drive <input type="checkbox"/> Fire pump <input type="checkbox"/> Other (specify): _____				
PERP registration (if applicable): _____				
Manufacturer: _____ Model: _____ Serial No.: _____ Type/size/rating: _____				

Section 6: Operation information

Fuel Consumption: _____ at max rated load <input type="checkbox"/> gal/hour <input type="checkbox"/> SCF/hour <input type="checkbox"/> MMBtu/hr				
Typical load: _____				
Facility annual operation by quarters (percent): <input type="checkbox"/> Uniform OR _____ % Jan-Mar _____ % Apr-Jun _____ % Jul-Sep _____ % Oct-Dec			Expected operating hours of equipment _____ Hrs/day _____ Days/wk _____ Wk/yr Total annual hours _____	

Section 7: Receptor information

Distance (feet) and direction to the property line of closest: _____ residence _____ business _____ school				
Name of closest school (K-12) _____				
<i>If the proposed equipment operates within 1,000 feet of a school site and operation results in the emission of hazardous air pollutants, a public notice will be required at the expense of the applicant (CH&S §42301.6)</i>				

***Please note:** District staff may contact you for further information. Failure to provide additional information as requested in a timely manner may result in delays in the processing of this permit application.

Section 8: Certification

I hereby certify that all information contained herein is true and correct.				
Name of responsible official _____		Official title _____		Signature of responsible official _____
Date signed _____				
Phone: _____		Email: _____		

Application submission instructions:

- 1) Submit completed application to Engineering@mdaqmd.ca.gov
- 2) Pay the corresponding application fee of \$356 per permit for new or modified permit (or \$203 for change of owner) via check or credit card.

Payment by check:

Make check payable to **Mojave Desert AQMD**
 Mail the check with a copy of this completed application to:
Mojave Desert AQMD
 14306 Park Avenue
 Victorville, CA 92392

Payment by credit card:

Pay online at <http://www.mdaqmd.ca.gov>
 Click "Pay Fees"
 Please note: **a surcharge applies for all credit card payments.**

- 3) If payment is made online via credit card, please email the receipt to Engineering@mdaqmd.ca.gov
 Should you have any additional questions, please, do not hesitate to contact the permitting division at 760-245-1661, or via email at engineering@mdaqmd.ca.gov

Appendix B Public Notice & Comment Received

Noticing Methods include the following, per District Rule 1207 (A)(1)(a) and District Rule 1302(D)(2)and(3):

- Published in newspapers of general circulation.
- Mailed and/or emailed to MDAQMD contact list of persons requesting notice of actions (see the contact list following the Public Notice in this Appendix.
- Posted on the MDAQMD Website at the following link:
<https://www.mdaqmd.ca.gov/permitting/public-notices-advisories/public-notices-permitting>

NOTICE OF PRELIMINARY DETERMINATION

NOTICE IS HEREBY GIVEN THAT High Desert Power Project (HDPP) located at 19000 Perimeter Road in Victorville, California has submitted applications to modify/renew their Federal Operating Permit (104701849) pursuant to the provisions of the Mojave Desert Air Quality Management District (MDAQMD) Regulations XIII and XII. The facility is designed to generate electric power. The facility is a major source for NOx, VOC, CO and PM10. The facility has applied to permit and operate a new diesel fueled emergency generator. The proposed constitutes a Modification pursuant to District Regulation XIII and a significant modification of the Title V permit because it requires a federally mandated case by-case determination of an emission limitation and because it requires a case-by-case determination of an emissions limitation or other standard required or imposed pursuant to District Regulation XIII – New Source Review.

REQUEST FOR COMMENTS Interested persons are invited to submit written comments and/or other documents regarding the terms and conditions of the proposed modification of High Desert Power Project’s Federal Operating Permit. If you submit written comments, you may also request a public hearing on the proposed renewal of the Federal Operating Permit. To be considered, comments, documents and requests for public hearing must be submitted no later than 5:00 P.M. on December 14, 2023 to the MDAQMD, Attention: Roseana Brasington, Air Quality Engineer at the address listed below.

PETITION FOR REVIEW: Federal Operating Permits are also subject to review and approval by the United States Environmental Protection Agency (USEPA). If EPA has not objected to the proposed title V permit during its 45-day review period, the public may petition EPA to object to the proposed Title V permit within 60 days of expiration of EPA’s review period. Any such petition must be based on objections that were raised with reasonable specificity during the public comment period unless the petitioner demonstrates either that it was impracticable to raise such objections within the comment period or that the grounds for the objection arose after the comment period. The petitioner shall provide a copy of such petition to the permitting authority and the permittee. EPA’s website contains more information on petitions, including instructions for submitting a petition and the required content of petitions: <https://www.epa.gov/title-v-operating-permits/title-v-petitions>.

