

Miramar Landfill
Title V Permit Renewal Application
Permit No. APCD2002-TVP-961006

San Diego County Air Pollution Control District
10124 Old Grove Road
San Diego, California 92131-1649

SCS ENGINEERS

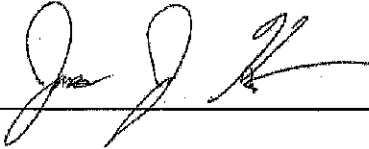
File No. 01210150.00 T9 | November 2020

3900 Kilroy Airport Way, Suite 100
Long Beach, California 90806
(562) 426-9544

This Title V permit renewal application to the San Diego County Air Pollution Control District (SDCAPCD) was prepared for the Miramar Landfill in San Diego, California. This document is dated November 2020 and was prepared and reviewed by the following:

Report Preparer:

Name & Title: James J. Kim, Project Professional

Signature:  Date: 11/13/2020

I CERTIFY THAT, TO THE BEST OF MY KNOWLEDGE AND BELIEF, THE INFORMATION PROVIDED IN THIS REPORT IS COMPLETE AND ACCURATE.

Landfill Responsible Official:

Name & Title: Renee Robertson, Deputy Director, Environmental Services Department


Signature:  Date: 11/20/20

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1.0 INTRODUCTION

On behalf of the City of San Diego (City), SCS Engineers (SCS) hereby submits a Title V permit renewal application to the San Diego County Air Pollution Control District (SDCAPCD or District) for the Miramar Landfill (Miramar) located in San Diego, California for Permit No. APCD2002-TVP-961006.

According to the permit conditions, the permittee shall submit a complete application for renewal of this permit to the Air Pollution Control Officer no later than December 4, 2020 and no earlier than June 4, 2020. The permit expiration date is December 4, 2021.

This application includes equipment/source descriptions, emissions information, Title V forms, and other details encompassing a complete Title V renewal package. The Part 70 renewal forms can be found in **Appendix A**. Other components of the application are further detailed below. This application is based on the currently permitted landfill design capacity of approximately 87,760,000 cubic yards.

2.0 GENERAL NATURE OF BUSINESS

Miramar consists of three regional landfills: north, south, and west. South Miramar Landfill (SML) began receiving waste in December 1959 and continued to receive refuse until May 1973. SML received approximately 2,500,000 tons of refuse and occupies approximately 188 acres. North Miramar Landfill (NML) began receiving waste on May 1973 and stopped receiving waste on June 1983. The Site received approximately 6,900,000 tons of waste and occupies approximately 193 acres. West Miramar Landfill (WML) is an active municipal solid waste (MSW) landfill which began accepting waste in June 1983 and receives approximately 1.1 million tons per year.

SML has a landfill gas (LFG) collection and control system (GCCS) for the control of LFG migration and emissions, which consists of a control system owned and operated by the City.

The GCCS systems associated with the North Miramar Landfill (NML) and WML are both covered under a separate Title V permit (Permit No. APCD2009-TVP-974746), as each landfill has their own control system. The LFG from the Central Blower Station (CBS), which is shared by NML and WML, is sent to the North City Compressor Station (NCCS), North Miramar Flares, and Metro Bio-Solids Center (MBC). LFG is sent to a conveyance pipeline and travels to the offsite North City Water Treatment Plant and also to a third party Fortistar plant at the MBC. The GCCS is also owned and maintained by the City.

3.0 EQUIPMENT

The majority of the ancillary activities and equipment associated with operations at SML and WML qualify as insignificant activities and have been identified in the Insignificant Activities form 1401-G.

The equipment that does not qualify as insignificant in the current Part 70 permit is listed below.

- The WML active landfill operations including quarrying, MSW disposal, waste compaction, cover operations, and haul road activities (Permit to Operate (PTO) No. 971254).
- The liners and soil covers used to contain LFG emissions at NML and WML (PTO No. 960630).
- The SML system consists of vertical and horizontal extraction wells used to collect the LFG and a plastic piping collection system used to convey the collected LFG, and a blower/flare

stations (BFS) used to destruct the collected LFG. The BFS consists of one enclosed flare rated at 19.7 Million British Thermal Units per hour (MMBtu/hr) (PTO No. 930483).

- 61.7 Horsepower (HP) Diesel Internal Combustion Engine (IC Engine) to power a material separator (PTO No. 982222).
- 131 HP Diesel IC Engine powering trommel screen (PTO No. 983949).
- 130 HP Diesel IC Engine driving wood screen (PTO No. 001898).
- 158 HP Diesel IC Engine driving electrical generator, which powers wood chip colorizer (PTO No. 001912).
- 1,050 HP Diesel IC Engine powering tub grinder (PTO No. 001913)
- 1,200 HP Diesel IC Engine powering tub grinder (PTO No. 002461).
- 1,050 HP Diesel IC Engine - Tier 4 Caterpillar model (PTO No. 002545).

