



## RESUBMITTAL OF 2020 REASONABLY AVAILABLE CONTROL TECHNOLOGY (RACT) DEMONSTRATION WITH ADDENDUM

The San Diego County Air Pollution Control District (SDAPCD) formally re-submits the 2020 Reasonably Available Control Technology (RACT) Demonstration<sup>1</sup> for the 2008 and 2015 National Ambient Air Quality Standards (NAAQS) for Ozone in San Diego County with this addendum.

### Reason for Re-Submittal with Addendum

San Diego County's State Implementation Plan (SIP) for the 2008 and 2015 Ozone NAAQS included 1) the 2020 Attainment Plan<sup>2</sup> and 2) RACT Demonstration, which were submitted to the U.S. Environmental Protection Agency (EPA) on January 8, 2021,<sup>3</sup> and December 28, 2020,<sup>4</sup> respectively. EPA formally approved the 2020 Attainment Plan effective April 1, 2024.<sup>5</sup> EPA did not take action on the RACT Demonstration for approximately three and a half years after receipt. The federal Clean Air Act requires the EPA Administrator to determine whether the submission is sufficient to meet minimum criteria established by the Administrator for such proposals within 60 days of the receipt of a proposed SIP or SIP revision. If the Administrator fails to make a "completeness" finding, which occurred in the case of the 2020 RACT Demonstration, the proposed SIP or SIP revision is deemed complete by operation of law six months after submission. For the purposes of the 2020 RACT Demonstration, the SIP revision was deemed complete by operation of law on June 28, 2021, however, no further action on the submission had been taken. To comply with a consent decree,<sup>6</sup> stemming from a lawsuit filed against EPA by the Center for Biological Diversity (CBD), EPA was required to act on (approve/disapprove) the RACT Demonstration by October 31, 2024.

On May 31, 2024, the EPA informed the SDAPCD about their consent decree requirement to act upon the 2020 RACT Demonstration no later than October 31, 2024. At that time, EPA informed SDAPCD of specific concerns with the 2020 RACT Demonstration, primarily in relation to existing exemptions for Startup, Shutdown, and Malfunction (SSM) emissions found in SDAPCD Rule 69.3.1 (Stationary Gas Turbine Engines) and Rule 69.4.1 (Stationary Reciprocating Internal Combustion Engines). EPA also indicated that some SDAPCD rules lacked "periodic reporting" requirements from permitted facilities of their records, that EPA may require to be submitted to SDAPCD in response to litigation. EPA had not been able to provide clear guidance on what actions the SDAPCD would need to take to adequately rectify the concerns noted with "periodic reporting" for the 2020 RACT Demonstration to be approvable. Because of EPA's lack of guidance and evolving criteria for RACT evaluation, SDAPCD would have been unable to

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<sup>1</sup> [https://www.sdapcd.org/content/dam/sdapcd/documents/grants/planning/Att%20B%20\(RACT\).pdf](https://www.sdapcd.org/content/dam/sdapcd/documents/grants/planning/Att%20B%20(RACT).pdf)

<sup>2</sup> [https://www.sdapcd.org/content/dam/sdapcd/documents/grants/planning/Att%20A%20\(Attainment%20Plan\)\\_ws.pdf](https://www.sdapcd.org/content/dam/sdapcd/documents/grants/planning/Att%20A%20(Attainment%20Plan)_ws.pdf)

<sup>3</sup> <https://www.sdapcd.org/content/dam/sdapcd/documents/grants/planning/Letter%20to%20US%20EPA%20-%20RW%20signed%201.8.20.pdf>

<sup>4</sup> <https://www.sdapcd.org/content/dam/sdapcd/documents/grants/planning/Letter%20to%20EPA%20-%20SDAPCD%20RACT%20SIP%20-%20RW%20signed%2012.28.20.pdf>

<sup>5</sup> 89 FR 15035

<sup>6</sup> *Center for Biological Diversity et al., v. Regan*, No. 3:22-cv-03309-RS (N.D. Cal.)

complete the necessary rule development actions to satisfy EPA's concerns within the required 18-month time frame in advance of the sanction clock deadline that would have been initiated through a disapproval action by EPA. SDAPCD contends had EPA evaluated and acted upon the 2020 RACT demonstration in a timely manner after submittal, the RACT demonstration would have met most, if not all, the requirements necessary for approval at that time.

Left with no other option and after consultation with California Air Resources Board (CARB) and EPA Region 9 staff, SDAPCD formally requested withdrawal of the 2020 RACT Demonstration on August 23, 2024. The withdrawal request encompassed all elements of the 2020 RACT Demonstration, with the exception of the negative declaration associated with EPA's Control Techniques Guidelines (CTG) for the Oil and Natural Gas Industry (EPA-453/B-16-001, 2016/10). EPA formally issued a "Finding of Failure to Submit" a required RACT Demonstration for the 2008 and 2015 Ozone NAAQS on December 12, 2024 (effective January 13, 2025), as necessary to comply with the aforementioned Consent Decree.<sup>7</sup> This action compelled SDAPCD to submit, subject to an affirmative determination of completeness by the EPA, a RACT Demonstration within 18 months from the effective date of the Finding of Failure to Submit (i.e., July 13, 2026). If the EPA has not affirmatively determined that SDAPCD (through CARB) has submitted a complete RACT SIP, pursuant to Clean Air Act Sections 179(a) and (b), an emissions offset sanction identified in Clean Air Act Section 179(b)(2) will apply to San Diego County. If the EPA has not affirmatively determined that SDAPCD (through CARB) has submitted a complete RACT SIP within six months after the offset sanction is imposed, a highway funding sanction will also apply to San Diego County.

Upon approval by the SDAPCD Governing Board, this Addendum, combined with the previously submitted RACT Demonstration, is being submitted to EPA (through CARB) to comply with the associated submittal deadline. The following are actions the SDAPCD has taken since the submittal of the 2020 RACT Demonstration, to adequately address the previously noted concerns and to comply with the "Finding of Failure to Submit" finding from EPA:

- 1) Amendment of Rule 69.3.1 (Stationary Gas Turbine Engines) and Rule 69.4.1 (Stationary Reciprocating Internal Combustion Engines) to reflect current EPA policy in regard to Startup, Shutdown, and Malfunctions (SSM)

Prior to these amendments, Rules 69.3.1 and 69.4.1 provided time-limited exemptions from emission standards during startup and shutdown of stationary gas turbines and engines. The air pollution control systems on these combustion sources are effective only at specific temperatures or under specific conditions and are generally infeasible during non-standard operating modes. Still, startup and shutdown conditions are evaluated by SDAPCD staff during the initial permitting process to ensure compliance with all applicable rules, including new source review and air toxics regulations. Permit conditions including operational limitations on sources are established and enforced by the SDAPCD to ensure all modes of operation (including startup and shutdown) will not threaten air quality standards or pose unacceptable health risks in neighboring and downwind communities.

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<sup>7</sup> 89 FR 100377

In 2024, EPA informed SDAPCD staff that the prior startup/shutdown exemptions in existing Rules 69.3.1 and 69.4.1 were not consistent with the Clean Air Act (CAA), which requires emission limitations to apply on a continuous basis. Because the prior emission standards in these rules do not apply during startup and shutdown periods, they could not be considered continuous and the prior rules could not be approved by EPA as fully meeting CAA requirements, absent an alternative emission limitation that applies during such periods. However, the CAA allows alternative emission limitations that include numerical limitations, specific technological control requirements, and/or work practice requirements for limiting emissions during startup and shutdown as part of a continuously applicable emission limitation.

Accordingly, in consultation with EPA, SDAPCD has prepared proposed amendments to Rules 69.3.1 and 69.4.1 which establishes work practice requirements to limit emissions during periods of startup and shutdown of affected sources. The rule amendments require the frequency and duration of operation in startup or shutdown mode and the resulting emissions to be minimized to the greatest extent practicable. These amendments will be proposed for adoption by the SDAPCD Governing Board on February 12, 2026, and will be effective upon adoption.

## 2) Rule 69.2 Industrial and Commercial Boilers, Process Heaters and Steam Generators

The analysis included within the 2020 RACT Demonstration (section 2.2.4 on page 34) in regard to whether SDAPCD Rule 69.2 (Industrial and Commercial Boilers, Process Heaters, and Steam Generators), as approved into the SIP on February 9, 1996, continues to represent RACT for the 2008 and 2015 eight-hour ozone standards, remains applicable and relevant.

To append to that analysis for clarity, based on consultation with EPA in November 2025, the SDAPCD affirms that Rule 69.2 is consistent with current federal SSM policy and has continuous emission limits. Rule 69.2 does not contain any explicit startup/shutdown exemptions. Rule 69.2, Section (g)(2), is also consistent with requirements found in federal NESHAP Subpart A, Section 60.8(c), in regard to Performance (Source) testing. Additionally, during periods of interruption in combustion, the subject boiler is not burning gas, and would therefore not be producing any emissions, and the corresponding emission limits would not be exceeded.

## 3) Rule 68 Fuel-Burning Equipment – Oxides of Nitrogen

The analysis below supersedes the analysis included in the 2020 RACT Demonstration (Section 2.2.1 on page 32).

SDAPCD Rule 68 (Fuel-Burning Equipment – Oxides of Nitrogen) regulates NO<sub>x</sub> emissions from all non-vehicular fuel-burning equipment with rated heat input capacities of 50 million British Thermal Units per hour (BTU/hour) or more. Rule 68 was approved into the SIP on April 9, 1996.<sup>8</sup> The 2020 RACT Demonstration previously determined there was subject fuel-burning equipment at major NO<sub>x</sub> sources, and thus was applicable to the RACT requirements of CAA §182(f).

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<sup>8</sup> 61 FR 15719

However, additional review of existing permits that were previously thought to be subject to Rule 68, now indicates no major source facilities are subject to the rule. SDAPCD reviewed existing active permits that reference Rule 68 which are shown in Table 1.