AVAILABILITY OF DOCUMENTS:

The proposed Federal Operating Permit, as well as the application and other supporting documentation are available for review at the MDAQMD offices, 14306 Park Avenue, Victorville, Ca 92392. In addition, these documents are available on the MDAQMD website and can be viewed at following link: <https://www.mdaqmd.ca.gov/permitting/public-notices-advisories/public-notices-permitting>. Please contact Roseana Navarro-Brasington, Air Quality Engineer at the address, above, or (760) 245-1661, extension 5706, or at rnbrasington@mdaqmd.ca.gov for additional questions pertaining to this action and/or corresponding documents.

Traducción en español esta disponible por solicitud. Por favor llame: (760) 245-1661

Preliminary Determination/Decision - Statement of Basis
High Desert Power Project
November 13, 2023
B-4

SHERI HAGGARD
Permit Engineering Manager
Mojave Desert Air Quality Management District
14306 Park Avenue
Victorville, CA

Appendix C Risk Analysis

- Project Prioritization Scores

HARP Facility Prioritization Report

BASED ON PTE FOR NEW ENGINE + APPROVED 2022 CEIR

Reporting Year: 2
 Project Path: C:\HARP2\HARP2\CEI\2018CEIRNB
 Project Database: C:\HARP2\HARP2\CEI\2018CEIRNB\2019CEIRNB.mdb
 CEIDARS Utility Database: C:\HARP2\Tables\CEIDARSTables042023.mdb
 HARP Health Talbe: HEALTH202304
 Sorting Order: DIS, AB, CO, TS, FACID, DEV, POLABBREV
 Date Created: 10/12/2023 2:33:38 PM
 Operator:

*****HARP EIM Version: 2.1.6*****

POLLUTANT HEALTH VALUES FROM HARP HEALTH DATABASE:

POLLUTANT ID	POLLUTANT	CANCERURF (INH)	ACUTEREL ug/m^3	CHRONICREL (INH) ug/m^3
106990	1,3-Butadiene	1.70E-04	6.60E+02	2.00E+00
75070	Acetaldehyde	2.70E-06	4.70E+02	1.40E+02
107028	Acrolein	N/A	2.50E+00	3.50E-01
7440360	Antimony	N/A	N/A	N/A
7440382	Arsenic	3.30E-03	2.00E-01	1.50E-02
71432	Benzene	2.90E-05	2.70E+01	3.00E+00
7440417	Beryllium	2.40E-03	N/A	7.00E-03
7440439	Cadmium	4.20E-03	N/A	2.00E-02
67663	Chloroform	5.30E-06	1.50E+02	3.00E+02
42101	CO	N/A	N/A	N/A
7440508	Copper	N/A	1.00E+02	N/A
18540299	Cr(VI)	1.50E-01	N/A	2.00E-01
9901	DieselExhPM	3.00E-04	N/A	5.00E+00
100414	Ethyl Benzene	2.50E-06	N/A	2.00E+03
50000	Formaldehyde	6.00E-06	5.50E+01	9.00E+00
1095433)^-1	Hexane	N/A	N/A	7.00E+03
7439921	Lead	1.20E-05	N/A	N/A
7439965	Manganese	N/A	N/A	9.00E-02
7439976	Mercury	N/A	6.00E-01	3.00E-02
91203	Naphthalene	3.40E-05	N/A	9.00E+00
7664417	NH3	N/A	3.20E+03	2.00E+02
7440020	Nickel	2.60E-04	2.00E-01	1.40E-02
42603	NOX	N/A	N/A	N/A
1151	PAHs-w/o	1.10E-03	N/A	N/A
85101	PM10	N/A	N/A	N/A
85101	PM10	N/A	N/A	N/A
85101	PM10	N/A	N/A	N/A
88101	PM25	N/A	N/A	N/A
75569	Propylene Oxide	3.70E-06	3.10E+03	3.00E+01
7782492	Selenium	N/A	N/A	2.00E+01
42401	SOX	N/A	N/A	N/A
108883	Toluene	N/A	5.00E+03	4.20E+02

43104 VOC N/A N/A N/A
 1330207 Xylenes N/A 2.20E+04 7.00E+02

PRIORITIZATION SCORE SUMMARY:

Facility Name
 Proximity Method
 Optional Factors

FACID	CO AB	DIS DEVICE	Emission and Potency Procedure				Dispersion Adjustment Procedure				Highest Score
			Cancer	Acute	Chronic	NonCancer	Cancer	Acute	Chronic	NonCancer	

HDEP PERMITTING SCREEN NEW PERP EICE
 Proximity Method:

		MOJ	8.45	0.24	0.38	0.47	8.01	0.21	0.34	0.42	8.45
Annual Operating Hours	1	1.07	8.47E-02	9.73E-02	0.13	0.93	7.39E-02	8.49E-02	0.11		
1849 36 MD	2	1.08	7.50E-02	0.11	0.14	0.94	6.55E-02	9.51E-02	0.12		
	3	1.10	8.17E-02	0.12	0.15	0.96	7.13E-02	0.10	0.13		
	4	3.45	0.00E+00	5.11E-03	5.11E-03	3.44	0.00E+00	5.11E-03	5.11E-03		
	5	0.11	0.00E+00	1.63E-04	1.63E-04	0.11	0.00E+00	1.63E-04	1.63E-04		
	6	1.63	1.73E-03	5.40E-02	5.43E-02	1.63	1.73E-03	5.40E-02	5.43E-02		
Device ID	7	7.11E-03	0.00E+00	1.05E-05	1.05E-05	7.10E-03	0.00E+00	1.05E-05	1.05E-05		
Device ID	18	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00		
Device ID	19	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00		

 Device ID
 Device ID
 Device ID

PRIORITIZATION SCORES AND POLLUTANTS: (For proximity method or optional factors information, please see section above.)
 Device_ID-----

Note: 1. Annual Emissions units: LBS/YR for toxics, TONS/YR for criteria pollutants, CURIES/YR for radionuclides.
 Hourly Maximum Emissions units: LBS/HR for toxics, MILLICURIES/HR for radionuclides.
 * GHGs, non-regulatory pollutants, and user defined pollutants are marked by an asterisk with the pollutant ID.

2.
 Facility Name
 FACID CO AB DIS DEVICE Emission and Potency Procedure Dispersion Adjustment Procedure Highest Score
 Cancer Acute Chronic NonCancer Cancer Acute Chronic NonCancer

These pollutants were not included in the prioritization score calculation.

		MOJ	8.45	0.24	0.38	0.47	8.01	0.21	0.34	0.42	8.45
Annual Operating Hours:	8760										
1849 36 MD	1	1.07	8.47E-02	9.73E-02	0.13	0.93	7.39E-02	8.49E-02	0.11		

Device ID	POL ID	POLLUTANT	ANNUAL EMS		HR MAX EMS	
			EMS	HR	EMS	HR
			0.855		1.592E-04	
			88.253		1.643E-02	
		Acrolein	16.523		3.075E-03	
		Benzene	204.110		3.799E-02	
		CO	17.800		N/A	
			51.125		9.515E-03	
			194.390		3.665E-02	
		Hexane	503.470		9.371E-02	
			2.721		5.065E-04	

	4	3.45	0.00E+00	5.11E-03	5.11E-03	3.44	0.00E+00	5.11E-03	5.11E-03
		POL ID	POLLUTANT	ANNUAL EMS	HR MAX EMS				
			CO	3.348E-02	N/A				
				135.648	0.342				
Device ID			NOX	1.170	N/A				
			PM10	6.782E-02	N/A				
			SOX	7.776E-04	N/A				
			VOC	0.170	N/A				
	5	0.11	0.00E+00	1.63E-04	1.63E-04	0.11	0.00E+00	1.63E-04	1.63E-04
Pollutant		POL ID	POLLUTANT	ANNUAL EMS	HR MAX EMS				
			CO	4.434E-02	N/A				
				4.320	1.440E-04				
			NOX	3.600E-02	N/A				
Device ID			PM10	2.080E-03	N/A				
			SOX	2.470E-05	N/A				
			VOC	5.213E-03	N/A				
42101	6	1.63	1.73E-03	5.40E-02	5.43E-02	1.63	1.73E-03	5.40E-02	5.43E-02
Pollutant		POL ID	POLLUTANT	ANNUAL EMS	HR MAX EMS				
9901 DieselExhP			Antimony	0.135	1.436E-05				
42803			Arsenic	4.502E-02	4.791E-06				
85101			Beryllium	2.256E-02	2.401E-06				
42401			Cadmium	2.256E-02	2.401E-06				
43104				2.440	2.597E-04				
Device ID			Copper	14.683	1.563E-03				
			Cr(VI)	0.126	1.344E-05				
42101			Lead	0.112	1.195E-05				
Pollutant			Manganese	24.292	2.585E-03				
9901 DieselExhP			Mercury	2.256E-02	2.401E-06				
42803			Nickel	0.112	1.195E-05				
85101			PM10	2.159	N/A				
42401			PM2.5	2.159	N/A				
43104			Selenium	0.112	1.195E-05				
	7	7.11E-03	0.00E+00	1.05E-05	1.05E-05	7.10E-03	0.00E+00	1.05E-05	1.05E-05
7440360		POL ID	POLLUTANT	ANNUAL EMS	HR MAX EMS				
7440382				0.280	1.000E-02				
7440417									
7440439									
Device ID	18	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
7440360		POL ID	POLLUTANT	ANNUAL EMS	HR MAX EMS				
18540299			PM10	3.870E-03	N/A				
7439921									
7439965									
7439976	19	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Device ID		POL ID	POLLUTANT	ANNUAL EMS	HR MAX EMS				
85101			PM10	3.870E-03	N/A				
8880492									
Device ID									
Pollutant									
9901 DieselExhP									
Pollutant									