4.0 COMPLIANCE ASSURANCE MONITORING (CAM)

SML incorporates a primary LFG flare as its abatement device for the GCCS. The LFG flare has a continuous monitoring system (CMS), which monitors temperature and flow. The monitoring of the LFG flare is outlined in the present Title V permit and is currently in compliance with all monitoring conditions, as is the MSW landfill. It is under these permit conditions that Miramar will continue to comply in order to fulfill requirements under 40 Code of Federal Regulations (CFR) 64. Please note that the WML also has flares and engines as its abatement devices for the GCCS; however, note that they are permitted separately from the landfill. Because the landfill is subject to the landfill New Source Performance Standards (NSPS) and complies with the NSPS monitoring requirements, it is exempt from CAM.

5.0 CHANGES TO THE EXISTING TITLE V PERMIT

The following are a list of changes that the City would like made to the existing Title V permit:

- The City would like to designate the following:
 - Renee Robertson, Deputy Environmental Services Director, as the Responsible Official
 - James Hay, Senior Mechanical Engineer of Environmental Services Department, as the Alternative Responsible Official and Facility Contact
 - Luis Campos, Senior Civil Engineer of Environmental Services Department, as the Permit Information Contact

6.0 EMISSIONS DATA

Per the United States Environmental Protection Agency (U.S. EPA) application streamlining guidance, emission information is only required when the District needs to verify emissions levels and monitoring approaches for a facility proposing Plantwide Allowable Limits (PALs) or other plantwide emissions limits, or an exemption from an emissions-based applicable requirement for a single emission unit or multiple emission units and a permit shield must be granted by the District. The City is not requesting any exemptions or changes in the limits for the currently permitted landfill collection system and the 19.7 MMBtu/hr enclosed ground flare; therefore, emission unit-specific forms are not necessary. The City and the District are currently working together to finalize the 2017 Emission Inventory for Miramar. Based upon the revisions and finalization, the City expects that several pollutants have met the major source pollutant thresholds for Title V purposes. Form 1401-

A2 summarizes Miramar’s major source applicability as determined by the 2017 Emissions Inventory and is presented in **Appendix A**.

7.0 GHG EMISSIONS

This application includes greenhouse gas (GHG) emission calculations to determine whether Prevention of Significant Deterioration (PSD) and Title V permit requirements for GHGs will apply to Miramar, if any. LFG-derived emissions of carbon dioxide (CO₂) are considered biogenic, meaning they come from a biofuel and do not contribute to a net increase in atmospheric CO₂.

On July 1, 2011, the U.S. EPA issued a rule (40 Code of Federal Regulations (CFR) Parts 51, 52, 70, and 71, Federal Register Volume 76, No. 139, pages 43490 to 43508) to defer the inclusion of biogenic CO₂ in PSD and Title V programs under the Tailoring Rule.

On July 21, 2014, the biogenic deferral expired on its own, and it has not been reinstated. However, a Supreme Court ruling on June 23, 2014 prevents any regulation of GHGs unless the source or project is major for other regulated pollutants. A facility cannot be major for GHGs alone. On July 24, 2014, U.S. EPA issued a memorandum recognizing its limitations under the Tailoring Rule and to clarify when Title V or PSD requirements for GHGs would be triggered. On November 19, 2014, U.S. EPA issued its “Framework for Assessing Biogenic CO₂ Emissions from Stationary Sources” (Framework). The Framework clearly defines biogenic CO₂ coming from MSW as having a biogenic assessment factor (BAF) of zero, meaning CO₂ from LFG is fully biogenic, part of the natural carbon cycle, and should not be regulated under the Clean Air Act (CAA). As such, biogenic CO₂ should not be counted as part of the regulated GHG emissions from a LFG source.

Methane (CH₄) and nitrous oxide (N₂O) are combustion byproducts and are GHGs. Even when resulting from the combustion of a biofuel, methane and nitrous oxide are considered anthropogenic. All GHG from combustion of fossil fuels, such as diesel and propane, are anthropogenic and must be included in the GHG emission for Title V compliance. The GHG sources at Miramar under this Title V Permit is the enclosed flare located at SML and seven (7) diesel IC engines. The enclosed flare at SML is permitted to operate at 19.7 MMBtu/hr. The total combined HP of the IC engines is 3,780.7 or 26.46 MMBtu/hr. Fugitive emissions are not considered to determine major source emission levels for GHGs and therefore not included. GHG emission factors are shown in **Table 1** below, which are derived from 40 CFR 98 Subpart C, Tables C-1 and C-2.