*Table 1 - Facilities and Active Permits*

Site No.	Site ID (Title V)	Site Name	Permit ID	Facility/Equipment Type	Equipment Description
1	APCD1996-SITE-09779	City of SD Environmental Services Dept (Miramar Landfill)	APCD2007-PTO-950804	[48C] Waste Disposal Site/ Landfill	(2) LFG flares at West Miramar LF (Phase I & 2), & North Miramar.
2	APCD2001-SITE-04089	CalPeak Power Enterprise LLC	APCD2008-PTO-976019	[20F] Non- Aircraft Turbine Engine	(2) gas turbines (49.5 MW), simple cycle, twin-pac.
3	APCD2001-SITE-04087	SDG&E Cuyamaca Peak Energy Plant	APCD2008-PTO-976021	[20F] Non- Aircraft Turbine Engine	(2) gas turbines (49.5 MW), simple cycle, swift-pac.
4	APCD2000-SITE-03752	Chula Vista Energy Center LLC	APCD2008-PTO-976039	[20F] Non- Aircraft Turbine Engine	(2) gas turbines (44 MW), simple cycle, twin pack
5	APCD2001-SITE-04211	CalPeak Power Border LLC	APCD2008-PTO-976502	[20F] Non- Aircraft Turbine Engine	(2) gas turbines (49.5 MW), simple cycle, twin-pac.
6	APCD2001-SITE-04109	Larkspur Energy Facility	APCD2009-PTO-976094 & APCD2009-PTO-976138	[20F] Non- Aircraft Turbine Engine	(2) gas turbines (45 MW), sprint simple cycle, separate.

SDAPCD determined that other SDAPCD rules, which now will encompass SSM requirements, render revisions to Rule 68 duplicative and unnecessary. Permits listed in Table 1 were revised and updated with appropriate permit conditions and now remove references to Rule 68, as noted below. Thus, this change results in zero major source facilities being subject to Rule 68.

- Non- Aircraft Turbine Engines
  - Five (5) active permits at power generating facilities noted in Table 1 were revised to remove Rule 68 references which were outdated, and were concurrently updated to include permit conditions referencing Rule 69.3.1 instead of Rule 68. Proposed amended Rule 69.3.1 includes SSM requirements, therefore all such permits will be subject to the SSM requirements.
  - Consequently, amendments to Rule 68 to address SSM requirements that are applicable to non-aircraft turbine engines permits at these major source facilities would be duplicative and unnecessary.

- Waste Disposal Sites/Landfills
  - One (1) active permit at Miramar Landfill, specifically containing conditions related to landfill gas flares, was revised to remove Rule 68 references and updated to include permit conditions referencing new SDAPCD [Rule 69.7 - Landfill Gas Flares](#) (adopted and effective March 9, 2023). Rule 69.7 is specific to landfill gas flares that are major stationary sources of NOx.
  - Consequently, amendments to Rule 68 to address SSM requirements that are applicable to landfill gas flares permits at these major source facilities would be duplicative and unnecessary.

Since no major source facilities are currently subject to Rule 68, and because no CTG exists for the source category, the SDAPCD, in consultation with CARB and EPA, determines that Rule 68 is no longer subject to RACT requirements. Though the rule is no longer applicable to RACT, the SDAPCD will retain Rule 68 in the SIP to continue progress towards attainment of the 2008 and 2015 eight-hour ozone standards.

#### 4) Rule 67.5 (Paper, Film and Fabric Coating Operations)

The analysis below supersedes the analysis included in the 2020 RACT Demonstration (Section 2.1.15 on page 19).

SDAPCD Rule 67.5 regulates volatile organic compound (VOC) emissions from paper, film and fabric coating operations. The EPA approved Rule 67.5 into the SIP on March 27, 1997<sup>9</sup>. Because the applicable CTG (EPA-453/R-07-003, September 2007) was issued, RACT was evaluated by comparing Rule 67.5 to the CTG, in addition to South Coast Air Quality Management District (SCAQMD) Rule 1128 (Paper, Fabric, and Film Coating Operations, March 8, 1996) and San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 4607 (Graphic Arts and Paper, Film, Foil, and Fabric Coatings, December 18, 2008). The control efficiency requirements in Rule 67.5 (at least 90% overall) are as stringent as the recommendations in the CTG, which states that its recommendations for control efficiency are based on the SDAPCD's rule. The 90% control efficiency requirement is also found in SCAQMD Rule 1128 and SJVAPCD Rule 4607. As stated in the CTG, control efficiency beyond 90% is not recommended since it is not considered reasonable or feasible to install and operate a permanent total enclosure in conjunction with a control device that reduces emissions by 95%. Therefore, any control efficiencies installed at facilities in San Diego County beyond 90% control efficiency are considered to exceed RACT. Three facilities are currently subject to Rule 67.5, and each complies with the CTG limits and emit VOC amounts well under the CTG applicability threshold. Existing Rule 67.5 remains as stringent as comparable SCAQMD and SJVAPCD rules and the CTG requirement for control efficiency. Thus, Rule 67.5, as approved into the SIP on March 27, 1997, continues to represent RACT for the 2008 and 2015 eight-hour ozone standard.

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<sup>9</sup> 62 FR 14639

5) Other amendments to the previously submitted 2020 RACT Demonstration

**ATTACHMENT A – Source Categories, CTG/ACT List, and Applicable District Rules, page A-2, is revised to the following:**

For Source category “Cans and Coils, Surface Coating of,” the “Applicability” column was updated from “for cans” to “for cans and coils.”

Source Category	CTG/ACT	Reference Document	Applicability	SDAPCD Rule	SIP Approval Date, Citation	Date Last Revised	Comments
<b>Cans and Coils, Surface Coating of</b>	CTG	Control of Volatile Organic Emissions from Existing Stationary Sources - Volume II: Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles, and Light-Duty Trucks (EPA-450/2-77-008, 1977/05)	For cans and coils, applies to sheet basecoat and over varnish, two-piece can exterior basecoat and over varnish, two and three-piece can interior body spray, two-piece can exterior end spray or roll coat, three-piece can side seam spray, and end sealing compound.	67.4 - Metal Container, Metal Closure and Metal Coil Coating Operations	9/20/2012, 77 FR 58313	11/9/2011	Previously Approved Rule Reaffirmed as RACT
<b>Graphic Arts</b>	CTG	Control of Volatile Organic Emissions from Existing Stationary Sources, Volume VIII: Graphic Arts - Rotogravure and Flexography (EPA-450/2-78-033, 1978/12)	Applies to graphic arts operations that use the flexographic and rotogravure printing processes as applied to both publication and packaging printing.	67.16 – Graphic Arts Operations	9/20/2012, 77 FR 58313	11/9/2011	Previously Approved Rule Reaffirmed as RACT
<b>Graphic Arts</b>	CTG	Control Techniques Guidelines for Flexible Packaging Printing (EPA-453/R-06-003, 2006/09)	Applies to flexible packaging printing operations that emit at least 6.8 kg/day (15 lb/day) of VOC before consideration of controls.	67.16 – Graphic Arts Operations	9/20/2012, 77 FR 58313	11/9/2011	Previously Approved Rule Reaffirmed as RACT

**ATTACHMENT A – Source Categories, CTG/ACT List, and Applicable District Rules, page A-24, is revised to the following:**

The “Date Last Revised” column in the second row for Stationary Gas Turbines has been updated from “3/23/2021” to “2/12/2026.”

Source Category	CTG/ACT	Reference Document	Applicability	SDAPCD Rule	SIP Approval Date, Citation	Date Last Revised	Comments
<b>Stationary Gas Turbines</b>	ACT	NOx Emissions from Stationary Combustion Turbines (EPA-453/R-93-007, 1993/01)	Applies to stationary gas turbines used in various applications and operations.	69.3 - Stationary Gas Turbines Engines - Reasonable available Control Technology	6/17/1997, 62 FR 32691	12/16/1998	Previously Approved Rule. To be Repealed upon EPA SIP approval of proposed amended Rule 69.3.1
				69.3.1 - Stationary Gas Turbines Engines - Best Available Retrofit Control Technology	Pending	Proposed for amendment by 2/12/2026	Proposed Amended Rule Being Submitted upon adoption
<b>Stationary Reciprocating Internal Combustion (IC) Engines</b>	ACT	NOx Emissions from Stationary IC Engines (EPA-453/R-93-032, 1993/07, updated September 2000)	Applies to stationary reciprocating internal combustion engines.	69.4 - Stationary Reciprocating Internal Combustion Engines - RACT	1/04/2006, 71 FR 244	7/30/2003	Previously Approved Rule Reaffirmed as RACT. To be Repealed upon EPA SIP approval of amended Rule 69.4.1

**ATTACHMENT A – Source Categories, CTG/ACT List, and Applicable District Rules, page A-25, is revised to the following:**

The “Date Last Revised” column for Stationary Reciprocating Internal Combustion Engines (IC) has been updated from “11/15/2000 7/8/2020” to “Proposed for amendment by 2/12/2026.”

Source Category	CTG/ACT	Reference Document	Applicability	SDAPCD Rule	SIP Approval Date, Citation	Date Last Revised	Comments
<b>Stationary Reciprocating Internal Combustion (IC) Engines (cont.)</b>				69.4.1 - Stationary Reciprocating Internal Combustion Engines	NA Pending	Proposed for amendment by 2/12/2026	Proposed Amended Rule Being Submitted upon adoption
<b>OTHER</b>							
<b>Cutback Asphalt</b>	CTG	Control of VOC from Use of Cutback Asphalt (EPA-450/2-77-037, 1977/12)	Applies to use of cutback asphalt used for roadway paving.	67.7 - Cutback and Emulsified Asphalts	3/27/1997, 62 FR 14639	5/15/1996	Previously Approved Rule Reaffirmed as RACT
<b>Ethylene Oxide - Sterilization and Aeration</b>	ACT	Ethylene Oxide Sterilization/Fumigation Operations (EPA-450/3-89-007, 1989/03)	Applies to ethylene oxide used as a sterilant/fumigant in production of medical equipment supplies, in miscellaneous sterilization and fumigation operations, and at hospitals.	1203 - Ethylene Oxide Sterilizers and Aerators	N/A	N/A	No Major Sources



**ATTACHMENT B – CTG/ACT Categories with No Subject District Sources (“Negative Declaration”), page B-3, is revised to the following:**

The “Fabric, Surface Coating of” row has been removed from the table as there are no longer any major source facilities subject to Rule 67.5.

