

STATIONARY SOURCE SUMMARY

(FORM 900-A1)

DISTRICT: **IMPERIAL COUNTY**

COMPANY NAME: **Imperial Irrigation District**

▶ DISTRICT USE ONLY ◀

District ID: _____

Application #: _____

Application Received: _____

Application Filing Fee: _____

Application Deemed Complete: _____

I. FACILITY IDENTIFICATION

1. Facility Name: **Rockwood Gas Turbine Plant**
2. Four digit SIC Code: **4911** EPA Plant ID: _____
3. Parent Company (if different than Facility Name): **Imperial Irrigation District**
4. Mailing Address: **333 East Barioni Blvd. Imperial, CA 92251**
5. Street Address or Source Location: **4195 Dogwood Road, Brawley, CA 92227**
6. UTM Coordinates (if required): _____
7. Source located within:
50 miles of the state line Yes No
50 miles of a Native American Nation Not Applicable Yes No
8. Type of Organization: Corporation Sole Ownership Government Partnership Utility Company
9. Legal Owner's Name: **Imperial Irrigation District**
10. Owner's Agent Name (if any): _____
11. Responsible Official: **Kraig Strauch**
12. Plant Site Manager/Contact: **Jack Shelnutt** Telephone #: **(760) 427-7447**
13. Type of facility: **Power Plant**
14. General description of processes/products: **Power Generation**
15. Does your facility store, or otherwise handle, greater than threshold quantities of any substance on the Section 112(r) List of Substances and their Thresholds (see attachment A)? Yes No
16. Is a Federal Risk Management Plan [pursuant to Section 112(r)] required? Not Applicable Yes No
(If yes, attach verification that Risk Management Plan is registered with appropriate agency or description of status of Risk Management Plan submittal.)

STATIONARY SOURCE SUMMARY (FORM 900-A2)

DISTRICT: <div style="text-align: center; font-weight: bold; color: blue;">IMPERIAL COUNTY</div>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <div style="text-align: center; font-weight: bold; color: blue;">Imperial Irrigation District</div>	FACILITY NAME: <div style="text-align: center; font-weight: bold; color: blue;">Rockwood Gas Turbine Plant</div>

II. TYPE OF PERMIT ACTION

	CURRENT PERMIT <small>(permit number)</small>	EXPIRATION <small>(date)</small>
<input type="checkbox"/> Initial Title V Application		
<input checked="" type="checkbox"/> Permit Renewal	V-1365	November 22, 2022
<input type="checkbox"/> Significant Permit Modification		
<input checked="" type="checkbox"/> Minor Permit Modification		
<input type="checkbox"/> Administrative Amendment		

III. DESCRIPTION OF PERMIT ACTION

1. Does the permit action requested involve: a: Portable Source Voluntary Emissions Caps
 Acid Rain Source Alternative Operating Scenarios
 Source Subject to MACT Requirements [Section 112]
- b: None of the options in 1.a. are applicable
2. Is source operating under Compliance Schedule? Yes No

3. For permit modifications, provide a general description of the proposed permit modification: _____

Propose change to Sections V. A. 1 & V.B.1 : change "12 month period" to "annually".

ICAPCD Rule 400.1.G.5, "Source test shall be submitted to the APCO within 60 days following the actual source test date." Request to change Section VII.4 to reflect this rule.

TOTAL STATIONARY SOURCE EMISSIONS

(FORM 900-B)

DISTRICT: <p style="text-align: center; margin: 0;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; margin: 0;">Imperial Irrigation District</p>	FACILITY NAME: <p style="text-align: center; margin: 0;">Rockwood Gas Turbine Plant</p>

I. TOTAL STATIONARY SOURCE EMISSIONS

Provide a brief description of operating scenario : All permitted units operate at their annual permitted emissions limits using only primary fuels.

POLLUTANT* (name)	EMISSIONS (tons per year)	PRE-MODIFICATION EMISSIONS (tons per year)	EMISSIONS CHANGE (tons per year)
NOx	56.00	N/A	N/A
SO2	4.88	N/A	N/A
PM	1.08	N/A	N/A
CO	9.32	N/A	N/A
VOC	0.702	N/A	N/A
Formaldehyde	5.95E-02	N/A	N/A
Benzene	3.83E-03	N/A	N/A
PAH	2.38E-03	N/A	N/A

* Emissions for all pollutants that the source is major for and all regulated air pollutants must be reported. See Attachment A.

