

STATEMENT OF BASIS
Title V Permit Renewal

Facility Name: City of San Diego Public Utilities Department – Metro Biosolids Center

Title V App. Number: APCD2020-APP-006321

Title V Permit Number: APCD2003-TVP-972673

Facility ID: APCD1994-SITE-07517

Equipment Address: 5240 Convoy St. San Diego, CA 92111

Facility Contact: Wendy Johnson

Contact Phone: 619-758-2376

Permit Engineer: Andrew Bernabe

Date: May 15, 2026

 Recoverable Signature

X Nicholas Horres

Nicholas Horres
Senior Engineer

Signed by: e933f2c8-9225-4b84-9a71-81071ff0330b

Senior Engineer:

1.0 Type of Action and Summary of Changes

This application is for a renewal of the Title V permit for City of San Diego Metropolitan Biosolids Center (Title V permit APCD2003-TVP-972673). This facility is subject to Title V permitting because it is on contiguous property with another Major Stationary Source also owned by the City of San Diego: Miramar Landfill.

2.0 History of Title V Applications and Modifications/Applications since previous Renewal:

The renewal application was received on June 9, 2020. This renewal application was submitted at least 12 months but not more than 18 months prior to permit expiration, in accordance with Rule 1410. Therefore, the renewal application is timely.

The following table summarizes all previous applications at this facility affecting the Title V permit APCD2003-TVP-972673. For each application that is included in this action, an analysis

and justification for meeting the indicated modification type is described later in sections 5, 10 and 11 of this report.

| Title V Application History Since Previous Title V Permit Renewal | | | |
|--|--|---|--------------------------|
| Application Number | Application Description/Type | Affected Emission Units | Outcome |
| APCD2016-APP-004398 | 502(b)(10) Change – eliminate seasonal variation limits on H2S concentration of digester gas while maintaining annual average limit of 40 ppm. | Sludge digesters - APCD2006-PTO-931030 | Approved |
| APCD2016-APP-004509 | Administrative Amendment: Contact Information Change | N/A | Approved |
| APCD2016-APP-004708 | 502(b)(10) Change – simplify and clarify permit language | Wastewater Pump Station – APCD2009-PTO-931031 | Approved |
| APCD2017-APP-005032 | Minor Modification – addition of 5 portable engines to supplement operations | 5 portable engines - APCD2018-PTO-002990 | Approved |
| APCD2017-APP-005226 | 502(b)(10) Change – simplify and clarify permit language | Sludge digesters - APCD2006-PTO-931030 | Approved |
| APCD2019-APP-006052 | Administrative Amendment: Contact Information Change | N/A | Approved |
| APCD2020-APP-006321 | Renewal | Entire TVP | Pending – Current Action |

Since the previous renewal, the District has received applications from this facility as shown in the following table. These applications are submitted under the District’s local permitting program and typically are associated with a corresponding Title V application to implement the same change to the Title V permit once the modified local permit is issued (see appendix A of the permit).

| Application History for facility since most recent renewal | | | | |
|---|--------------------------------------|--|--------------------------------|----------------|
| Application Number | Affected Permit to Operate(s) | Description/Related Title V Application | Affected Emission Units | Outcome |
| APCD2016-APP-004399 | APCD2006-PTO-931030 | Update permit conditions to change conditions from season variation of H2S limits to annual averages. Related to Title V app APCD2016-APP-004398 | Sludge Digesters | Approved |
| APCD2016-APP-004466 | APCD2009-PTO-931031 | Update permit conditions related to Title V app APCD2016-APP-004708. | Wastewater Pump Station | Approved |

| | | | | |
|---------------------|---|---|--|----------------------|
| APCD2017-APP-005031 | APCD2018-PTO-002990 | Permit 5 additional portable engines to supplement operations. Related to Title V app APCD2017-APP-005032 | Portable Engines | Approved |
| APCD2017-APP-005224 | APCD2006-PTO-931030 | Op-flex app to simplify and clarify permit conditions. Related to Title V app APCD2017-APP-005226. | Sludge Digesters | Approved |
| APCD2024-APP-008175 | APCD2006-PTO-931030, APCD2009-PTO-931031, APCD2009-PTO-931032 | Install additional digester gas flare, increase sludge processing throughput, and increase wastewater pump station capacity. Broken up into apps: APCD2025-APP-008900, -008901, and -008945 | Wastewater Pump Station, sludge digesters, sludge processing | Pending [†] |
| APCD2025-APP-008900 | APCD2009-PTO-931032 | Increase sludge processing throughput | Sludge processing | Pending [†] |
| APCD2025-APP-008901 | APCD2009-PTO-931031 | Increase wastewater pump station capacity. | Wastewater Pump Station | Pending [†] |
| APCD2025-APP-008945 | APCD2006-PTO-931030 | Install additional digester gas flare. | Sludge Digesters | Pending [†] |

[†]The facility has been informed that they need to file applications with the District for Minor Modification before operating under these permits.