Source Category	CTG/ACT	Reference Document	Applicability	SDAPCD Sources?	RACT Analysis	Submitting ND for 2016 RACT SIP ( <i>Moderate</i> )?	Submitting ND for 2020 RACT SIP ( <i>Severe</i> )?
Fiberglass Boat Manufacturing Materials	CTG	Control Techniques Guidelines for Fiberglass Boat Manufacturing Materials (EPA-453/R-08-004, 2008/09)	Applies to the use of gel coats, resins, and materials used to clean application equipment in fiberglass boat manufacturing operations.	Yes	No sources in District with emissions exceeding CTG applicability threshold.	Yes	Yes

**ATTACHMENT B – CTG/ACT Categories with No Subject District Sources (“Negative Declaration”), page B-7 is revised to the following:**

The “Paper, Film, and Foil Coatings” row has been removed from the table as there are no longer any major source facilities subject to Rule 67.5.

Source Category	CTG/ACT	Reference Document	Applicability	SDAPCD Sources?	RACT Analysis	Submitting ND for 2016 RACT SIP ( <i>Moderate</i> )?	Submitting ND for 2020 RACT SIP ( <i>Severe</i> )?
Miscellaneous Metal and Plastic Parts Coatings	CTG Tables 3, 4, 5, and 6	Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings (EPA-453/R-08-003, 2008/09)	Applies to industries that are not covered by specific CTG documents where the total actual VOC emissions from coating operations involving plastic parts, automotive/transportation and business machine plastic parts, pleasure craft surface coating operations, and/or motor vehicle materials(including cleaning activities) are at least 6.8 kg/day (15 lbs/day) of VOC before consideration of controls.	Yes	No sources applicable to Tables 3, 4, 5, and 6 with emissions greater than the CTG applicability threshold of 15 lbs of VOC per day.	Yes	Yes

**Attachment C – Non-CTG RACT Rules for Major Stationary Sources, page C-1, is also revised to the following:**

The “SIP Submittal/Approval Status” column has been updated to remove Rule 68 and for Rules 69.3.1 and 69.4.1 to reflect recent Rules updates.

APCD Rule Number	APCD Rule Name	SIP Submittal / Approval Status
67.10	Kelp Processing and Bio-Polymer Manufacturing Operations	Approved 06/22/1998, 63 FR 33854. Unique source that is no longer a major source of VOC.
67.19	Coatings and Printing Inks Manufacturing Operations	Approved 05/26/2000, 65 FR 34101
69	Electrical Generating Steam Boilers, Replacement Units and New Units	Not being submitted. All sources are not applicable to the rule as of 1/1/2019
69.2	Industrial and Commercial Boilers, Process Heaters and Steam Generators	Approved 02/09/1996, 61 FR 4887
69.2.1	Small Boilers, Process Heaters, and Steam Generators	Amended 7/8/2020 and being submitted
69.2.2	Medium Boilers, Process Heaters, and Steam Generators	Adopted 9/9/21, Approved 8/23/23, 88 FR 57361
69.3	Stationary Gas Turbine Engines – Reasonably Available Control Technology	Approved 06/17/1997, 62 FR 32691. To be Repealed upon EPA approval of proposed amended Rule 69.3.1
69.3.1	Stationary Gas Turbine Engines	Adopted 12/9/21, Pending Approval. Proposed amendment on 2/12/2026 being submitted upon adoption to supersede previous SIP submittal.
69.4	Stationary Reciprocating Internal Combustion Engines – Reasonably Available Control Technology	Approved 01/04/2006, 71 FR 244. To be repealed upon EPA SIP approval of amended Rule 69.4.1
69.4.1	Stationary Reciprocating Internal Combustion Engines	Adopted 7/8/20, Pending Approval. Proposed amendment on 2/12/2026 being submitted upon adoption to supersede previous SIP submittal.
69.7	Landfill Gas Flares	Adopted 3/9/23, Pending EPA Approval

## ATTACHMENT D – Major Sources in San Diego County Subject to District Rules

### ATTACHMENT D – Major Sources in San Diego County Subject to District Rules, page D-1, is also revised to the following:

The row for the facility Hydranautics (APCD Source ID # 0651) has been removed from the table as new facility information is available. Hydranautics has emitted less than 9.6 tons/year of VOC since 2018, demonstrating a pattern of operational consistency and therefore not subject to RACT review. There are now also no major sources subject to Rule 67.5.

District VOC data for all facilities has also been updated to Year 2024.

APCD Source ID #	Facility Name	Facility Desc. (if applicable)	VOC (2018 CARB)	VOC (2024 District)	Rules Evaluated that Apply to San Diego County Major Source Facilities								
					59	59.1	61	61.1	61.2	61.3	61.3.1	61.4	61.4.1
19	<i>NASSCO / General Dynamics</i>	<i>Shipbuilder</i>	105.6	119.9	-	-	-	-	-	-	-	-	-
91	<i>Sfpp Lp / Sante Fe Pacific Pipeline</i>	<i>Fuel Terminal</i>	57.7	67.72	-	-	-	X	X	-	-	-	-
94	<i>USN North Island (minus TSE)</i>	<i>Military</i>	36.4	45.73	-	-	X	X	X	X	X	X	X
3680	<i>SD City/ Pt. Loma Trmt. Plant</i>	<i>Wastewater</i>	29	35.95	-	-	-	-	-	-	-	-	-
4845	<i>USN Naval Station (minus TSE)</i>	<i>Military</i>	25.5	27.02	-	-	X	-	-	X	X	X	X
6068	Toro Energy of California	Power Generation	1.7	23.42	-	-	-	-	-	-	-	-	-
4824	USMC Air Stat-Miramar	Military	23.7	18.78	-	-	X	X	X	X	X	X	X
673	California Products	Signs	16.4	16.4	-	-	-	-	-	-	-	-	-
1795	Solar Turbines-Ruffin Rd	Turbine Mfr.	15.9	16.1	-	-	-	-	-	-	-	-	-
221	USMC Camp Pendleton	Military	41.5	13.21	-	-	-	-	-	-	-	-	-
118	CP Kelco	Kelp Processing	12.9	11.95	-	-	-	-	-	-	-	-	-
96655	COSTCO Wholesale	Gas Station	14.5	7.006	-	-	X	-	-	X	X	X	X
98102	COSTCO Wholesale	Gas Station	13.9	6.23	-	-	X	-	-	X	X	X	X
97026	COSTCO Wholesale	Gas Station	13.4	5.173	-	-	X	-	-	X	X	X	X
97360	COSTCO Wholesale	Gas Station	12.7	4.895	-	-	X	-	-	X	X	X	X
9541	COSTCO Wholesale	Gas Station	13.6	4.4	-	-	-	X	-	X	X	X	X
6656	CA ST of Dept. of Corrections	Detention Facility	13.9	1.535	-	-	X	-	X	X	X	X	X
99	Rohr Industries. (Goodrich)	Aviation Parts	14.2	0.6447	-	-	-	-	-	-	-	-	-
935	Frazee Paint	Paint	20.8	0.06331	-	-	-	-	-	-	-	-	-
73	Cabrillo Pwr1-Encina	Power Generation	19	0.02707	-	-	-	-	-	-	-	-	-

#### NOTES:

-**Bold and Italic** denotes a source which has been evaluated and determined to conclusively be a major source (25 tons per year or more), based on CARB and/or recent District data. **Grey** denotes a large source that demonstrated actual emissions within 50% (12.5 tons) of being a major source, based either on 2018 CARB Facility Search Data or 2024 District data.

-Four landfills in CARB's 2018 emission inventory report VOC emissions over 12.5 tons per year. These include "SD City of Miramar" (Source ID #88196), "Sycamore Landfill Inc" (Source ID #8719), "Otay Landfill Inc." (Source ID #7263), and "SD Cnty/ San Marcos II Landfill" (Source ID #8717). However, the CARB data includes fugitive landfill emissions, which are not included in the federal determination of a major source. Non-fugitive emissions from each of these four facilities is less than two tons of VOC per year. Thus, these four facilities have not been included in Attachment D as a major source of VOC.

## ATTACHMENT D – Major Sources in San Diego County Subject to District Rules

### Attachment D – Major Sources in San Diego County Subject to District Rules, page D-2, is also revised to the following:

The row for the facility Hydranautics (APCD Source ID # 0651) has been removed from the table as new facility information is available. Hydranautics has emitted less than 9.6 tons/year of VOC since 2018, demonstrating a pattern of operational consistency and therefore not subject to RACT review. There are now also no major sources subject to Rule 67.5.

District VOC data for all facilities has also been updated to Year 2024.

APCD Source ID #	Facility Name	Facility Desc. (if applicable)	VOC (2018 CARB)	VOC (2024 District)	Rules Evaluated that Apply to San Diego County Major Source Facilities								
					61.5	61.6	61.7	61.8	64	66.1	67.0.1	67.1	67.2
<b>19</b>	<b><i>NASSCO / General Dynamics</i></b>	<b><i>Shipbuilder</i></b>	<b>105.6</b>	<b>119.9</b>	-	-	-	-	-	-	X	-	-
<b>91</b>	<b><i>Sfp Lp / Sante Fe Pacific Pipeline</i></b>	<b><i>Fuel Terminal</i></b>	<b>57.7</b>	<b>67.72</b>	-	-	X	X	-	-	X	-	-
<b>94</b>	<b><i>USN North Island (minus TSE)</i></b>	<b><i>Military</i></b>	<b>36.4</b>	<b>45.73</b>	-	-	X	X	-	-	-	-	-
<b>3680</b>	<b><i>SD City/ Pt. Loma Trmt. Plant</i></b>	<b><i>Wastewater</i></b>	<b>29</b>	<b>35.95</b>	-	-	-	-	-	-	X	-	-
<b>4845</b>	<b><i>USN Naval Station (minus TSE)</i></b>	<b><i>Military</i></b>	<b>25.5</b>	<b>27.02</b>	-	-	X	X	-	-	-	-	-
6068	Toro Energy of California	Power Generation	1.7	23.42	-	-	-	-	-	-	-	-	-
4824	USMC Air Stat-Miramar	Military	23.7	18.78	-	-	-	X	-	-	-	-	-
673	California Products	Signs	16.4	16.4	-	-	-	-	-	-	-	-	-
1795	Solar Turbines-Ruffin Rd	Turbine Mfr.	15.9	16.1	-	-	-	-	-	-	X	-	-
221	USMC Camp Pendleton	Military	41.5	13.21	-	-	-	-	-	-	-	-	-
118	CP Kelco	Kelp Processing	12.9	11.95	-	-	-	-	-	-	-	-	-
96655	COSTCO Wholesale	Gas Station	14.5	7.006	-	-	-	X	-	-	-	-	-
98102	COSTCO Wholesale	Gas Station	13.9	6.23	-	-	-	X	-	-	-	-	-
97026	COSTCO Wholesale	Gas Station	13.4	5.173	-	-	-	X	-	-	-	-	-
97360	COSTCO Wholesale	Gas Station	12.7	4.895	-	-	-	X	-	-	-	-	-
9541	COSTCO Wholesale	Gas Station	13.6	4.4	-	-	-	X	-	-	-	-	-
6656	CA ST of Dept. of Corrections	Detention Facility	13.9	1.535	-	-	-	X	-	-	-	-	-
99	Rohr Industries. (Goodrich)	Aviation Parts	14.2	0.6447	-	-	-	-	-	-	-	-	-
935	Frazee Paint	Paint	20.8	0.06331	-	-	-	-	-	-	-	-	-
73	Cabrillo Pwr1-Encina	Power Generation	19	0.02707	-	-	-	-	-	-	-	-	-