COMBUSTION EMISSION UNIT (FORM 900-C1)

DISTRICT: <p style="text-align: center; font-weight: bold; color: blue;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; font-weight: bold; color: blue;">Imperial Irrigation District</p>	FACILITY NAME: <p style="text-align: center; font-weight: bold; color: blue;">Rockwood Gas Turbine Plant</p>

I. PERMIT NUMBER: V-1365 (V-1386A Unit 2)

II. EMISSION UNIT DESCRIPTION

1. Equipment type: Gas Turbine
2. Equipment description: Dual-fuel (Natural Gas, No. 2 Diesel), peaking turbine, Unit 1
3. Equipment make, model & serial number: Pratt & Whitney, FT4C 3F(DF), SN P686777
4. Maximum design process rate or maximum power input/output: Net Power Output: 22MW
5. Primary use: Electric power production
6. Burner(s) design, operating temperature and capacity: NG: 308.6 MMBtu/hr; No. 2 Diesel: 280.5 MMBtu/hr
7. Control device(s) type and description (if any): Water Injection system for NOx control

III. OPERATIONAL INFORMATION

1. Operating schedule: 24 (hours/day) 400 (hours/year)
2. Exhaust gas properties (temperature, SCFM, %H₂O, %O₂ or %CO₂, % excess air): _____

Exhaust Temp: 900-1100 F

3. Fuel specifications:

FUEL TYPE (name)	ANNUAL USAGE (c.f./yr, lb/yr, gal/yr)	HEATING VALUE (BTU/lb or BTU/gal)	SULFUR (%)	NITROGEN (%)
Natural Gas	121 mscf/yr	22,800 Btu/lb	0.0024 wt%	2.0 wt%
No. 2 Diesel	811,192 gal/yr	138,315 Btu/gal	0.0190 wt%	

COMBUSTION EMISSION UNIT (FORM 900-C2)

DISTRICT: <p style="text-align: center; margin: 0;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; margin: 0;">Imperial Irrigation District</p>	FACILITY NAME: <p style="text-align: center; margin: 0;">Rockwood Gas Turbine Plant</p>

4. Unit emissions:

CRITERIA POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS	NOx	SO ₂	PM	CO	VOC
A. Emissions	28.00	2.04	0.41	5.06	6.79E-01
B. Pre-Modification Emissions¹					
C. Emission Change²					
D. Emission Limit³					
OTHER REGULATED AIR POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS	Formaldehyde	Benzene	PAH		
A. Emissions	4.38E-02	7.41E-04	1.36E-04		
B. Pre-Modification Emissions¹					
C. Emission Change²					
D. Emission Limit³					
¹ For permit modifications only, emissions prior to project modification. ² Difference between Pre-Modification Emissions (Section B.) and Emissions (Section A.). ³ For voluntary emissions cap and emission limits [i.e. expressed as parts per million (ppm) corrected for dilution air, pounds per hour (lbs/hr), pounds per million BTU (lb/MMBTU, etc.] required by any applicable federal requirement.					

COMBUSTION EMISSION UNIT (FORM 900-C1)

DISTRICT: <p style="text-align: center; font-weight: bold; color: blue;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; font-weight: bold; color: blue;">Imperial Irrigation District</p>	FACILITY NAME: <p style="text-align: center; font-weight: bold; color: blue;">Rockwood Gas Turbine Plant</p>

I. PERMIT NUMBER: V-1365 (V-1386A Unit 2)

II. EMISSION UNIT DESCRIPTION

1. Equipment type: Gas Turbine
2. Equipment description: Diesel fuel, peaking turbine, Unit 2
3. Equipment make, model & serial number: Pratt & Whitney, FT4C 3F(LF), SN P686764
4. Maximum design process rate or maximum power input/output: Net Power Output: 22MW
5. Primary use: Electric Power Production
6. Burner(s) design, operating temperature and capacity: 280.5 MMBtu/hr
7. Control device(s) type and description (if any): Water Injection system for NOx control

III. OPERATIONAL INFORMATION

1. Operating schedule: 24 (hours/day) 400 (hours/year)
2. Exhaust gas properties (temperature, SCFM, %H₂O, %O₂ or %CO₂, % excess air): _____

Exhaust Temp: 900-1100 F

3. Fuel specifications:

FUEL TYPE (name)	ANNUAL USAGE (c.f./yr, lb/yr, gal/yr)	HEATING VALUE (BTU/lb or BTU/gal)	SULFUR (%)	NITROGEN (%)
No. 2 Diesel	811,192 gal/yr	138,315 Btu/gal	0.0190wt%	

COMBUSTION EMISSION UNIT (FORM 900-C2)