Table 1. GHG Emission Factors

Fuel	Emission Factors (kilograms/MMBtu)		
	Carbon Dioxide	Methane	Nitrous Oxide
LFG	52.07	3.2E-03	6.3E-04
Diesel	73.96	3.00E-03	6.00-04

Current total GHG emissions and total regulated permitted GHG emissions and their non-fugitive anthropogenic GHG emissions are provided below in **Table 2**. Fugitive emissions of GHGs are not counted under the federal CAA; therefore, fugitive LFG emissions have not been calculated for their GHG contribution. Not all GHG have equal impact on the climate, so emissions of methane and N₂O have been converted into CO₂ equivalent (CO₂e) using a global warming potential factor of 25 for

methane and 298 for N₂O. **Table 3** presents the current regulated GHG emissions, excluding biogenic GHG.

Table 2. Current Total GHG Emissions

Sources		Enclosed Flare (19.7 MMBtu/hr)	Permitted IC Engines (26.46 MMBtu/hr total)
Emissions (metric tons CO ₂ e)	CO ₂	17,989	17,146
	CH ₄	11.62	17.39
	N ₂ O	32.45	41.45
Total GHG Emissions (metric tons CO ₂ e)		18,033	17,205
Total GHG Emissions (short tons CO ₂ e)		19,878	18,965
Total GHG Emissions (short tons CO ₂ e)		38,843	

Table 3. Current Regulated GHG Emissions

Sources		Enclosed Flare (19.7 MMBtu/hr)	Permitted IC Engines (26.46 MMBtu/hr total)
Emissions (metric tons CO ₂ e)	CO ₂	0	17,146
	CH ₄	11.62	17.39
	N ₂ O	32.45	41.45
Total GHG Emissions (metric tons CO ₂ e)		44.07	17,205
Total GHG Emissions (short tons CO ₂ e)		48.58	18,965
Total GHG Emissions (short tons CO ₂ e)		19,014	

For purposes of the federal Title V rules, this facility's GHGs (excluding fugitive emissions) from the project are estimated at 19,014 tons per year (tpy) of CO₂e. Since the facility is already subject to Title V, the inclusion of this GHG inventory will satisfy the necessary requirements for adding GHGs to the Title V permit during the application process. No other requirements for GHGs should apply to this application.

Since the facility or project is not a federal major PSD source for any pollutant, the project cannot trigger PSD for GHG.

8.0 FEDERAL STATIONARY SOURCE STATUS

This facility is an existing landfill facility that is not a major stationary source under the federal New Source Review (NSR)/PSD program. Landfills are not included among the list of 28 source categories that are regulated under a 100 ton per year (tpy) threshold for "regulated NSR pollutants" to

determine “major stationary source” status, 40 CFR 52.21(b)(1)(i)(a). Because this existing landfill facility does not fall within the 28 listed categories, it is subject to a 250 tpy threshold for “regulated NSR pollutants,” excluding fugitive emissions, to determine NSR major stationary source status. Per 40 CFR 52.21(b)(1)(i)(b). This facility does not emit or have the potential to emit 250 tpy or more of a regulated NSR pollutant, and therefore, is not an existing major stationary source for PSD purposes. Therefore, this facility is considered a minor source under the federal NSR/PSD.

9.0 APPLICATION FEE ESTIMATE AND FORMS

9.1 APPLICATION FORMS

The following Title V forms are included in this application submittal and are provided in **Appendix A**.

- APCD General App1
- 1401-A1-A2
- 1401-G
- 1401-H1
- 1401-H2
- 1401-I
- 1401-K
- 1401-M
- Fees

A check for fees is submitted as part of this application. A SDCAPCD fee estimate is provided in **Appendix A**:

Estimated Total Fees: \$8,354.00

Appendix A
SDCAPCD Title V Forms/Fee Estimate

Internal Use Only	
APP ID: APCD	-APP/CER-
SITE ID: APCD	-SITE-

**GENERAL PERMIT OR
REGISTRATION
APPLICATION FORM**



Submittal of this application does not grant permission to construct or to operate equipment except as specified in Rule 24(c).

REASON FOR SUBMITTAL OF APPLICATION:

- | | | |
|--|--|---|
| <input type="checkbox"/> New Installation | <input type="checkbox"/> Existing Unpermitted Equipment or Rule 11 Change | <input type="checkbox"/> Modification of Existing Permitted Equipment |
| <input type="checkbox"/> Amendment to Existing Authority to Construct or Application | <input type="checkbox"/> Change of Equipment Location | <input type="checkbox"/> Change of Equipment Ownership <i>(please provide proof of ownership)</i> |
| <input type="checkbox"/> Change of Permit Conditions | <input type="checkbox"/> Change Permit to Operate Status to Inactive | <input type="checkbox"/> Banking Emissions |
| <input type="checkbox"/> Registration of Portable Equipment | <input checked="" type="checkbox"/> Other (Specify) <u>Title V Renewal</u> | |