### NOTES:

**-Bold and Italic** denotes a source which has been evaluated and determined to conclusively be a major source (25 tons per year or more), based on CARB and/or recent District data. **Grey** denotes a large source that demonstrated actual emissions within 50% (12.5 tons) of being a major source, based either on 2018 CARB Facility Search Data or 2024 District data.

-Four landfills in CARB's 2018 emission inventory report VOC emissions over 12.5 tons per year. These include "SD City of Miramar" (Source ID #88196), "Sycamore Landfill Inc" (Source ID #8719), "Otay Landfill Inc." (Source ID #7263), and "SD Cnty/ San Marcos II Landfill" (Source ID #8717). However, the CARB data includes fugitive landfill emissions, which are not included in the federal determination of a major source. Non-fugitive emissions from each of these four facilities is less than two tons of VOC per year. Thus, these four facilities have not been included in Attachment D as a major source of VOC.

## ATTACHMENT D – Major Sources in San Diego County Subject to District Rules

### Attachment D – Major Sources in San Diego County Subject to District Rules, page D-3, is also revised to the following:

The row for the facility Hydranautics (APCD Source ID # 0651) has been removed from the table as new facility information is available. Hydranautics has emitted less than 9.6 tons/year of VOC since 2018, demonstrating a pattern of operational consistency and therefore not subject to RACT review. There are now also no major sources subject to Rule 67.5.

District VOC data for all facilities has also been updated to Year 2024.

APCD Source ID #	Facility Name	Facility Desc. (if applicable)	VOC (2018 CARB)	VOC (2024 District)	Rules Evaluated that Apply to									
					San Diego County Major Source Facilities									
					67.3	67.4	67.5	67.6	67.6.1	67.6.2	67.7	67.9	67.10	
<b>19</b>	<b>NASSCO / General Dynamics</b>	<b>Shipbuilder</b>	<b>105.6</b>	<b>119.9</b>	<b>X</b>	-	-	-	-	-	-	-	-	-
<b>91</b>	<b>Sfpp Lp / Sante Fe Pacific Pipeline</b>	<b>Fuel Terminal</b>	<b>57.7</b>	<b>67.72</b>	-	-	-	-	-	-	-	-	-	-
<b>94</b>	<b>USN North Island (minus TSE)</b>	<b>Military</b>	<b>36.4</b>	<b>45.73</b>	-	-	-	-	<b>X</b>	-	-	<b>X</b>	-	-
<b>3680</b>	<b>SD City/ Pt. Loma Trmt. Plant</b>	<b>Wastewater</b>	<b>29</b>	<b>35.95</b>	-	-	-	-	-	-	-	-	-	-
<b>4845</b>	<b>USN Naval Station (minus TSE)</b>	<b>Military</b>	<b>25.5</b>	<b>27.02</b>	<b>X</b>	-	-	-	-	-	-	-	-	-
6068	Toro Energy of California	Power Generation	1.7	23.42	-	-	-	-	-	-	-	-	-	-
4824	USMC Air Stat-Miramar	Military	23.7	18.78	X	-	-	-	-	-	-	X	-	-
673	California Products	Signs	16.4	16.4	X	-	-	-	-	-	-	-	-	-
1795	Solar Turbines-Ruffin Rd	Turbine Mfr.	15.9	16.1	X	-	-	-	-	-	-	-	-	-
221	USMC Camp Pendleton	Military	41.5	13.21	<b>X</b>	-	-	-	-	-	-	-	-	-
118	CP Kelco	Kelp Processing	12.9	11.95	-	-	-	-	-	-	-	-	-	X
96655	COSTCO Wholesale	Gas Station	14.5	7.006	-	-	-	-	-	-	-	-	-	-
98102	COSTCO Wholesale	Gas Station	13.9	6.23	-	-	-	-	-	-	-	-	-	-
97026	COSTCO Wholesale	Gas Station	13.4	5.173	-	-	-	-	-	-	-	-	-	-
97360	COSTCO Wholesale	Gas Station	12.7	4.895	-	-	-	-	-	-	-	-	-	-
9541	COSTCO Wholesale	Gas Station	13.6	4.4	-	-	-	-	-	-	-	-	-	-
6656	CA ST of Dept. of Corrections	Detention Facility	13.9	1.535	X	-	-	-	X	-	-	-	-	-
99	Rohr Industries. (Goodrich)	Aviation Parts	14.2	0.6447	X	-	-	-	X	-	-	X	-	-
935	Frazee Paint	Paint	20.8	0.06331	-	-	-	-	-	-	-	-	-	-
73	Cabrillo Pwr1-Encina	Power Generation	19	0.02707	X	-	-	-	-	-	-	-	-	-

#### NOTES:

**-Bold and Italic** denotes a source which has been evaluated and determined to conclusively be a major source (25 tons per year or more), based on CARB and/or recent District data. **Grey** denotes a large source that demonstrated actual emissions within 50% (12.5 tons) of being a major source, based either on 2018 CARB Facility Search Data or 2024 District data.

-Four landfills in CARB's 2018 emission inventory report VOC emissions over 12.5 tons per year. These include "SD City of Miramar" (Source ID #88196), "Sycamore Landfill Inc" (Source ID #8719), "Otay Landfill Inc." (Source ID #7263), and "SD Cnty/ San Marcos II Landfill" (Source ID #8717). However, the CARB data includes fugitive landfill emissions, which are not included in the federal determination of a major source. Non-fugitive emissions from each of these four facilities is less than two tons of VOC per year. Thus, these four facilities have not been included in Attachment D as a major source of VOC.

## ATTACHMENT D – Major Sources in San Diego County Subject to District Rules

### Attachment D – Major Sources in San Diego County Subject to District Rules, page D-4, is also revised to the following:

The row for the facility Hydranautics (APCD Source ID # 0651) has been removed from the table as new facility information is available. Hydranautics has emitted less than 9.6 tons/year of VOC since 2018, demonstrating a pattern of operational consistency and therefore not subject to RACT review.

There are now also no major sources subject to Rule 67.5.

District VOC data for all facilities has also been updated to Year 2024.

APCD Source ID #	Facility Name	Facility Desc. (if applicable)	VOC (2018 CARB)	VOC (2024 District)	Rules Evaluated that Apply to								
					San Diego County Major Source Facilities								
					67.11	67.12.1	67.15	67.16	67.17	67.18	67.19	67.20.1	67.21
<b>19</b>	<b>NASSCO / General Dynamics</b>	<b>Shipbuilder</b>	<b>105.6</b>	<b>119.9</b>	<b>X</b>	<b>X</b>	-	-	<b>X</b>	<b>X</b>	-	-	<b>X</b>
<b>91</b>	<b>Sfpp Lp / Sante Fe Pacific Pipeline</b>	<b>Fuel Terminal</b>	<b>57.7</b>	<b>67.72</b>	-	-	-	-	<b>X</b>	-	-	-	-
<b>94</b>	<b>USN North Island (minus TSE)</b>	<b>Military</b>	<b>36.4</b>	<b>45.73</b>	<b>X</b>	-	-	-	<b>X</b>	<b>X</b>	-	<b>X</b>	-
<b>3680</b>	<b>SD City/ Pt. Loma Trmt. Plant</b>	<b>Wastewater</b>	<b>29</b>	<b>35.95</b>	-	-	-	-	<b>X</b>	-	-	-	-
<b>4845</b>	<b>USN Naval Station (minus TSE)</b>	<b>Military</b>	<b>25.5</b>	<b>27.02</b>	-	-	-	-	<b>X</b>	<b>X</b>	-	-	-
6068	Toro Energy of California	Power Generation	1.7	23.42	-	-	-	-	<b>X</b>	-	-	-	-
4824	USMC Air Stat-Miramar	Military	23.7	18.78	-	-	-	-	<b>X</b>	-	-	-	-
673	California Products	Signs	16.4	16.4	-	-	-	-	<b>X</b>	-	-	-	-
1795	Solar Turbines-Ruffin Rd	Turbine Mfr.	15.9	16.1	-	-	-	-	-	-	-	-	-
221	USMC Camp Pendleton	Military	41.5	13.21	-	-	-	-	<b>X</b>	-	-	<b>X</b>	-
118	CP Kelco	Kelp Processing	12.9	11.95	-	-	-	-	-	-	-	-	-
96655	COSTCO Wholesale	Gas Station	14.5	7.006	-	-	-	-	-	-	-	-	-
98102	COSTCO Wholesale	Gas Station	13.9	6.23	-	-	-	-	-	-	-	-	-
97026	COSTCO Wholesale	Gas Station	13.4	5.173	-	-	-	-	-	-	-	-	-
97360	COSTCO Wholesale	Gas Station	12.7	4.895	-	-	-	-	-	-	-	-	-
9541	COSTCO Wholesale	Gas Station	13.6	4.4	-	-	-	-	-	-	-	-	-
6656	CA ST of Dept. of Corrections	Detention Facility	13.9	1.535	-	-	-	-	<b>X</b>	-	-	<b>X</b>	-
99	Rohr Industries. (Goodrich)	Aviation Parts	14.2	0.6447	-	-	-	-	<b>X</b>	<b>X</b>	-	-	-
935	Frazee Paint	Paint	20.8	0.06331	-	-	-	-	<b>X</b>	-	<b>X</b>	-	-
73	Cabrillo Pwr1-Encina	Power Generation	19	0.02707	-	-	-	-	<b>X</b>	<b>X</b>	-	-	-

#### NOTES:

-**Bold and Italic** denotes a source which has been evaluated and determined to conclusively be a major source (25 tons per year or more), based on CARB and/or recent District data. **Grey** denotes a large source that demonstrated actual emissions within 50% (12.5 tons) of being a major source, based either on 2018 CARB Facility Search Data or 2024 District data.