DISTRICT: <p style="text-align: center; margin: 0;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; margin: 0;">Imperial Irrigation District</p>	FACILITY NAME: <p style="text-align: center; margin: 0;">Rockwood Gas Turbine Plant</p>

4. Unit emissions:

CRITERIA POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS	NO _x	SO ₂	PM	CO	VOC
A. Emissions	28.00	2.83	0.67	4.26	2.30E-02
B. Pre-Modification Emissions ¹					
C. Emission Change ²					
D. Emission Limit ³					
OTHER REGULATED AIR POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS	Formaldehyde	Benzene	PAH		
A. Emissions	1.57E-02	3.09E-03	2.24E-03		
B. Pre-Modification Emissions ¹					
C. Emission Change ²					
D. Emission Limit ³					
¹ For permit modifications only; emissions prior to project modification. ² Difference between Pre-Modification Emissions (Section B.) and Emissions (Section A.). ³ For voluntary emissions cap and emission limits [i.e. expressed as parts per million (ppm) corrected for dilution air, pounds per hour (lbs/hr), pounds per million BTU (lb/MMBTU, etc.) required by any applicable federal requirement.					

EXEMPT EQUIPMENT (FORM 900-H)

DISTRICT: <b style="color: blue;">IMPERIAL COUNTY	<p style="text-align: center;">▷ DISTRICT USE ONLY ◀</p> DISTRICT ID:
COMPANY NAME:	FACILITY NAME:

I. EQUIPMENT EXEMPT FROM DISTRICT PERMIT REQUIREMENTS

EXEMPT EQUIPMENT	EQUIPMENT DESCRIPTION	BASIS FOR EXEMPTION
Diesel Day Tank	62,207 gallon tank	202 E.8.c

COMPLIANCE PLAN (FORM 900-I1)

DISTRICT: <p style="text-align: center; font-weight: bold;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME:	FACILITY NAME:

I. PROCEDURE FOR USING FORM XXX-I

This form shall be submitted as part of the Title V Application. The Responsible Official shall identify the applicable federal requirement(s) to which the source is subject. In the Compliance Plan (Form XXX-I), a Responsible Official shall identify whether the source identified in the Title V Application currently operates in compliance with all applicable federal requirements.

II. APPLICABLE FEDERAL REQUIREMENTS

APPLICABLE FEDERAL REQUIREMENT	EMISSION UNIT or PERMIT NUMBER	IN COMPLIANCE (yes/no/exempt ¹)	EFFECTIVE DATE ²
Rule 101, Definitions	Facility Wide	Yes	10/10/06
Rule 110, Stack Monitoring	Units 1 & 2	Yes	09/14/99
Rule 201, Permits Required	Facility Wide	Yes	10/10/06
Rule 207, Standards for Permit to Construct	Facility Wide	Yes	Prior to 03/17/80
Rule 400.1, Stationary Gas Turbines(s) - (RACT)	Units 1 & 2	Yes	02/23/10
Rule 401, Opacity of Emissions	Facility Wide	Yes	11/19/85
Rule 403, General Limitations on the...	Units 1 & 2	Yes	05/18/04
Rule 405, Sulfur Compounds Emission Standards	Units 1 & 2	Yes	05/18/04
40 CFR Part 60, Subpart GG, Standards of...	Units 1 & 2	Yes	
40 CFR Part 64, Compliance Assurance...	Units 1 & 2	Yes	
Permit to Operate No. 1365A	Unit 1	Yes	
Permit to Operate No. 1386A	Unit 2	Yes	
Rule 900 - Operating Permits	Facility Wide	Yes	10/20/11

¹ If exempt from applicable federal requirement, attach explanation for exemption.
² Indicate the date during the permit term that the applicable federal requirement will become effective.

COMPLIANCE PLAN (FORM 900-I2)

DISTRICT: <p style="text-align: center; font-size: 1.2em;">IMPERIAL COUNTY</p>	▷ DISTRICT USE ONLY ◁ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; font-size: 1.1em;">Imperial Irrigation District</p>	FACILITY NAME: <p style="text-align: center; font-size: 1.1em;">Rockwood Gas Turbine Plant</p>

III. COMPLIANCE CERTIFICATION

Under penalty of perjury, I certify the following:

- Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s) with which the source is in compliance identified in form XXX-I1;***
- Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with the future-effective applicable federal requirement(s) identified in form XXX-I1, on a timely basis¹ ;***
- Based on information and belief formed after reasonable inquiry, the source identified in this application is not in compliance with the applicable federal requirement(s), identified in form XXX-I1, and I have attached a compliance plan schedule.²***

Signature of Responsible Official	4-14-22 Date
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1. Unless a more detailed schedule is expressly required by the applicable federal requirement.
2. At the time of expected permit issuance, if the source expects to be out of compliance with an applicable federal requirement, the applicant is required to provide a compliance schedule with this application, with the following exception. A source which is operating under a variance that is effective for less than 90 days need not submit a Compliance Schedule. For sources operating under a variance, which is in effect for more than 90 days, the Compliance Schedule is the schedule that was approved as part of the variance granted by the hearing board.