List affected APP/PTO Record ID(s): 961006

APPLICANT INFORMATION

Name of Business (DBA) City of San Diego
 Does this organization own or operate any other APCD permitted equipment at this or any other adjacent locations? Yes No
 If yes, list assigned Site Record IDs listed on your Permits _____
 Name of Legal Owner (if different from DBA) _____

Equipment Owner	Authority to Construct Mailing Address
Name: <u>City of San Diego Environmental Services Department</u>	Name: _____
Mailing Address: <u>9601 Ridgehaven Ct, Ste 310</u>	Mailing Address: _____
City: <u>San Diego</u> State: <u>CA</u> Zip: <u>92123</u>	City: _____ State: _____ Zip: _____
Phone: (<u>858</u>) <u>573-1275</u>	Phone: () _____
E-Mail Address: <u>RobertsonR@sandiego.gov</u>	E-Mail Address: _____

Permit To Operate Mailing Address	Invoice Mailing Address
Name: <u>Same as above</u>	Name: <u>Same as above</u>
Mailing Address: _____	Mailing Address: _____
City: _____ State: _____ Zip: _____	City: _____ State: _____ Zip: _____
Phone: () _____	Phone: () _____
E-Mail Address: _____	E-Mail Address: _____

EQUIPMENT/PROCESS INFORMATION: Type of Equipment: Stationary Portable, *if portable please enter below the equipment storage address.* If portable, will operation exceed 12 consecutive months at the same location Yes No

Equipment Location Address 5180 Convoy Street City San Diego State: CA
 Parcel No. _____ Zip 92111 Phone () _____ E-mail: LCampos@sandiego.gov
 Site Contact Luis Campos Phone (858) 492-5035
 General Description of Equipment/Process Municipal Solid Waste Landfill

Application Submitted by Owner Operator Contractor Consultant Affiliation SCS Engineers

EXPEDITED APPLICATION PROCESSING: I hereby request Expedited Application Processing and understand that:
 a) Expedited processing will incur additional fees and permits will not be issued until the additional fees are paid in full (see Rule 40(d)(8)(iv) for details) b) Expedited processing is contingent on the availability of qualified staff c) Once engineering review has begun this request cannot be cancelled d) Expedited processing does not guarantee action by any specific date nor does it guarantee permit approval.

This application contains trade secret or confidential information (see reverse for instructions)

I hereby certify that all information provided on this application is true and correct.

SIGNATURE _____ Date 11/20/20
 Print Name Renee Robertson Company City of San Diego
 Phone (858) 573-1275 E-mail Address RobertsonR@sandiego.gov

Internal Use Only

Date _____	Staff Initials: _____	Amt Rec'd \$ _____	Fee Schedule _____
RNP: _____	EMF: _____	NBF: _____	TA: _____

GEN_APP_Form_Rev Date: Aug. 2017

**San Diego County Air Pollution Control District
10124 Old Grove Road San Diego CA 92131-1649
(858) 586-2600 FAX (858) 586-2601**

**TITLE V APPLICATION
Stationary Source Summary (FORM 1401-A1)**

Company Name City of San Diego Environmental Services Department _____	District Use Only NEDS # _____ SITE ID # _____
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I. FACILITY IDENTIFICATION

- Facility Name (if different than company name): Miramar Landfill
- Four digit SIC Code: 4953
- Parent Company (if different than Company Name): _____
- Mailing Address: 9601 Ridgehaven Ct, Ste 310
City San Diego State CA Zip 92123
- Street Address or Source Location: 5180 Convoy Street
City San Diego State CA Zip 92111
- UTM Coordinates: UTM 11S, (485907 E, 3633602 N)
- Source Located within 50 miles of a state line: Yes No (All sources **are** within 50 miles)
- Source Located within 1000 feet of a school: Yes No
- Type of Organization: Corporation Sole Ownership Government
 Partnership Utility Company
- Legal Owner's Name: City of San Diego Environmental Services Departmen
- Owner's Agent name (if any): N/A
- Responsible Official: Ms. Renee Robertson
- Plant Site Manager/Contact: Mr. Luis Campos Phone #: (858) 492-5035 FAX #: _____
- Application Contact: Gabrielle Stephens (SCS Engineers)
- Type of Facility: Active non-hazardous waste landfill site
- General description of processes/products: Handling of non-hazardous municipal solid waste for land disposal
- Is a Federal Risk Management Plan (RMP) pursuant to Section 112(r) required? Yes No
(If application is submitted after RMP due date, attach verification that plan is registered with the appropriate agency.)