-Four landfills in CARB's 2018 emission inventory report VOC emissions over 12.5 tons per year. These include "SD City of Miramar" (Source ID #88196), "Sycamore Landfill Inc" (Source ID #8719), "Otay Landfill Inc." (Source ID #7263), and "SD Cnty/ San Marcos II Landfill" (Source ID #8717). However, the CARB data includes fugitive landfill emissions, which are not included in the federal determination of a major source. Non-fugitive emissions from each of these four facilities is less than two tons of VOC per year. Thus, these four facilities have not been included in Attachment D as a major source of VOC.

## ATTACHMENT D – Major Sources in San Diego County Subject to District Rules

### Attachment D – Major Sources in San Diego County Subject to District Rules, page D-5, is also revised to the following:

The row for the facility Hydranautics (APCD Source ID # 0651) has been removed from the table as new facility information is available. Hydranautics has emitted less than 9.6 tons/year of VOC since 2018, demonstrating a pattern of operational consistency and therefore not subject to RACT review. There are now also no major sources subject to Rule 67.5.

The column for “67.25 (Proposed)” has also been removed since there are no longer plans to adopt that Rule.

Rule 68 is also no longer applicable to “CabrilloPwr1-Encina” facility (APCD Source ID# 0073) and therefore the “X” has been removed.

District VOC data for all facilities has also been updated to Year 2024.

APCD Source ID #	Facility Name	Facility Desc. (if applicable)	VOC (2018 CARB)	VOC (2024 District)	Rules Evaluated that Apply to San Diego County Major Source Facilities						
					67.22	67.24	68	68.1	69	69.2	69.2.1
19	<b>NASSCO / General Dynamics</b>	<b>Shipbuilder</b>	<b>105.6</b>	<b>119.9</b>	-	-	-	-	-	-	-
91	<b>Sfpp Lp / Sante Fe Pacific Pipeline</b>	<b>Fuel Terminal</b>	<b>57.7</b>	<b>67.72</b>	-	-	-	-	-	-	-
94	<b>USN North Island (minus TSE)</b>	<b>Military</b>	<b>36.4</b>	<b>45.73</b>	-	-	-	-	-	-	-
3680	<b>SD City/ Pt. Loma Trmt. Plant</b>	<b>Wastewater</b>	<b>29</b>	<b>35.95</b>	-	-	-	-	-	<b>X</b>	-
4845	<b>USN Naval Station (minus TSE)</b>	<b>Military</b>	<b>25.5</b>	<b>27.02</b>	-	-	-	-	-	-	-
6068	Toro Energy of California	Power Generation	1.7	23.42	-	-	-	-	-	-	-
4824	USMC Air Stat-Miramar	Military	23.7	18.78	-	-	-	-	-	-	-
673	California Products	Signs	16.4	16.4	-	-	-	-	-	-	-
1795	Solar Turbines-Ruffin Rd	Turbine Mfr.	15.9	16.1	-	-	-	-	-	X	-
221	USMC Camp Pendleton	Military	41.5	13.21	-	-	-	-	-	-	-
118	CP Kelco	Kelp Processing	12.9	11.95	-	-	-	-	-	-	-
96655	COSTCO Wholesale	Gas Station	14.5	7.006	-	-	-	-	-	-	-
98102	COSTCO Wholesale	Gas Station	13.9	6.23	-	-	-	-	-	-	-
97026	COSTCO Wholesale	Gas Station	13.4	5.173	-	-	-	-	-	-	-
97360	COSTCO Wholesale	Gas Station	12.7	4.895	-	-	-	-	-	-	-
9541	COSTCO Wholesale	Gas Station	13.6	4.4	-	-	-	-	-	-	-
6656	CA ST of Dept. of Corrections	Detention Facility	13.9	1.535	-	X	-	-	-	X	-
99	Rohr Industries. (Goodrich)	Aviation	14.2	0.6447	-	-	-	-	-	-	-
935	Frazee Paint	Paint	20.8	0.06331	-	-	-	-	-	-	-
73	Cabrillo Pwr1-Encina	Power Generation	19	0.02707	-	-	-	-	-	-	-

### NOTES:

-**Bold and Italic** denotes a source which has been evaluated and determined to conclusively be a major source (25 tons per year or more), based on CARB and/or recent District data. Grey denotes a large source that demonstrated actual emissions within 50% (12.5 tons) of being a major source, based either on 2018 CARB Facility Search Data or 2024 District data.

-Four landfills in CARB’s 2018 emission inventory report VOC emissions over 12.5 tons per year. These include “SD City of Miramar” (Source ID #88196), “Sycamore Landfill Inc” (Source ID #8719), “Otay Landfill Inc.” (Source ID #7263), and “SD Cnty/ San Marcos II Landfill” (Source ID #8717). However, the CARB data includes fugitive landfill emissions, which are not included in the federal determination of a major source. Non-fugitive emissions from each of these four facilities is less than two tons of VOC per year. Thus, these four facilities have not been included in Attachment D as a major source of VOC.

## ATTACHMENT D – Major Sources in San Diego County Subject to District Rules

### Attachment D – Major Sources in San Diego County Subject to District Rules, page D-6, is also revised to the following:

The row for the facility Hydranautics (APCD Source ID # 0651) has been removed from the table as new facility information is available. Hydranautics has emitted less than 9.6 tons/year of VOC since 2018, demonstrating a pattern of operational consistency and therefore not subject to RACT review. There are now also no major sources subject to Rule 67.5. District VOC data for all facilities has also been updated to Year 2024.

APCD Source ID #	Facility Name	Facility Desc. (if applicable)	VOC (2018 CARB)	VOC (2024 District)	Rules Evaluated that Apply to San Diego County Major Source Facilities					
					69.2.2*	69.3	69.3.1	69.4 (To Be Repealed)	69.4.1	69.5
<b>19</b>	<b>NASSCO / General Dynamics</b>	<b>Shipbuilder</b>	<b>105.6</b>	<b>119.9</b>	-	-	-	-	X	-
<b>91</b>	<b>Sfpp Lp/ Sante Fe Pacific Pipeline</b>	<b>Fuel Terminal</b>	<b>57.7</b>	<b>67.72</b>	-	-	-	-	X	-
<b>94</b>	<b>USN North Island (minus TSE)</b>	<b>Military</b>	<b>36.4</b>	<b>45.73</b>	-	-	-	-	X	-
<b>3680</b>	<b>SD City/ Pt. Loma Trmt. Plant</b>	<b>Wastewater</b>	<b>29</b>	<b>35.95</b>	-	-	-	X	X	-
<b>4845</b>	<b>USN Naval Station (minus TSE)</b>	<b>Military</b>	<b>25.5</b>	<b>27.02</b>	-	-	-	-	X	-
6068	Toro Energy of California	Power Generation	1.7	23.42	-	-	-	X	X	-
4824	USMC Air Stat-Miramar	Military	23.7	18.78	-	-	-	-	X	-
673	California Products	Signs	16.4	16.4	-	-	-	-	-	-
1795	Solar Turbines-Ruffin Rd	Turbine Mfr.	15.9	16.1	-	-	-	-	-	-
221	USMC Camp Pendleton	Military	41.5	13.21	-	-	-	-	X	-
118	CP Kelco	Kelp Processing	12.9	11.95	-	X	X	-	-	-
96655	COSTCO Wholesale	Gas Station	14.5	7.006	-	-	-	-	X	-
98102	COSTCO Wholesale	Gas Station	13.9	6.23	-	-	-	-	X	-
97026	COSTCO Wholesale	Gas Station	13.4	5.173	-	-	-	-	X	-
97360	COSTCO Wholesale	Gas Station	12.7	4.895	-	-	-	-	X	-
9541	COSTCO Wholesale	Gas Station	13.6	4.4	-	-	-	-	-	-
6656	CA ST of Dept. of Corrections	Detention Facility	13.9	1.535	-	X	X	-	X	-
99	Rohr Industries. (Goodrich)	Aviation	14.2	0.6447	-	-	-	-	X	-
935	Frazee Paint	Paint	20.8	0.06331	-	-	-	-	-	-
73	Cabrillo Pwr1-Encina	Power Generation	19	0.02707	-	-	X	-	X	-

#### NOTES:

-**Bold and Italic** denotes a source which has been evaluated and determined to conclusively be a major source (25 tons per year or more), based on CARB and/or recent District data. Grey denotes a large source that demonstrated actual emissions within 50% (12.5 tons) of being a major source, based either on 2018 CARB Facility Search Data or 2024 District data.

-Four landfills in CARB's 2018 emission inventory report VOC emissions over 12.5 tons per year. These include "SD City of Miramar" (Source ID #88196), "Sycamore Landfill Inc" (Source ID #8719), "Otay Landfill Inc." (Source ID #7263), and "SD Cnty/ San Marcos II Landfill" (Source ID #8717). However, the CARB data includes fugitive landfill emissions, which are not included in the federal determination of a major source. Non-fugitive emissions from each of these four facilities is less than two tons of VOC per year. Thus, these four facilities have not been included in Attachment D as a major source of VOC.

\* *Rule 69.2.2* intends to control a previously unregulated source category in San Diego County. Consequently, the District does not currently have sufficient data as to what major sources have units in the applicable size range. However, for RACT purposes, it was assumed at least one of the sources listed in the table had an operational unit subject to the proposed rule, thus making it subject to RACT requirements.