3.0 Facility Description

The Metro Biosolids Center (MBC) in San Diego is a 39-acre regional facility collocated with Miramar Landfill that treats and manages biosolids produced from wastewater. Built in 1998, it replaced older sludge-drying operations at Fiesta Island. MBC receives raw solids from the North City Water Reclamation Plant (NCWRP) and digested solids from the Point Loma Wastewater Treatment Plant (PLWTP) through two dedicated pipelines. At MBC, NCWRP solids are degrittied, thickened, and anaerobically digested, then blended with PLWTP biosolids and dewatered in centrifuges before being stored and hauled off-site for beneficial use. The facility has the following permits:

| Permit Number | Equipment Description |
|---------------------|---|
| APCD2018-PTO-002990 | Up to Five (5) prime diesel engines (ATCM portable): Total combined horsepower ratings up to 500 bhp, Tier 4 certified |
| APCD2003-PTO-931028 | Boiler: 10.5 mm btu per hour, superior boiler works inc. Model ms4-x-1250, s/n 13212, with forced draft burner, flue gas recirculation, and fired on natural gas only. Operated < 220,000 therms per year. |
| APCD2003-PTO-931027 | Boiler: 10.5 mm btu/hour, superior boiler works inc., model ms4-x-1250, s/n 13211, with forced draft burner, flue gas recirculation, fired on natural gas only, operated less than 220,000 therms per year. |
| APCD2006-PTO-931030 | Three (3) anaerobic sludge digesters (2.9 million gallon capacity each) and associated pumps, chemical feed systems, piping, valves and fittings. Two (2) 1.3 million gallon bio solids storage tanks with associated piping and equipment; biogas manual and automatic pressure/vacuum release valves. |

| | |
|---------------------|---|
| | One (1) 25,000 cubic feet biogas holding tank with two (2) compressors. Biogas from the above equipment that is not routed to an on site privatized co-generator regulated under separate permits is vented to a flare system designed for 650 cubic feet biogas per minute at 500 Btu per cubic foot with two (2) enclosed ground flares equipped with optical flame detectors, automatic shut off valves, stack thermocouples, flame arrestors and sampling ports |
| APCD2009-PTO-931032 | Sludge processing operations consisting of pre-digestion operations (raw solids receiving tanks, sludge degritters, thickening centrifuges, thick-solids wet well, sludge screens, thickened solids blending tanks), and post-digestion operations (digester overflow area, de-watering centrifuges, centrifuge bins, silos, and weigh mix bins). Truck loading bays for processed biosolids (2), each consisting of: one (1) automatic and one (1) manual station, one (1) 950 ft ³ weighing and loading bin with a suspended flexible shroud for dust control, all equipment inter-connected to a foul air collection system driven by one (1) vacuum blower 1,200 hp/6,000 acfm, 1" differential pressure. Also equipped with dampers to select bay and select automatic or manual station dispatch procedure. The above operations are controlled by main odor reduction system (ORS) consisting of: three (3) trains (2 service and 1 standby) with each train consisting of: one 26,000 scfm ORS fan, one packed bed caustic scrubber, two 13,000 scfm dual bed carbon adsorption vessels and associated pumps, demisters, chemical feed systems, ph meters, ORP meters, piping, ducting and valves. The ORS also includes seven collection fans throughout the facility. The following equipment is optional use: three 8,000 scfm packed bed sulfuric acid scrubbers, associated pumps, demisters, chemical feed systems, ph meters, piping, ducting and valves. |
| APCD2009-PTO-931031 | A wastewater pump station consisting of: two (2) 340 gpm wastewater pumps and three (3) 3,000 gpm centrate pumps with an odor reduction system (ORS) consisting of two (2) trains (one service and one standby), each train consisting of one (1) 9,000 scfm packed bed water scrubber with demister (scrubber use optional) and one (1) 9,000 scfm dual bed carbon adsorption system and associated blowers, piping, ducting and valves. |
| APCD2006-PTO-972499 | Emergency engine generator, 113 hp john deere diesel engine, model 4045tf250, s/n cd4045t501837. |
| APCD2006-PTO-972498 | Emergency engine generator, 199 hp caterpillar diesel, model 3304 bt, s/n 83z10261. |
| APCD2006-PTO-972500 | Emergency engine generator, 449 hp caterpillar diesel engine, model 3306c s/n 4zr02731 |