II. TYPE OF PERMIT ACTION (check)	CURRENT PERMIT (permit number)	EXPIRATION (date)
<input type="checkbox"/> Initial Title V Application	N/A	N/A
<input checked="" type="checkbox"/> Permit Renewal	961006	Dec 4, 2021
<input type="checkbox"/> Significant Permit Modification		
<input type="checkbox"/> Minor Permit Modification		
<input type="checkbox"/> Administrative Amendment		

III. DESCRIPTION OF PERMIT ACTION

- Does the permit action requested involve: Temporary Source Voluntary Emissions Caps
 Acid Rain Source Alternative Operating Scenarios Abatement Devices
 CEMs Permit Shield
 Outdated SIP Requirement Streamlining Multiple Applicable Requirement Streamlining
 Source Subject to MACT Requirements [Section 112]
 Source Subject to Enhanced Monitoring (40CFR64) [Compliance Assurance Monitoring]
- Is source operating under a Compliance Schedule? Yes No Proposed
- Is source operating under a Variance Yes No (If Yes, please attach variance information)
- For permit modification, provide a general description of the proposed permit modification:

IV. SUPPLEMENTAL ATTACHMENTS*: N/A

* Means all attachments to the complete application.

**San Diego County Air Pollution Control District
10124 Old Grove Road San Diego CA 92131-1649
(858) 586-2600 FAX (858) 586-2601**

**TITLE V APPLICATION
Stationary Source Summary (FORM 1401-A2)**

Company Name <u>City of San Diego Environmental Services Department</u>	District Use Only NEDS # _____ SITE ID # _____
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I. MAJOR SOURCE APPLICABILITY

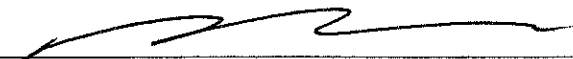
Check appropriate pollutant(s) for which you are a Major Source under Title V. Applicability is based on potential to emit. If more space is necessary, use additional forms. Please type or print legibly.

POLLUTANT	MAJOR SOURCE THRESHOLD TOTAL EMISSIONS, TPY	(check if appropriate)
VOC	100	<input checked="" type="checkbox"/>
PM ₁₀	100	<input checked="" type="checkbox"/>
SO ₂	100	<input type="checkbox"/>
NO _x	100	<input type="checkbox"/>
CO	100	<input checked="" type="checkbox"/>
ODC	100	<input type="checkbox"/>
LEAD COMPOUNDS	10	<input type="checkbox"/>
HAZARDOUS AIR POLLUTANTS		
SINGLE HAP	10	<input checked="" type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
COMBINATION HAP	25	<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

Attach all necessary calculations to this form as applicable. NOTE: Calculations are only needed if no Emission Inventory is on file with the District

Reference 2017 Emission Inventory Report

Inventory Year 2017



Signature of Responsible Official

11/20/20

Date

Ms. Renee Robertson

Print Name of Responsible Official
Deputy Director

Title of Responsible Official

(858) 573-1275

Telephone No. of Responsible Official

II. EMISSIONS CALCULATIONS ATTACHED (as needed)

Yes No

DISTRICT USE ONLY

Date Application Received: _____

Application # _____

Application Filing Fee: _____

District Received Stamp: _____

Receipt #: _____

Fee Code: _____

San Diego County Air Pollution Control District
10124 Old Grove Rd., San Diego, CA 92131
(858) 586-2600 FAX (858) 586-2601

TITLE V APPLICATION Insignificant Activity List (FORM 1401-G)
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Company Name <u>City of San Diego Environmental Services Department</u> Facility Address: <u>5180 Convoy Street, San Diego, CA 92111</u>	<b style="color: red;">District Use Only NEDS # _____ SITE ID # _____
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LIST OF EQUIPMENT – INSIGNIFICANT ACTIVITIES

Place a check mark in the appropriate box for equipment that is considered an insignificant activity based on throughput or equipment capacity.

Exemptions based on Size (Capacity)