The compliance schedule shall contain a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with this applicable federal requirement. For sources operating under a variance, the compliance schedule is part of the variance granted by the hearing board. The compliance schedule shall resemble, and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject. For sources not operating under a variance, consult the Air Pollution Control Officer regarding procedures for obtaining a compliance schedule.

COMPLIANCE PLAN CERTIFICATION (FORM 900-J1)

DISTRICT: IMPERIAL COUNTY	▷ DISTRICT USE ONLY ◁ DISTRICT ID:
COMPANY NAME: Imperial Irrigation District	FACILITY NAME: Rockwood Gas Turbine Plant

I. CERTIFICATION STATUS

1. Indicate the dates the applicant intends to submit the **COMPLIANCE CERTIFICATION REPORT** to the district during the entire permit term. The district federal operating permits rule requires the applicant to submit this report at least annually.

February 28th of each year.

2. For sources required to have a schedule of compliance to remedy a violation, indicate the dates the applicant intends to submit **CERTIFIED PROGRESS REPORTS** to the district during the permit term. The district federal operating permits rule requires the applicant to submit this report at least semiannually.

3. Describe the compliance status of the source with respect to applicable enhanced monitoring, and compliance certification requirements of Section 114(a)(3) of the Clean Air Act:

COMPLIANCE PLAN CERTIFICATION

(FORM 900-J2)

DISTRICT: <p style="text-align: center; font-weight: bold; color: blue;">IMPERIAL COUNTY</p>	▷ DISTRICT USE ONLY ◁ DISTRICT ID:
COMPANY NAME: <p style="color: blue;">Imperial Irrigation District</p>	FACILITY NAME: <p style="color: blue;">Rockwood Gas Turbine Plant</p>

II. CERTIFICATION INFORMATION

EMISSION UNIT or	V-1365	APPLICABLE	_____
PERMIT NUMBER:	V-1386A	FEDERAL	_____
		REQUIREMENT:	_____

METHOD	DESCRIPTION OR REFERENCE METHOD
Monitoring	Part of Title V permit.
Reporting	Part of Title V permit.
Record Keeping	Part of Title V permit.
Test Methods	Part of Title V permit.

EMISSION UNIT or		APPLICABLE	_____
PERMIT NUMBER:		FEDERAL	_____
		REQUIREMENT:	_____

METHOD	DESCRIPTION OR REFERENCE METHOD
Monitoring	
Reporting	
Record Keeping	
Test Methods	

CERTIFICATION STATEMENT (FORM 900-M)

DISTRICT: <p style="text-align: center; font-size: 1.2em;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; font-size: 1.2em;">Imperial Irrigation District</p>	FACILITY NAME: <p style="text-align: center; font-size: 1.2em;">Rockwood Gas Turbine Plant</p>

Identify, by checking off below, the forms and attachments that are part of your application. If the application contains forms or attachments that are not identified below, please identify these attachments in the blank space provided below. Review the instructions if you are unsure of the forms and attachments that need to be included in a complete application.

Forms included with application

- Stationary Source Summary Form
- Total Stationary Source Emission Form
- Compliance Plan Form
- Compliance Plan Certification Form
- Exempt Equipment Form
- Certification Statement Form

List other forms or attachments

1. Cover Letter

2. Rule 400.1

3. Check for \$1302.50 (ICAPCD Rule 301 B.2)

Attachments included with application

- Description of Operating Scenarios
- Sample emission calculations
- Fugitive emission estimates
- List of Applicable requirements
- Discussion of units out of units of compliance with applicable federal requirements and, if required, submit a schedule of Compliance
- Facility schematic showing emission points
- NSR Permit
- PSD Permit

I certify under penalty of law, based on information and belief formed after reasonable inquiry, that the information contained in this application, composed of the forms and attachments identified above, are true, accurate, and complete.

I certify that I am the responsible official, as defined in (title of district Title V permitting rule).

4-14-22

Signature of Responsible Official

Date

Kraig Strauch

Print Name of Responsible Official

Manager of Generation, Imperial Irrigation District

Title of Responsible Official and Company Name

List Other Forms or Attachments (cont.)