4.0 Compliance History

| Compliance History for the Site | | |
|---------------------------------|------------------------------|---------------|
| <u>Violation Number</u> | <u>Violation Description</u> | <u>Status</u> |

| | | |
|---|--|---|
| APCD2016-HBD-00027 | Interim Variance requested as H2S levels in digester were over the 58 ppm limit in permit condition 5. | Facility was granted Interim variance from 3/12/2016 to 5/12/2016, with conditions to test twice per week for H2S, as well as an increased limit of 90 ppmv. Permits have since been updated and the facility is now in compliance. |
| APCD2016-HBD-00028 | Regular Variance requested as H2S levels in digester were over the 58 ppm limit in permit condition 5. | Facility was granted Regular Variance from 5/12/2016 to 11/12/2016 or until Permit modified. Additional Conditions: instantaneous reading of H2S not to exceed 265 ppm, average yearly H2S not to exceed 40 ppm. Permits have since been updated and the facility is now in compliance. |
| APCD2016-NOV-000191 | Maximum daily H2S content of digester gas was 60 ppm, exceeding limit of 58 ppm in permit condition 5. | Resolved – Facility granted Interim and Regular Variances which allowed operation until permit modified. |
| APCD2016-NOV-000814 | Failure to record duration and purpose of maintenance activities that resulted in flare exhaust temperature deviation, and failure to notify Air Pollution Control Officer of gas control valve breakdown. | Resolved – Flare temperature deviations, their duration and purpose were subsequently recorded. |
| APCD2016-NTC-00250 | Failure to maintain monitoring instrument calibration documentation onsite for three years from the date of calibration. | Resolved – Calibration data showing percent accuracy provided. |
| APCD2020-NOV-000225, APCD2020-NOV-000589 | Operating a diesel engine-jetter unit without a permit. | Resolved – unit’s permitting status updated and replaced with smaller engine. No remedial action was required. |
| APCD2021-NOV-000241 | Failure to change or test oil of registered off-road engine. | Resolved – No remedial action was required. |
| APCD2022-NOV-000290 | Failure to measure the H2S concentration of the digester gas twice per week on two non-consecutive days of operation (PTO-931030 condition 4). | Resolved – H2S resumed testing twice per week, with additional testing performed if H2S concentration exceeded 40 ppmv. |
| APCD2025-NOV-000347 | Uncontrolled release of biogas not associated with construction, repair | Resolved – gasket was replaced on the same day, ending the venting event. |

| | | |
|---------------------|---|--|
| | or routine preventative maintenance due to missing gasket on Digester 3. | |
| APCD2025-NOV-000830 | Uncontrolled release of biogas not associated with construction, repair or routine preventative maintenance due to valve closing. | Resolved – Valve to biogas holding tank opened to end the venting event. |
| APCD2025-NTC-00085 | Failure to notify the District of a breakdown within 2 hours within its detection. | Resolved – No remedial action was required. |
| APCD2026-NOV-000346 | Uncontrolled release of biogas not associated with construction, repair or routine preventative maintenance | Resolved – Facility determined that a leaking valve seal was resulting in uncontrolled release of gas. The valve seal was repaired the same day and facility is now in compliance. |

5.0 Title V Applicability

The Title V regulation applies to any stationary source that is a major stationary source as defined in Rule 1401(c)(26) or is subject to the acid rain provisions of Title IV of the federal Clean Air Act (CAA).

While the operation of MBC itself does not exceed federal major source thresholds, the facility is located on contiguous property of Miramar Landfill – a major source also owned and operated by the City of San Diego. Therefore, according to Rule 1401(c)(26), MBC and Miramar Landfill comprise the same major stationary source and are both subject to Title V requirements.