<u>(Condensed Language of Rule)</u>	<u>Appendix A Citation</u>
<input checked="" type="checkbox"/> Stationary & portable internal combustion engines with ≤ 50 bhp output rating	(d)(1)(iii)
<input type="checkbox"/> Stationary gas turbines with a power rating of < 0.3 megawatt (MW) or a maximum gross heat input rating of 1 million BTUs per hour	(d)(1)(iv)
<input type="checkbox"/> Water cooling towers & ponds with a capacity $< 10,000$ gal/min not used for evaporative cooling of process water or not used for evaporative cooling of water, contaminated water or industrial waste water from barometric jets or from barometric condensers.	(d)(2)
<input type="checkbox"/> Fuel-burning equipment with a maximum gross heat input rate of < 1 million Btu/hour when not part of a process, process line, line, equipment, article, machine or other contrivance for which a permit to operate is required by these Rules and Regulations	(d)(4)(i)
<input type="checkbox"/> Fuel burning equipment with a maximum gross heat input of < 20 million Btu/hour, and fired exclusively with natural gas and/or liquefied petroleum gas	(d)(4)(ii)
<input type="checkbox"/> Steam boilers, process heaters, and steam generators with a maximum gross heat input of < 5 million Btu/hour	(d)(4)(iii)
<input type="checkbox"/> Crucible-type or pot-type furnaces with a brimful capacity of < 450 in ³ of any molten metal	(d)(12)
<input type="checkbox"/> Crucible, pot or induction furnaces with a capacity of ≤ 2500 in ³ , in which no sweating or distilling is conducted and from which only non-ferrous metals except yellow brass, are poured or non-ferrous metals are held in a molten state	(d)(13)
<input type="checkbox"/> Dry batch mixers with ≤ 0.5 cubic yards rated working capacity	(d)(27)
<input type="checkbox"/> Batch mixers (wet) with ≤ 1 cubic yard capacity where no organic solvents, diluents or thinners are used.	(d)(28)
<input type="checkbox"/> Roofing kettles (used to heat asphalt) with a capacity of ≤ 85 gallons	(d)(33)
<input type="checkbox"/> Abrasive blasting equipment with a manufacturer's-rated sand capacity of < 100 lbs or < 1 ft ³	(d)(34)
<input type="checkbox"/> Paper shredders and paper disintegrators that have a capacity of 600 pounds per hour or less, and the associated conveying systems and baling equipment.	(d)(41)
<input type="checkbox"/> Ovens having an internal volume of ≤ 27 ft ³ in which organic solvents or materials containing organic solvents are charged	(d)(59)
<input type="checkbox"/> Cold solvent cleaning tanks, vapor degreasers, and paint stripping tanks with a liquid surface area of ≤ 1.0 ft ²	(d)(61)(i)
<input type="checkbox"/> Cold solvent cleaning tanks, vapor degreasers, and paint stripping tanks which have a maximum capacity of ≤ 1 gallon	(d)(61)(ii)

TITLE V APPLICATION
Insignificant Activity List (FORM 1401-G)

Continued - Exemptions based on Size (Capacity)

<u>(Condensed Language of Rule)</u>	<u>Appendix A Citation</u>
<input checked="" type="checkbox"/> Stationary organic compound storage tanks with a capacity of ≤ 250 gallons	(e)(1)
<input type="checkbox"/> Liquid surface coating application operations using hand-held brushes for application of a primer coating from containers of \leq eight (8) ounces in size, to fasteners to be installed on aerospace parts	(h)(5)
<input type="checkbox"/> Liquid surface coating application operations using air brushes with a coating capacity of ≤ 2 ounces for the application of a stencil coating	(h)(6)
<input type="checkbox"/> Metal inspection tanks that: a) do not utilize a suspension of magnetic or fluorescent dye particles in volatile organic solvent, and b) have a liquid surface area $< 5 \text{ ft}^2$ and c) are not equipped with spray type flow or a means of solvent agitation	(o)(5)
<input type="checkbox"/> Bakery ovens used for baking yeast leavened products where the combined rated heat input capacity is < 2 million Btu/hr	(o)(37)

Exemptions based on Production Rates (Emission Limits)

<input type="checkbox"/> Printing or graphic arts presses located at a stationary source which emits a total of < 15 lbs/day of VOC's subject to Rule 67.16, on each day of operation	(d)(7)
<input type="checkbox"/> Solder levelers, hydrosqueegees, wave solder machines, and drag solder machines which use < 10 lbs/day of any material containing VOCs	(d)(23)
<input type="checkbox"/> Fire extinguishing equipment, using halons with a charge of < 50 lbs. of a Class I or Class II ozone depleting compound.	(d)(31)
<input type="checkbox"/> Coffee roasting equipment with a manufacturer's rating of ≤ 15 lbs/hr	(d)(45)
<input type="checkbox"/> Equipment used to manufacture bio-agricultural products for exclusive use in field testing required to obtain FDA, EPA, USDA and /or Cal-EPA approval, provided the uncontrolled emissions of VOCs from all such operations < 5 ton/yr.	(d)(49)(iii)
<input type="checkbox"/> Oil quenching tanks which use < 20 gal/yr of make-up oil	(d)(56)
<input type="checkbox"/> Equipment that is used to conduct research and develop new or improved processes/products, and is operated by technically trained personnel under the supervision of a research director, and is not used in the manufacture of products for sale or exchange for commercial profit, and all emissions are < 15 lbs/day.	(d)(48)
<input type="checkbox"/> Powder coating operations, except metalizing gun operations, where surface preparation or cleaning solvent usage is < 0.5 gal/day	(d)(62)
<input type="checkbox"/> Equipment used to transfer fuel to & from amphibious ships for maintenance purposes, provided total annual transfers $< 60,000$ gal/yr.	(f)(2)
<input type="checkbox"/> Stationary storage tanks (excluding tanks subject to Rule 61.9) used exclusively for the storage of liquid organic solvents used as dissolvers, viscosity reducers, reactants, extractants, cleaning agents or thinners provided that emissions < 15 lbs/day.	(e)(3)
<input type="checkbox"/> Liquid surface coating or adhesive application operations (portable or stationary) where not more than 20 gallons per year of material containing organic compounds are applied	(h)(1)
<input type="checkbox"/> Liquid surface coating application operations exclusively using materials with a VOC content of < 20 g/L where < 30 gal/day of such materials are applied.	(h)(2)
<input type="checkbox"/> Foam manufacturing or application operations which emit < 5 lbs/day of VOCs	(i)(1)
<input type="checkbox"/> Reinforced plastic fabrication operations using resins such as epoxy and/or polyester which emit < 5 lbs/day of VOCs	(i)(2)
<input type="checkbox"/> Plastics manufacturing or fabrication operations which emit < 5 lbs/day of VOCs	(i)(3)
<input type="checkbox"/> Cold solvent degreasers used for educational purpose and which emit < 5 lbs/day of VOCs	(i)(4)

