

# TITLE V OPERATING PERMIT STATEMENT OF BASIS

**Facility Name:** Minnesota Methane – North City, San Diego

**Title V Application Number:** APCD2018-APP-005414

**Title V Permit Number:** APCD2009-TVP-975482

**Facility ID:** APCD1996-SITE-09688

**Equipment Address:** 4949 Eastgate Mall  
San Diego, CA. 92121

**Facility Contact:** Suparna Chakladar  
**Contact Phone:** (951) 833-4153

**Permit Engineer:** Doug Erwin

## 1. Introduction/Description

This statement of basis is for a renewal Title V permit. The facility is comprised of four (4) identical landfill gas fired engines. The following table summarizes these emission units.

District Permit #	Emission Unit Description
960022, 974394, 974395, 974396	Each cogeneration engine #1-4: Caterpillar, Model 35165ITA, landfill and natural gas fired, 1342 bhp, lean burn, turbocharged, aftercooled, air/fuel controller, driving a 950 kW generator.

## 2. Federal Program Applicability

Rule 1401 - Title V (Permitting) Applicability  
Rule 1412 - Title IV (Acid Rain) Applicability

### 2.1 Title V Applicability:

Emissions of CO exceed the Title V major source threshold of 100 tons/yr. Additionally, test data from these and other similar engines in recent years have shown formaldehyde

emissions to exceed the major source threshold of 10 tons/yr of a single hazardous air pollutant (HAP).

As discussed above, the facility's PTE for CO exceeded the major source threshold with the replacement of turbines #1 and #2 in 2013. Based on limited file documents, it is understood that prior to this installation emissions remained below major source thresholds due to the aggregate capacity and emissions of the turbines. The source submitted its application for a Title V permit in 2013.

2.2 Title IV (Acid Rain) Applicability:

Title IV requirements apply to any "utility unit" as defined at 40 CFR § 72.2. The definition excludes cogeneration units, therefore this facility and these emission units are not subject to the acid rain requirements, and Title V requirements result solely due to major source emission levels for CO and HAP as discussed above.

3. Emissions Summary

<b>Emissions (tons/yr, four engines)</b>		
<b>Pollutant</b>	<b>Estimated Actual</b>	<b>PTE</b>
NO <sub>x</sub>	30.1	51.8
VOC	6.60	28.5
PM <sub>10</sub>	7.70	3.12
SO <sub>x</sub>	2.40	1.36
CO	110	156

4. Summary of Applicable Requirements

The requirements from each of the following listed rules are incorporated into the District and Title V permits accordingly.

<b>Facility-wide Requirements</b>		
<b>Regulation</b>	<b>Rule Citation</b>	<b>Title</b>
SDCAPCD Reg. II	10	Permits Required
SDCAPCD Reg. II	19	Provision of Sampling & Testing Facilities
SDCAPCD Reg. II	19.3	Emission Information
SDCAPCD Reg. II	21	Permit Conditions
SDCAPCD Reg. IV	60	Circumvention
SDCAPCD Reg. V	98	Breakdown Conditions: Emergency Variance
<b>Emission Unit Specific Requirements</b>		
SDCAPCD Reg. II	20.3	New Source Review
SDCAPCD Reg. IV	50	Visible Emissions
SDCAPCD Reg. IV	51	Nuisance

SDCAPCD Reg. IV	53	Specific Contaminants
SDCAPCD Reg. IV	62	Sulfur Content of Fuels
SDCAPCD Reg. IV	69.4	Stationary Reciprocating IC Engines - RACT
SDCAPCD Reg. IV	69.4.1	Stationary Reciprocating IC Engines - BARCT
SDCAPCD Reg. XII	1200	Toxic Air Contaminants – New Source Review
SDCAPCD Reg. II	20.3	NSR – Major Stationary Source and PSD Stationary Source (not in SIP)
SDCAPCD Reg. XIV	all	Title V Permitting
SDCAPCD Reg. XIV	1421	Title V Permit Content
NSPS	40 CFR 60 Subpart WWW	Standards of Performance for Municipal Solid Waste Facilities
NESHAP	40 CFR 63 Subpart AAAA	NESHAP – Municipal Solid Waste Landfills
NESHAP	40 CFR 63 Subpart ZZZZ	NESHAP – Stationary Reciprocating IC Engines

## 5. Monitoring, Record-keeping and Reporting

Perhaps the most notable monitoring requirement for these engines is the periodic testing provision. Also included in each of these EUs are requirements to record fuel usage and hours of operation. Semi-annual reporting is also required.

### 40 CFR Part 64 – Compliance Assurance Monitoring

Compliance Assurance Monitoring (CAM) applicability was considered in accordance with 40 CFR Part 64. The engines are not equipped with a control device and are therefore not subject to CAM based on 40 CFR § 64.2(a)(1). Additionally, none of the individual emission units generates enough emissions to reach major source thresholds.

## 6. Public Notice and EPA Review

In accordance with District Rule 1415, the District will provide notice to the public, the Environmental Protection Agency, and affected states.

## 7. Conclusions / Recommendations

The source is expected to comply with all applicable requirements, most notably those requirements cited under District Regulation XIV 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 comments, if necessary.