6.0 Potential to Emit and Actual Emissions

The following table shows the actual and potential emissions for the facility that are used to establish the major source status for Title V. For all pollutants, emissions are below major source thresholds.

| Title V Major Source Determination Tons per Year: Metro Biosolids Center Emissions | | | |
|---|------------|----------------------------|--------------|
| Pollutant | Thresholds | Facility Potential to Emit | Major Source |
| Highest Federal HAP | 10 | 0.08 | No |
| Sum of Federal HAPs | 25 | 0.35 | No |
| NOx | 100 | 1.96 | No |
| VOC | 100 | 2.49 | No |
| PM10 | 100 | 0.45 | No |
| SOx | 100 | 0.074 | No |
| CO | 100 | 0.087 | No |

Facility PTE for criteria pollutants was taken from calculations in District APCD2025-APP-008945. HAP PTE calculations were based on APCD2023-APP-008019.

| Potential to Emit Tons per Year: Miramar Landfill Emissions | | | | |
|--|------------|---------------------------|-------------------|--------------|
| Pollutant | Thresholds | Facility Actual Emissions | Potential to Emit | Major Source |
| Highest Federal HAP | 10 | 8.4 | 12.2 | Yes |
| Sum of Federal HAPs | 25 | 17.7 | 22.2 | No |
| NOx | 25 | 47.5 | 103.1 | Yes |
| VOC | 25 | 72.2 | 74.7 | Yes |
| PM10 | 100 | 11.4 | 16.4 | No |
| SOx | 100 | 8.4 | 12.1 | No |
| CO | 100 | 7.4 | 12.7 | No |

Facility emissions for Miramar Landfill (at which MBC is collocated) taken from APCD2020-APP-006545 for the renewal of that Title V permit.

7.0 40 CFR Part 64 CAM (Compliance Assurance Monitoring)

Compliance Assurance Monitoring (CAM) applicability was considered pursuant to 40 CFR Part 64 for the permitted flare. Uncontrolled potential emissions of VOC from the anaerobic digestion process can exceed the major source threshold of 25 tons per year, and utilizes a control device (flare) for control of emissions. The flare permit has federally enforceable monitoring requirements including limits for flare combustion temperatures, and a requirement that the flare is monitored continuously, and associated record keeping. This meets the exemption specified in 40 CFR 64.2(b)(1)(vi) and therefore CAM does not apply. CAM also does not apply to NOx emissions generated by the flare because there is no emissions control device, which is an applicability criteria given at §64.2(a)(2).

8.0 Applicable Requirements

This section summarizes the major types of requirements for this facility. These types of requirements include facility-wide, and permit specific applicable requirements. Additionally for each emission unit, the rule that results in the primary emission limitation is listed.

General Facility-wide Applicable Requirements

| Regulation | Rule Citation | Title |
|-----------------|----------------|---|
| SDCAPCD Reg. II | 10(a) 10(b) | Permits Required – (a) Authority to Construct Permits Required – (b) Permit to Operate |
| SDCAPCD Reg. II | 19 | Provision of Sampling & Testing Facilities |
| SDCAPCD Reg. II | 19.3 | Emission Information |
| SDCAPCD Reg. II | 20.1-20.4 | New Source Review |

| | | |
|-------------------|-------|--|
| SDCAPCD Reg. II | 21 | Permit Conditions |
| SDCAPCD Reg. II | 24 | Temporary Authority to Operate |
| SDCAPCD Reg. IV | 60 | Circumvention |
| SDCAPCD Reg. V | 98*** | Breakdown Conditions: Emergency Variance |
| SDCAPCD Reg. VI | 101 | Burning Control |
| SDCAPCD Reg. VIII | 131 | Stationary Source Curtailment Plan |

Facility-wide Prohibitory Requirements

| Regulation | Rule Citation | Title |
|---|----------------------|---|
| SDCAPCD Reg. IV | 50 | Visible Emissions |
| SDCAPCD Reg. IV | 51 | Nuisance |
| SDCAPCD Reg. IV | 52 | Particulate Matter |
| SDCAPCD Reg. IV | 53 | Specific Contaminants |
| SDCAPCD Reg. IV | 62 | Sulfur Content of Fuels |
| SDCAPCD Reg. IV | 69.2 | Boilers |
| SDCAPCD Reg. X | 40 CFR 60 Subpart A | NSPS General Provisions |
| SDCAPCD Reg. XI | 40 CFR 63 Subpart A | NESHAP General Provisions |
| SDCAPCD Reg. XII | 1200** | Toxic Air Contaminants – New Source Review |
| SDCAPCD Reg. XII | 1206* | Asbestos Removal, Renovation, and Demolition |
| 40 CFR Part 60 | Subpart III | Stationary Compression Ignition Combustion Engines |
| 40 CFR Part 60 | Subpart Dc | Steam Generators >10MM BTU<100 MM BTU |
| 40 CFR Part 61 | Subpart M* | NESHAP - Asbestos |
| California Code of Regulations (CCR) Title 17 | 93115.1** | Stationary Diesel Airborne Toxic Control Measure (ATCM) |