TITLE V APPLICATION
Insignificant Activity List (FORM 1401-G)

- Golf grip application stations which exclusively use liquid materials with an initial boiling point of 450°F (232°C), or greater and which emit < 5 lbs/day of VOCs. (i)(5)
- Batch-type waste-solvent recovery stills with batch capacity of ≤ 7.5 gallons for onsite recovery provided the still is equipped with a safety device & VOC emissions are < 5 lbs/day (i)(6)
- Peptide and DNA synthesis operations which emit < 5 lbs/day of VOCs (i)(7)
- Equipment used for washing or drying articles fabricated from metal, cloth, fabric or glass, provided that no organic solvent is employed in the process and that no oil or solid fuel is burned and none of the products being cleaned has residues of organic solvent and VOC emissions are <5 lbs/day (i)(8)
- Hot wire cutting of expanded polystyrene foam which emit < 5 lbs/day of VOCs. (i)(9)
- Any coating and/or ink manufacturing operations located at a stationary source, which emit < 15 lbs/day of VOCs. (o)(9)
- Any operation producing materials for use in cosmetic or pharmaceutical products and/or manufacturing cosmetic or pharmaceutical products by chemical processes, which emit < 15 lbs/day of VOCs (o)(12)
- Refrigeration units except those used as, or with, air pollution control equipment with a charge of < 50 lbs of a Class I or II ozone depleting compound. (o)(18)
- Atmospheric organic gas sterilizer cabinets where ethylene oxide emissions are < 5 lbs/yr (o)(28)
- Aerosol can puncturing/crushing operations which vents all emissions through a properly operated/maintained carbon canister, provided < 500 cans/day are processed. (o)(29)(ii)
- Solvent wipe cleaning operations using a container applicator that minimizes emissions to the air where the uncontrolled emissions of VOCs < 5 ton/yr, or the total purchase of solvents < 1,500 gal/yr, or the total purchase of solvents containing a single HAP < 350 gal/yr. (o)(32)
- Equipment approved for use by the EPA for recovering and/or recycling CFCs provided such equipment is charged with < 50 lbs. of a Class I or II ozone depleting compound. (o)(33)
- Stationary IC engines rated at ≤ 200 bhp installed and operated before November 15, 2000, which operate < 200 hr/yr. (o)(34)(ii)

TITLE V APPLICATION
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Enclosed Flare	Diesel Engines													Future Effective Date
Equipment Specific Applicable Requirement Description																			
50	Visible Emissions			x	x	x													
51	Nuisance			x	x	x													
52	Particulate Matter	Method 5		x	x	x													
53	Specific Contaminants	Method 5																	
53.1	Scavenger Plants																		
54	Dust and Fumes	Method 5																	
58	Incinerator Burning																		
59	Control of Waste Disposal – Site Emissions	(e)	(e) & (f)	x	x														
60	Circumvention			x	x	x													
61.1	Receiving & Storing VOCs at Bulk Plants & Terminals	(d)	(c)(7)																
61.2	Transfer of VOCs into Mobil Transport Tanks	(c)(10)																	
61.3	Transfer of VOCs into Stationary Storage Tanks		(c)(2)(iii)																
61.4	Transfer of VOCs into Vehicle Fuel Tanks																		
61.5	Visible Emissions Standards for Vapor Control Equip.		VE																
61.7	Spillage & Leakage of VOCs																		
61.8	Certification Requirements for Vapor Control Equip.																		
62	Sulfur Content of Fuels				x	x													
64	Reduction of Animal Matter																		
66	Organic Solvents	(p)	(o)																
67.1	Alternative Emission Control Plans (AECPP)	(c)	(d)																
67.2	Dry Cleaning - Petroleum Solvent	(f)	(e)																
67.3	Metal Parts Coating	(g)	(f)																
67.4	Can & Coil Coating	(g)	(f)																
67.5	Paper, Film and Fabric Coating	(f)	(e)																
67.6	Solvent Cleaning Operation	(f)																	
67.7	Cutback & Emulsified Asphalt	(f)	(e)																
67.9	Aerospace Coating Operations	(g)	(f)																
67.10	Kelp Processing and Bio-Polymer Mfg.	(f)	(e)																
67.11	Wood Products Coating Operations (not in SIP)																		