**Attachment D – Major Sources in San Diego County Subject to District Rules, page D-7, is also revised to the following:**

The row for the facility Hydranautics (APCD Source ID # 0651) has been removed from the table as new facility information is available. Hydranautics has emitted less than 9.6 tons/year of VOC since 2018, demonstrating a pattern of operational consistency and therefore not subject to RACT review. There are now also no major sources subject to Rule 67.5. District VOC data for all facilities has also been updated to Year 2024.

APCD Source ID #	Facility Name	Facility Desc. (if applicable)	VOC (2018 CARB)	VOC (2024 District)	Rules Evaluated that Apply to San Diego County Major Source Facilities		
					69.5.1	69.6	69.7
<b>19</b>	<b>NASSCO / General Dynamics</b>	<b>Shipbuilder</b>	<b>105.6</b>	<b>119.9</b>	-	-	-
<b>91</b>	<b>Sfpp Lp / Sante Fe Pacific Pipeline</b>	<b>Fuel Terminal</b>	<b>57.7</b>	<b>67.72</b>	-	-	-
<b>94</b>	<b>USN North Island (minus TSE)</b>	<b>Military</b>	<b>36.4</b>	<b>45.73</b>	-	-	-
<b>3680</b>	<b>SD City/ Pt. Loma Trmt. Plant</b>	<b>Wastewater</b>	<b>29</b>	<b>35.95</b>	-	-	-
<b>4845</b>	<b>USN Naval Station (minus TSE)</b>	<b>Military</b>	<b>25.5</b>	<b>27.02</b>	-	-	-
6068	Toro Energy of California	Power Generation	1.7	23.42	-	-	-
4824	USMC Air Stat-Miramar	Military	23.7	18.78	-	-	-
673	California Products	Signs	16.4	16.4	-	-	-
1795	Solar Turbines-Ruffin Rd	Turbine Mfr.	15.9	16.1	-	-	-
221	USMC Camp Pendleton	Military	41.5	13.21	-	-	-
118	CP Kelco	Kelp Processing	12.9	11.95	-	-	-
96655	COSTCO Wholesale	Gas Station	14.5	7.006	-	-	-
98102	COSTCO Wholesale	Gas Station	13.9	6.23	-	-	-
97026	COSTCO Wholesale	Gas Station	13.4	5.173	-	-	-
97360	COSTCO Wholesale	Gas Station	12.7	4.895	-	-	-
9541	COSTCO Wholesale	Gas Station	13.6	4.4	-	-	-
6656	CA ST of Dept. of Corrections	Detention Facility	13.9	1.535	-	-	-
99	Rohr Industries. (Goodrich)	Aviation	14.2	0.6447	-	-	-
935	Frazee Paint	Paint	20.8	0.06331	-	-	-
73	Cabrillo Pwr1-Encina	Power Generation	19	0.02707	-	-	-

**NOTES:**

**-Bold and Italic** denotes a source which has been evaluated and determined to conclusively be a major source (25 tons per year or more), based on CARB and/or recent District data. **Grey** denotes a large source that demonstrated actual emissions within 50% (12.5 tons) of being a major source, based either on 2018 CARB Facility Search Data or 2018 District data.

-Four landfills in CARB's 2018 emission inventory report VOC emissions over 12.5 tons per year. These include "SD City of Miramar" (Source ID #88196), "Sycamore Landfill Inc" (Source ID #8719), "Otay Landfill Inc." (Source ID #7263), and "SD Cnty/ San Marcos II Landfill" (Source ID #8717). However, the CARB data includes fugitive landfill emissions, which are not included in the federal determination of a major source. Non-fugitive emissions from each of these four facilities is less than two tons of VOC per year. Thus, these four facilities have not been included in Attachment D as a major source of VOC.

**Attachment D – Major Sources in San Diego County Subject to District Rules, page D-8, is also revised to the following:**

District NOx data for all facilities has been updated to Year 2024.

APCD Source ID #	Facility Name	Facility Desc. (if applicable)	NOx (2018 CARB)	NOx (2024 District)	Rules Evaluated that Apply to San Diego County Major Source Facilities								
					59	59.1	61	61.1	61.2	61.3	61.3.1	61.4	61.4.1
<b>7263</b>	<b>Otay Landfill Inc.</b>	<b>Flares</b>	<b>23.6</b>	<b>66.9</b>	<b>X</b>	-	-	-	-	-	-	-	-
<b>1795</b>	<b>Solar Turbines-Ruffin Rd</b>	<b>Turbine Mfr.</b>	<b>90.4</b>	<b>56.73</b>	-	-	-	-	-	-	-	-	-
<b>10882</b>	<b>Otay Mesa Energy Center</b>	<b>Power Generation</b>	<b>70.5</b>	<b>48.84</b>	-	-	-	-	-	-	-	-	-
<b>96387</b>	<b>Minnesota Methane San Diego LLC/Neo San Diego LLC</b>	<b>Power Generation</b>	<b>49.1</b>	<b>44.13</b>	-	-	-	-	-	-	-	-	-
<b>118</b>	<b>CP Kelco</b>	<b>Kelp Processing</b>	<b>38</b>	<b>31.87</b>	-	-	-	-	-	-	-	-	-
8013	SDG&E Palomar Energy Center	Power Generation	52	23.68	-	-	-	-	-	-	-	-	-
3680	SD City/ Pt. Loma Trmt. Plant	Wastewater	38.5	23.23	-	-	-	-	-	-	-	-	-
100	GKN Aerospace Chemtronics	Aviation	21.4	22.92	-	-	-	-	-	-	-	-	-
5985	Encina Waste Water Authority	Wastewater Treatment	19.3	19.08	-	-	-	-	-	-	-	-	-
221	USMC Camp Pendleton	Military	29.9	18.03	-	-	-	-	-	-	-	-	-
6068	Toro Energy of California	Power Generation	43.7	17.33	-	-	-	-	-	-	-	-	-
96224	Minnesota Methane LLC	Power Generation	30	17.31	-	-	-	-	-	-	-	-	-
1969	Southern Calif. Edison Co.	Power Generation	4.8	15.62	-	-	X	-	-	X	X	X	X
6257	Sycamore Energy LLC	Power Generation	17	15.12	-	-	-	-	-	-	-	-	-
8719	Sycamore Landfill Inc.	Flares	16.1	14.95	-	X	-	-	-	-	-	-	-
351	SD State University	College	50.8	14.85	-	-	-	-	-	-	-	-	-
4824	USMC Air Stat-Miramar	Military	15.6	13.12	-	-	X	X	X	X	X	X	X
89296	SD Metro Pumping Station #2	Wastewater Treatment	12.9	10.56	-	-	-	-	-	-	-	-	-
73	Cabrillo Pwr1-Encina	Power Generation	45.9	9.62	-	-	-	-	-	-	-	-	-
415	Appl. Energy-NAV STA	Power Generation	45.4	5.037	-	-	-	-	-	-	-	-	-
149	Appl. Energy-MCRD	Power Generation	35.2	3.87	-	-	-	-	-	-	-	-	-
167	Solar Turbines-Pacific Hwy	Turbine Mfr.	14.1	3.49	-	-	-	-	-	-	-	-	-
171	Grossmont District Hospital	Hospital	19.2	3.477	-	-	-	-	-	-	-	-	-
8717	SD Cnty/ San Marcos II Landfill	Flares	11.8	3.42	X	-	-	-	-	-	-	-	-
8469	Goal Line LP	Power Generation	14.5	0.7723	-	-	-	-	-	-	-	-	-

**NOTES:**

**-Bold and Italic** denotes a source which has been evaluated and determined to conclusively be a major source (25 tons per year or more), based on CARB and/or recent District data. Grey denotes a large source that demonstrated actual emissions within 50% (12.5 tons) of being a major source, based either on 2018 CARB Facility Search Data or 2024 District data.

**Attachment D – Major Sources in San Diego County Subject to District Rules, page D-9, is also revised to the following:**

District NOx data for all facilities has been updated to Year 2024.

APCD Source ID #	Facility Name	Facility Desc. (if applicable)	NOx (2018 CARB)	NOx (2024 District)	Rules Evaluated that Apply to San Diego County Major Source Facilities								
					61.5	61.6	61.7	61.8	64	66.1	67.0.1	67.1	67.2
<b>7263</b>	<b>Otay Landfill Inc.</b>	<b>Flares</b>	<b>23.6</b>	<b>66.9</b>	-	-	-	-	-	-	-	-	-
<b>1795</b>	<b>Solar Turbines-Ruffin Rd</b>	<b>Turbine Mfr.</b>	<b>90.4</b>	<b>56.73</b>	-	-	-	-	-	-	<b>X</b>	-	-
<b>10882</b>	<b>Otay Mesa Energy Center</b>	<b>Power Generation</b>	<b>70.5</b>	<b>48.84</b>	-	-	-	-	-	-	-	-	-
<b>96387</b>	<b>Minnesota Methane San Diego LLC/Neo San Diego LLC</b>	<b>Power Generation</b>	<b>49.1</b>	<b>44.13</b>	-	-	-	-	-	-	-	-	-
<b>118</b>	<b>CP Kelco</b>	<b>Kelp Processing</b>	<b>38</b>	<b>31.87</b>	-	-	-	-	-	-	-	-	-
8013	SDG&E Palomar Energy Center	Power Generation	52	23.68	-	-	-	-	-	-	-	-	-
3680	SD City/ Pt. Loma Trmt. Plant	Wastewater	38.5	23.23	-	-	-	-	-	-	X	-	-
100	GKN Aerospace Chemtronics	Aviation	21.4	22.92	-	-	-	-	-	-	-	-	-
5985	Encina Waste Water Authority	Wastewater Treatment	19.3	19.08	-	-	-	-	-	-	-	-	-
221	USMC Camp Pendleton	Military	29.9	18.03	-	-	-	-	-	-	-	-	-
6068	Toro Energy of California	Power Generation	43.7	17.33	-	-	-	-	-	-	-	-	-
96224	Minnesota Methane LLC	Power Generation	30	17.31	-	-	-	-	-	-	-	-	-
1969	Southern Calif. Edison Co.	Power Generation	4.8	15.62	-	-	-	X	-	-	-	-	-
6257	Sycamore Energy LLC	Power Generation	17	15.12	-	-	-	-	-	-	-	-	-
8719	Sycamore Landfill Inc.	Flares	16.1	14.95	-	-	-	-	-	-	X	-	-
351	SD State University	College	50.8	14.85	-	-	-	-	-	X	-	-	-
4824	USMC Air Stat-Miramar	Military	15.6	13.12	-	-	-	X	-	-	-	-	-
89296	SD Metro Pumping Station #2	Wastewater Treatment	12.9	10.56	-	-	-	-	-	-	-	-	-
73	Cabrillo Pwr1-Encina	Power Generation	45.9	9.62	-	-	-	-	-	-	-	-	-
415	Appl. Energy-NAV STA	Power Generation	45.4	5.037	-	-	-	-	-	-	-	-	-
149	Appl. Energy-MCRD	Power Generation	35.2	3.87	-	-	-	-	-	-	-	-	-
167	Solar Turbines-Pacific Hwy	Turbine Mfr.	14.1	3.49	-	-	-	-	-	-	-	-	-
171	Grossmont District Hospital	Hospital	19.2	3.477	-	-	-	-	-	-	-	-	-
8717	SD Cnty/ San Marcos II Landfill	Flares	11.8	3.42	-	-	-	-	-	-	-	-	-
8469	Goal Line LP	Power Generation	14.5	0.7723	-	-	-	-	-	-	-	-	-

**NOTES:**

**-Bold and Italic** denotes a source which has been evaluated and determined to conclusively be a major source (25 tons per year or more), based on CARB and/or recent District data. Grey denotes a large source that demonstrated actual emissions within 50% (12.5 tons) of being a major source, based either on 2018 CARB Facility Search Data or 2024 District data.