**District Rule 1206 is equally or more stringent than NESHAP Subpart M; however in the event of changes in either rule, the most stringent requirement applies.*

***Not federally enforceable*

****Breakdowns/variances are not recognized by EPA and cannot grant relief from federal enforcement of requirements*

Permit Specific Applicable Requirements:

| SDAPCD Permit No. | Permit Description | Applicable Rules |
|---|---------------------------|--|
| , APCD2006-PTO-972499, APCD2006-PTO-972498, APCD2006-PTO-972500 | Emergency Diesel Engines | Rules 50, 51, 52, 1200*, 20.2/20.3, 69.4.1*, 17 CCR 93115 (stationary ATCM), 40 CFR 60 Subpart ZZZZ (NESHAP) |

| | | |
|--|-------------------------|--|
| APCD2018-PTO-002990 | Portable Diesel Engines | Rules 50, 51, 52, 1200*, 20.2/20.3, 69.4.1*, 17 CCR 93116 (portable ATCM), |
| APCD2003-PTO-931028, APCD2003-PTO-931027 | Boilers | Rules 50, 51, 53, 69.2, 40 CFR 60 Dc |
| APCD2006-PTO-931030 | Digesters | Rules 50, 51, 53, 1200*, 20.2/20.3 |
| APCD2009-PTO-931032 | Sludge Processing | Rules 51, 52, 1200*, 20.2/20.3 |
| APCD2009-PTO-931031 | Wastewater Treatment | Rules 51, 1200*, 20.2/20.3 |

*Indicated rules are not federally enforceable; however, 69.4.1 has been submitted for EPA review and will become federally enforceable upon approval.

Emission Limitations

| Wastewater Treatment and Sludge Processing/Flare | |
|---|----------------------------------|
| Pollutant | Primary Limiting Regulations |
| NOx | Rule 20.2/20.3 |
| SO2 | Rules 20.2/20.3, 51, 53 |
| VOC | Rule 20.2/20.3 |
| CO | NA (no specific emission limits) |
| PM10 | Rules 20.2/20.3, 52, 53 |
| Toxic Pollutants | Rules, 51, 53 |

| Digester | |
|------------------|----------------------------------|
| Pollutant | Primary Limiting Regulations |
| NOx | Rule 20.2/20.3 |
| SO2 | Rules 20.2/20.3, 51, 53 |
| VOC | Rule 20.2/20.3 |
| CO | NA (no specific emission limits) |
| PM10 | Rules 20.2/20.3, 52, 53 |
| Toxic Pollutants | Rules, 51, 53 |

| Boilers | |
|------------------|-----------------------------------|
| Pollutant | Primary Limiting Regulations |
| NOx | Rule 20.2/20.3, 69.2 (via tuning) |
| SO2 | Rules 20.2/20.3, 51, 53 |
| VOC | Rule 20.2/20.3 |
| CO | Rule 69.2 (via tuning) |
| PM10 | Rules 20.2/20.3, 52, 53 |
| Toxic Pollutants | Rules, 51, 53 |

| Portable Diesel Engines | |
|--------------------------------|---------------------------------------|
| Pollutant | Primary Limiting Regulations |
| NOx | Rules 20.2/20.3, 69.4.1* |
| SO2 | Rule 20.3, Rule 69.4.1*, 17 CCR 93116 |
| VOC | Rule 20.3 |
| CO | Rule 69.4.1 |
| PM10 | Rules 20.2, 52, 17 CCR 93116 |
| Toxic Pollutants | Rule 1200 |

| Stationary Emergency Diesel Engines | |
|--|--------------------------------|
| Pollutant | Primary Limiting Regulations |
| NOx | Rules 20.2, 69.4.1* |
| SO2 | Rule 20.3/20.3, Rule 69.4.1**, |
| VOC | Rule 20.2/20.3 |
| CO | Rule 69.4.1* |
| PM10 | Rules 20.2, 52, 17 CCR 93115* |
| Toxic Pollutants | Rule 1200 |

*Not federally enforceable

** The District has submitted a revised version of Rule 69.4.1 for approval into the SIP which will replace 69.4 which has been repealed by the District. However, because EPA has not acted on this submittal, the current version of Rule 69.4 is still federally enforceable and Rule 69.4.1 is not.