**Attachment D – Major Sources in San Diego County Subject to District Rules, page D-10, is also revised to the following:**

District NOx data for all facilities has been updated to Year 2024.

APCD Source ID #	Facility Name	Facility Desc. (if applicable)	NOx (2018 CARB)	NOx (2024 District)	Rules Evaluated that Apply to San Diego County Major Source Facilities								
					67.3	67.4	67.5	67.6	67.6.1	67.6.2	67.7	67.9	67.1
<b>7263</b>	<b>Otay Landfill Inc.</b>	<b>Flares</b>	<b>23.6</b>	<b>66.9</b>	-	-	-	-	-	-	-	-	-
<b>1795</b>	<b>Solar Turbines-Ruffin Rd</b>	<b>Turbine Mfr.</b>	<b>90.4</b>	<b>56.73</b>	X	-	-	-	-	-	-	-	-
<b>10882</b>	<b>Otay Mesa Energy Center</b>	<b>Power Generation</b>	<b>70.5</b>	<b>48.84</b>	-	-	-	-	-	-	-	-	-
<b>96387</b>	<b>Minnesota Methane San Diego LLC/Neo San Diego LLC</b>	<b>Power Generation</b>	<b>49.1</b>	<b>44.13</b>	-	-	-	-	-	-	-	-	-
<b>118</b>	<b>CP Kelco</b>	<b>Kelp Processing</b>	<b>38</b>	<b>31.87</b>	-	-	-	-	-	-	-	-	X
8013	SDG&E Palomar Energy Center	Power Generation	52	23.68	-	-	-	-	-	-	-	-	-
3680	SD City/ Pt. Loma Trmt. Plant	Wastewater	38.5	23.23	-	-	-	-	-	-	-	-	-
100	GKN Aerospace Chemtronics	Aviation	21.4	22.92	X	-	-	-	X	X	-	X	-
5985	Encina Waste Water Authority	Wastewater Treatment	19.3	19.08	-	-	-	-	-	-	-	-	-
221	USMC Camp Pendleton	Military	29.9	18.03	X	-	-	-	-	-	-	-	-
6068	Toro Energy of California	Power Generation	43.7	17.33	-	-	-	-	-	-	-	-	-
96224	Minnesota Methane LLC	Power Generation	30	17.31	-	-	-	-	-	-	-	-	-
1969	Southern Calif. Edison Co.	Power Generation	4.8	15.62	X	-	-	-	X	X	-	-	-
6257	Sycamore Energy LLC	Power Generation	17	15.12	-	-	-	-	-	-	-	-	-
8719	Sycamore Landfill Inc.	Flares	16.1	14.95	-	-	-	-	-	-	-	-	-
351	SD State University	College	50.8	14.85	-	-	-	-	-	-	-	-	-
4824	USMC Air Stat-Miramar	Military	15.6	13.12	X	-	-	-	-	-	-	X	-
89296	SD Metro Pumping Station #2	Wastewater Treatment	12.9	10.56	-	-	-	-	-	-	-	-	-
73	Cabrillo Pwr1-Encina	Power Generation	45.9	9.62	X	-	-	-	-	-	-	-	-
415	Appl. Energy-NAV STA	Power Generation	45.4	5.037	-	-	-	-	-	-	-	-	-
149	Appl. Energy-MCRD	Power Generation	35.2	3.87	-	-	-	-	-	-	-	-	-
167	Solar Turbines-Pacific Hwy	Turbine Mfr.	14.1	3.49	X	-	-	-	-	-	-	-	-
171	Grossmont District Hospital	Hospital	19.2	3.477	-	-	-	-	-	-	-	-	-
8717	SD Cnty/ San Marcos II Landfill	Flares	11.8	3.42	-	-	-	-	-	-	-	-	-
8469	Goal Line LP	Power Generation	14.5	0.7723	-	-	-	-	-	-	-	-	-

**NOTES:**

**-Bold and Italic** denotes a source which has been evaluated and determined to conclusively be a major source (25 tons per year or more), based on CARB and/or recent District data. Grey denotes a large source that demonstrated actual emissions within 50% (12.5 tons) of being a major source, based either on 2018 CARB Facility Search Data or 2024 District data.

**Attachment D – Major Sources in San Diego County Subject to District Rules, page D-11, is also revised to the following:**

District NOx data for all facilities has been updated to Year 2024.

APCD Source ID #	Facility Name	Facility Desc. (if applicable)	NOx (2018 CARB)	NOx (2024 District)	Rules Evaluated that Apply to San Diego County Major Source Facilities								
					67.11	67.12.1	67.15	67.16	67.17	67.18	67.19	67.20.1	67.21
<b>7263</b>	<b>Otay Landfill Inc.</b>	<b>Flares</b>	<b>23.6</b>	<b>66.9</b>	-	-	-	-	-	-	-	-	-
<b>1795</b>	<b>Solar Turbines-Ruffin Rd</b>	<b>Turbine Mfr.</b>	<b>90.4</b>	<b>56.73</b>	-	-	-	-	-	-	-	-	-
<b>10882</b>	<b>Otay Mesa Energy Center</b>	<b>Power Generation</b>	<b>70.5</b>	<b>48.84</b>	-	-	-	-	-	-	-	-	-
<b>96387</b>	<b>Minnesota Methane San Diego LLC/Neo San Diego LLC</b>	<b>Power Generation</b>	<b>49.1</b>	<b>44.13</b>	-	-	-	-	-	-	-	-	-
<b>118</b>	<b>CP Kelco</b>	<b>Kelp Processing</b>	<b>38</b>	<b>31.87</b>	-	-	-	-	-	-	-	-	-
8013	SDG&E Palomar Energy Center	Power Generation	52	23.68	-	-	-	-	-	-	-	-	-
3680	SD City/ Pt. Loma Trmt. Plant	Wastewater	38.5	23.23	-	-	-	-	X	-	-	-	-
100	GKN Aerospace Chemtronics	Aviation	21.4	22.92	X	-	-	-	X	X	-	X	-
5985	Encina Waste Water Authority	Wastewater Treatment	19.3	19.08	-	-	-	-	-	-	-	-	-
221	USMC Camp Pendleton	Military	29.9	18.03	-	-	-	-	X	-	-	X	-
6068	Toro Energy of California	Power Generation	43.7	17.33	-	-	-	-	X	-	-	-	-
96224	Minnesota Methane LLC	Power Generation	30	17.31	-	-	-	-	-	-	-	-	-
1969	Southern Calif. Edison Co.	Power Generation	4.8	15.62	X	-	-	-	X	-	-	X	X
6257	Sycamore Energy LLC	Power Generation	17	15.12	-	-	-	-	-	-	-	-	-
8719	Sycamore Landfill Inc.	Flares	16.1	14.95	-	-	-	-	X	-	-	-	-
351	SD State University	College	50.8	14.85	X	-	-	-	X	-	-	-	X
4824	USMC Air Stat-Miramar	Military	15.6	13.12	-	-	-	-	X	-	-	-	-
89296	SD Metro Pumping Station #2	Wastewater Treatment	12.9	10.56	-	-	-	-	-	-	-	-	-
73	Cabrillo Pwr1-Encina	Power Generation	45.9	9.62	-	-	-	-	X	X	-	-	-
415	Appl. Energy-NAV STA	Power Generation	45.4	5.037	-	-	-	-	-	-	-	-	-
149	Appl. Energy-MCRD	Power Generation	35.2	3.87	-	-	-	-	-	-	-	-	-
167	Solar Turbines-Pacific Hwy	Turbine Mfr.	14.1	3.49	X	-	-	-	X	-	-	-	-
171	Grossmont District Hospital	Hospital	19.2	3.477	-	-	-	-	-	-	-	-	-
8717	SD Cnty/ San Marcos II Landfill	Flares	11.8	3.42	-	-	-	-	-	-	-	-	-
8469	Goal Line LP	Power Generation	14.5	0.7723	-	-	-	-	-	-	-	-	-

**NOTES:**

**-Bold and Italic** denotes a source which has been evaluated and determined to conclusively be a major source (25 tons per year or more), based on CARB and/or recent District data. Grey denotes a large source that demonstrated actual emissions within 50% (12.5 tons) of being a major source, based either on 2018 CARB Facility Search Data or 2024 District data.

## ATTACHMENT D – Major Sources in San Diego County Subject to District Rules

### Attachment D – Major Sources in San Diego County Subject to District Rules, page D-12, is also revised to the following:

Rule 68 is no longer applicable to “CabrilloPwr1-Encina” (APCD Source ID# 0073), “Appl. Energy-NAV STA” (APCD Source ID# 0415), and “Appl. Energy-MCRD” (APCD Source ID# 0149) facilities and therefore the “X” has been removed.

The column for “67.25 (Proposed)” has also been removed since there are no longer plans to adopt that Rule.

District NOx data for all facilities has been updated to Year 2024.

APCD Source ID #	Facility Name	Facility Desc. (if applicable)	NOx (2018 CARB)	NOx (2024 District)	Rules Evaluated that Apply to San Diego County Major Source Facilities							
					67.22	67.24	68	68.1	69	69.2	69.2.1	69.2.2*
<b>7263</b>	<b>Otay Landfill Inc.</b>	<b>Flares</b>	<b>23.6</b>	<b>66.9</b>	-	-	-	-	-	-	-	-
<b>1795</b>	<b>Solar Turbines-Ruffin Rd</b>	<b>Turbine Mfr.</b>	<b>90.4</b>	<b>56.73</b>	-	-	-	-	-	<b>X</b>	-	-
<b>10882</b>	<b>Otay Mesa Energy Center</b>	<b>Power Generation</b>	<b>70.5</b>	<b>48.84</b>	-	-	-	-	-	-	-	-
<b>96387</b>	<b>Minnesota Methane San Diego LLC/Neo San Diego LLC</b>	<b>Power Generation</b>	<b>49.1</b>	<b>44.13</b>	-	-	-	-	-	-	-	-
<b>118</b>	<b>CP Kelco</b>	<b>Kelp Processing</b>	<b>38</b>	<b>31.87</b>	-	-	-	-	-	-	-	-
8013	SDG&E Palomar Energy Center	Power Generation	52	23.68	-	-	-	-	-	-	-	-
3680	SD City/ Pt. Loma Trmt. Plant	Wastewater	38.5	23.23	-	-	-	-	-	<b>X</b>	-	-
100	GKN Aerospace Chemtronics	Aviation	21.4	22.92	-	-	-	-	-	-	-	-
5985	Encina Waste Water Authority	Wastewater Treatment	19.3	19.08	-	-	-	-	-	-	-	-
221	USMC Camp Pendleton	Military	29.9	18.03	-	-	-	-	-	-	-	-
6068	Toro Energy of California	Power Generation	43.7	17.33	-	-	-	-	-	-	-	-
96224	Minnesota Methane LLC	Power Generation	30	17.31	-	-	-	-	-	-	-	-
1969	Southern Calif. Edison Co.	Power Generation	4.8	15.62	-	-	-	-	-	<b>X</b>	-	-
6257	Sycamore Energy LLC	Power Generation	17	15.12	-	-	-	-	-	-	-	-
8719	Sycamore Landfill Inc.	Flares	16.1	14.95	-	-	-	-	-	-	-	-
351	SD State University	College	50.8	14.85	-	-	-	-	-	<b>X</b>	<b>X</b>	-
4824	USMC Air Stat-Miramar	Military	15.6	13.12	-	-	-	-	-	-	-	-
89296	SD Metro Pumping Station #2	Wastewater Treatment	12.9	10.56	-	-	-	-	-	-	-	-
73	Cabrillo Pwr1-Encina	Power Generation	45.9	9.62	-	-	-	-	-	-	-	-
415	Appl. Energy-NAV STA	Power Generation	45.4	5.037	-	-	-	-	-	<b>X</b>	-	-
149	Appl. Energy-MCRD	Power Generation	35.2	3.87	-	-	-	-	-	<b>X</b>	-	-
167	Solar Turbines-Pacific Hwy	Turbine Mfr.	14.1	3.49	-	-	-	-	-	-	-	-
171	Grossmont District Hospital	Hospital	19.2	3.477	-	-	-	-	-	<b>X</b>	-	-
8717	SD Cnty/ San Marcos II Landfill	Flares	11.8	3.42	-	-	<b>X</b>	-	-	-	-	-
8469	Goal Line LP	Power Generation	14.5	0.7723	-	-	-	-	-	<b>X</b>	-	-

#### NOTES:

**-Bold and Italic** denotes a source which has been evaluated and determined to conclusively be a major source (25 tons per year or more), based on CARB and/or recent District data. **Grey** denotes a large source that demonstrated actual emissions within 50% (12.5 tons) of being a major source, based either on 2018 CARB Facility Search Data or 2024 District data.

\* **Rule 69.2.2** intends to control a previously unregulated source category in San Diego County. Consequently, the District does not currently have sufficient data as to what major sources have units in the applicable size range. However, for RACT purposes, it was assumed at least one of the sources listed in the table had an operational unit subject to the proposed rule, thus making it subject to RACT requirements.

**Attachment D – Major Sources in San Diego County Subject to District Rules, page D-13, is also revised to the following:**

District NOx data for all facilities has been updated to Year 2024.

The column “Flare Rule (#TBD)” has been revised to 69.7.

APCD Source ID #	Facility Name	Facility Desc. (if applicable)	NOx (2018 CARB)	NOx (2024 District)	Rules Evaluated that Apply to San Diego County Major Source Facilities							
					69.3	69.3.1	69.4 (To Be Repealed)	69.4.1	69.5	69.5.1	69.6	69.7
<b>7263</b>	<b>Otay Landfill Inc.</b>	<b>Flares</b>	<b>23.6</b>	<b>66.9</b>	-	-	X	X	-	-	-	X
<b>1795</b>	<b>Solar Turbines-Ruffin Rd</b>	<b>Turbine Mfr.</b>	<b>90.4</b>	<b>56.73</b>	-	-	-	-	-	-	-	-
<b>10882</b>	<b>Otay Mesa Energy Center</b>	<b>Power Generation</b>	<b>70.5</b>	<b>48.84</b>	-	X	X	X	-	-	-	-
<b>96387</b>	<b>Minnesota Methane San Diego LLC/Neo San Diego LLC</b>	<b>Power Generation</b>	<b>49.1</b>	<b>44.13</b>	-	-	-	X	-	-	-	X
<b>118</b>	<b>CP Kelco</b>	<b>Kelp Processing</b>	<b>38</b>	<b>31.87</b>	X	X	-	-	-	-	-	-
8013	SDG&E Palomar Energy Center	Power Generation	52	23.68	X	X	-	X	-	-	-	-
3680	SD City/ Pt. Loma Trmt. Plant	Wastewater	38.5	23.23	-	-	X	X	-	-	-	-
100	GKN Aerospace Chemtronics	Aviation	21.4	22.92	-	-	-	X	-	-	-	-
5985	Encina Waste Water Authority	Wastewater Treatment	19.3	19.08	-	-	-	X	-	-	-	-
221	USMC Camp Pendleton	Military	29.9	18.03	-	-	-	X	-	-	-	-
6068	Toro Energy of California	Power Generation	43.7	17.33	-	-	X	X	-	-	-	-
96224	Minnesota Methane LLC	Power Generation	30	17.31	-	-	X	X	-	-	-	-
1969	Southern Calif. Edison Co.	Power Generation	4.8	15.62	-	-	-	X	-	-	-	-
6257	Sycamore Energy LLC	Power Generation	17	15.12	-	-	-	-	-	-	-	-
8719	Sycamore Landfill Inc.	Flares	16.1	14.95	-	-	-	-	-	-	-	X
351	SD State University	College	50.8	14.85	X	X	-	X	-	-	-	-
4824	USMC Air Stat-Miramar	Military	15.6	13.12	-	-	-	X	-	-	-	-
89296	SD Metro Pumping Station #2	Wastewater Treatment	12.9	10.56	-	-	X	X	-	-	-	-
73	Cabrillo Pwr1-Encina	Power Generation	45.9	9.62	-	X	-	X	-	-	-	-
415	Appl. Energy-NAV STA	Power Generation	45.4	5.037	X	X	-	-	-	-	-	-
149	Appl. Energy-MCRD	Power Generation	35.2	3.87	X	X	-	X	-	-	-	-
167	Solar Turbines-Pacific Hwy	Turbine Mfr.	14.1	3.49	-	-	-	X	-	-	-	-
171	Grossmont District Hospital	Hospital	19.2	3.477	-	X	-	X	-	-	-	-
8717	SD Cnty/ San Marcos II Landfill	Flares	11.8	3.42	-	-	-	-	-	-	-	X
8469	Goat Line LP	Power Generation	14.5	0.7723	-	X	-	-	-	-	-	-

**NOTES:**

**-Bold and Italic** denotes a source which has been evaluated and determined to conclusively be a major source (25 tons per year or more), based on CARB and/or recent District data. **Grey** denotes a large source that demonstrated actual emissions within 50% (12.5 tons) of being a major source, based either on 2018 CARB Facility Search Data or 2024 District data.

**Attachment E – District Rules Evaluated for 2020 RACT, page E-12, is also revised to the following:**

For the Rule 68 row, the “RACT Analysis Findings” column has been updated from “Supplemented as RACT by “69-series” rules” to “SOURCE CATEGORY NO LONGER SUBJECT TO RACT REQUIREMENTS BECAUSE NO MAJOR SOURCES.”

Rule	Rule Title	CTG/ ACT?	Date First Adopted	Date Last Revised	EPA Action	FR Publication Date	FR Rule Approval	RACT Analysis Findings	SIP Submittal/ Approval Status
67.24	Bakery Ovens	Yes	6/7/94	5/15/96	Approved	3/27/97	62 FR 14639	SOURCE CATEGORY NO LONGER SUBJECT TO RACT REQUIREMENTS BECAUSE NO MAJOR SOURCES.	
67.25 (Proposed)	Composting Operations (Non- Residential)	No	TBD	N/A	-	-	-	SOURCE CATEGORY NOT SUBJECT TO RACT REQUIREMENTS.	Not being submitted into SIP upon adoption
68	Fuel-Burning Equipment- Oxides of Nitrogen	No	7/1/71	9/20/94	Approved	4/9/96	61 FR 15719	SOURCE CATEGORY NO LONGER SUBJECT TO RACT REQUIREMENTS BECAUSE NO MAJOR SOURCES.	
68.1	NSPS Requirements for Oxides of Nitrogen from Fuel Burning Equipment	No	11/18/76	N/A	-	-	-	NOT SUBJECT TO RACT REQUIREMENTS.	Not being submitted into SIP
69	Electrical Generating Steam Boilers, Replacement Units and New Units	No	1/18/94	12/12/95	-	-	-	NO MAJOR SOURCES. NOT SUBJECT TO RACT REQUIREMENTS.	No sources applicable as of 1/1/19. Not being submitted into SIP.