Rule Discussion:

Rule 10a/b. Permits to Operate Required. These rules require that the facility operator obtain an Authority Construct and/or modified Permit to Operate prior to installing, modifying or operating equipment which emits air contaminants.

Rule 12. Equipment Registration. This rule contains requirements for equipment registered under the District's registration program. Registrations are similar to operating permits, but are not subject to pre-construction review/NSR and typically are only issued to emission units which are also considered insignificant activities.

Rule 19. Provision of Sampling & Testing Facilities. Specifies that facilities must provide proper access to District personnel to verify requirements and conduct any required testing.

Rule 19.3. Emission Information. This rule pertains to emission inventory information and specifies what data facilities are required to maintain or provide for the District in order to conduct state and federally required emission inventory analyses. Some of the required information is also required by emission-unit specific permit conditions, but only if necessary to determine compliance with accurate requirements.

Rule 20.1-20.4. New Source Review. These are the District's New Source Review (NSR) rules. 20.1 contains general requirements and definitions and is primarily used to define calculation methodologies, 20.2 contains requirements for non-major sources, 20.3 for major sources, and 20.4 for portable sources.

The individual operating permits and any required authority to construct for each emission unit will specify any detailed or specific requirements (e.g. BACT standards, AQIA-imposed requirements, offsets, etc.).

Rule 21 (and 1421). Permit Conditions Required. This rule allows the District to impose permit conditions to ensure enforceability of requirements. Rule 1421 mirrors rule 21 but applies specifically to Title V facilities and contains additional requirements related to ensuring continuous compliance with requirements, and forms the basis of some conditions added to the operating permits as part of the Title V renewal.

Rule 24. Temporary Authority to Operate. This rule defines the District's ability to grant temporary authority to operate under the NSR program. A separate rule (1410) covers temporary operating authority under the Title V program.

Rule 25. Permit Appeal. Outlines the requirements and process for appeals to the issuance of authorities to construct, permits to operate and modified permits to operate under the District's NSR permitting program. Decisions on permit appeals are made by the District's Hearing Board.

Rule 50. Visible Emissions. The only requirement of this rule is setting a maximum emission opacity standard that applies to all equipment. Except for some equipment which is subject to Rule 71 (abrasive blasting emission standards) and a few minor exceptions, all sources of emissions from permitted operations are subject to Rule 50. Compliance for all sources is typically ensured by operational limits or control requirements (e.g. filters) which have been evaluated to ensure that emission opacity cannot be exceeded and are specified in permit conditions as necessary.

Rule 51. Public Nuisance. The requirement of this rule is to prohibit the discharge of air contaminants or other materials in amounts that may cause harm or nuisance to people, property, or the public. This applies to all sources of emissions and is intended to protect public health, comfort, safety, and business interests. Compliance is typically ensured through proper operation and maintenance of equipment, emission controls, and process limits that prevent emissions from reaching levels that could result in nuisance or adverse impacts.

Rule 53. Specific Air Contaminants. This rule is very similar to Rule 52, except applies to certain combustion sources and includes limits on emissions of sulfur compounds in addition to particulate matter. The only source subject to this rule are the Boilers and Gas Turbine test cells, which comply with the requirements under normal operation without any restrictions.

Rule 60. Circumvention. This rule clarifies that circumvention of applicable requirements is not permissible – such as through piecemealing of projects or similar practices.

Rule 69.2. Boilers. Requires that natural gas boilers comply with various requirements including either conducting annual tuning and limiting fuel input capacity, or for boilers to meet specified emission limits for NO_x and CO and demonstrate compliance through initial and periodic source testing. Depending on the compliance pathway, the rule also requires associated monitoring and recordkeeping to demonstrate compliance.

Rule 69.4.1. Stationary Reciprocating Internal Combustion Engines. This rule applies to Stationary Reciprocating Internal Combustion Engines and sets maximum NO_x, VOC, and CO standards for

different types of engines, fuel specification requirements, control equipment requirements for some engine types, associated monitoring, inspection and maintenance frequency, and recordkeeping. The applicable requirement(s) per engine type are listed in each permit with the rule as the basis.

Rule 1200. Toxic Air Contaminants. Outlines requirements for the District's toxics new source review program, which requires new equipment and modifications to equipment to be evaluated for increases in air toxics emissions, and if necessary the requirement to conduct a health risk assessment and demonstrate that the projects meets certain limitations on increases in incremental health impacts. This rule is not federally enforceable. Any emission unit requirements issued under this rule will be specified in the individual operating permits in Appendix A.

Rule 1206/40 CFR 61 Subpart M. Asbestos. Specifies requirements for remediation of asbestos containing materials during projects such as demolition. Rule 1206 contains applicable requirements which apply to the facility. This rule is implemented as a Compliance program and requires filing of notifications prior to any demolition involving asbestos, appropriate sampling methodologies, and control requirements when asbestos is identified.

Rule 101. Open Burning. Outlines prohibitions on open burning

Rule 131. Stationary Source Curtailment Plan. Requires that facilities with emissions above certain thresholds have a plan in place to curtail emissions in the unlikely event that SDAPCD declares an emergency air quality episode.

17 CCR 93115 (Stationary Engine ATCM). Applicable requirements of the Stationary ATCM include purchasing an engine certified to EPA standards and meeting specified emission standards of the rule, installing an hour meter, conducting maintenance according to a written plan, restrictions on operating the engine for purposes other than emergency use and limited (50 hours/year) use for maintenance and testing, and maintaining records to substantiate compliance with these requirements.

17 CCR 93116 (Portable Engine ATCM). Portable engines exempt from NSPS and NESHAP requirements are subject to the California ATCM for Portable Engines Rated at 50 bhp and greater. Applicable requirements include fuel and additive standards, operative dates for certified engine types, meeting specified PM emission standards, installing an hour meter, conducting, and maintaining records to substantiate compliance with these requirements.

This facility has not previously been thoroughly reviewed for major source NESHAP applicability, so this is discussed below.

NESHAP ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. This rule applies to the existing stationary emergency engines located at this facility. Requirements for this equipment include limitations on the number of hours of operation per year for non-emergency use, annual maintenance and related recordkeeping. These requirements are specified in permit conditions.

NESHAP VVV: National Emission Standards for Hazardous Air Pollutants: Publicly Owned Treatment Works. This facility operates some equipment which is subject to this rule. However, it is an existing group 2 POTW which has no requirements under the rule other than the initial notification requirement, so no additional permit conditions are necessary to implement this rule.

NESHAP DDDDD: National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. This rule applies to the natural gas fired boilers. However, there are no additional requirements under this part other than to only burn natural gas as fuel in the boilers (they boilers are not fed any digester gas).

9.0 Permit Shield

The previous Title V permit included a permit shield granted for relief of enforcement from 40 cfr subpart Dc (NSPS for small boilers). However, upon review of the permits and conditions, this permit shield was not properly review and granted previously, but also did not serve any benefit to permittee as the only requirement of this rule, tracking natural gas fuel, was already described in permit conditions. For this reason, the permit shield requirement for NSPS subpart Dc were removed, but as noted above this should not have any impact on requirements.

10.0 Streamlining

The Permittee does not request any streamlining of permit requirements.

11.0 Updates to the Title V Permit Incorporated into this Action

There are no major changes to the permits, except rule references on each of the permits were updated/corrected, as well as corrections to the permit shield noted above.

12.0 Permit Process-Public Notification and Notice to EPA and Affected States

Before issuing the final permit, The District will provide the opportunity for review by EPA and affected states and a public notice period. Notice will be provided to the EPA electronically through the EPS and will be sent electronically to affected states and tribes. The public notice and associated documents will be provided on our website and the public notice will be published in a newspaper. The public notice contains information on how to petition EPA for review of a proposed action.

If no comments or objections are received, the District intends to promptly issue the Title V permit after conclusion of the review period. If comments are received the District will review and respond to the comments as necessary. If comments identify issues which require modification to the permit, revisions will be made and the permit either issued if the changes do not require re-review by EPA or the public, or will be re-noticed if changes are made which do require review.

13.0 Recommendations

The facility is expected to comply with all applicable requirements including those cited in the current District permit as well as those under District Rule 1401 and 40 CFR Part 70. Therefore, the recommendation of this report is for the subject renewal Title V permit to be issued following public notice, EPA review, and response to any comments.

14.0 Attachments

The following are attached:

- Application Package
- Draft Permit
- Public Notice