TITLE V APPLICATION
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Enclosed Flare	Diesel Engines												Future Effective Date
67.12	Polyester Resin Operations	(g)	(f)															
67.15	Pharmaceutical & Cosmetic Manufacturing	(e)																
67.16	Graphic Arts Operations	(g)	(f)															
67.17	Open VOC Containers	(e)		x														
67.18	Marine Coating Operations	(g)	(f)															
67.19	Coating and Printing Inks Mfg. Operations	(g)	(f)															
67.20	Motor Vehicle & Mobile Equipment Refinishing Operations																	
67.21	Adhesive Material Application Operations																	
67.22	Expandable Polystyrene Foam Products Manufacturing Operations (not in SIP)																	
67.24	Bakery Ovens	(f)	(e)															
68	Fuel Burning Equipment - NOx				x	x												
69.2	Boilers	(f)	(e) & (g)															
69.3	Stationary Gas Turbine Engines - RACT	(f)	(e) & (g)															
69.3.1	Stationary Gas Turbine Engines – BARCT (not in SIP)	(f)	(e) & (g)															
69.4	Stationary Internal Combustion Engines - RACT	(f)	(e)			x												
69.4.1	Stationary Internal Combustion Engines – BARCT (not in SIP)	(f)	(e)			x												
70	Orchard Heaters																	
71	Abrasive Blasting			x														
20.1	Applicability, Definitions, Emission Calculations, Emission Offsets and Banking, Exemptions, and Other Requirements (SIP Version 7/5/79)			x	x	x												
20.1	NSR - General Provisions (Version 11/4/98) (not in SIP)			x	x	x												
20.2	Standards for Authority to Construct Best Available Control Technology (SIP Version 7/5/79)			x	x	x												
20.2	NSR – Non-major Stationary Sources (Version 11/4/98) (not in SIP)			x	x	x												
20.3	Standards for Authority to Construct - Air Quality Analysis (SIP Version 7/5/79)																	

TITLE V APPLICATION
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Enclosed Flare	Diesel Engines													Future Effective Date
20.3	NSR – Major Stationary Source and PSD Stationary Source (Version 11/4/98) (not in SIP)																		
20.4	Standards for Authority to Construct - Major Sources (SIP Version 7/5/79)																		
20.4	NSR – Portable Emission Units (Version 11/4/98) (not in SIP)																		
20.5	Power Plants (SIP Version 7/5/79)																		
20.6	Standards for Permit to Operate Air Quality Analysis (SIP Version 7/5/79)																		
SUBPART	Regulation X - Standards of Performance for New Stationary Sources (NSPS)	Rule #	Rule #																
A	General Provisions		260.7 260.13	x	x	x													
D	Standards of Performance for Fossil-Fuel Fired Steam Generators	260.46	260.45																
Da	Standards of Performance for Electric Utility Steam Generating Units Constructed After September 18, 1978		260.47a 260.48a 260.49a																
Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating	260.45b 260.46b	260.47b 260.48b 260.49b																
E	Standards of Performance for Incinerators	260.54	260.53																
I	Standards of Performance for Asphalt Concrete Plants	260.93																	
K	Standards of Performance for Storage Vessels for Petroleum Liquids Constructed after June 11, 1973 and Prior to May 19, 1978		260.113																
Ka	Standards of Performance for Storage Vessels for Petroleum Liquids Constructed after May 18, 1978	260.113a	260.115a																
Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984	260.113b	260.115b 260.116b																

TITLE V APPLICATION
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Enclosed Flare	Diesel Engines												Future Effective Date
Subpart																		
L	Standards of Performance for Secondary Lead Smelters	260.123																
M	Standards of Performance for Secondary Brass and Bronze Ingot Production Plants	260.133																
O	Standards of Performance for Sewage Treatment Plants	260.154	260.153															
DD	Standards of Performance for Grain Elevators	260.303																
EE	Standards of Performance for Surface Coating Metal Furniture	260.313	260.314															
		260.316	260.315															
GG	Standards of Performance for Stationary Gas Turbines	260.335	260.334															
QQ	Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing	260.433 260.435	260.434															
RR	Standards of Performance for the Pressure Sensitive Tape and Label Surface Coating Operations	260.444	260.445															
		260.446	260.447															
SS	Standard of Performance for the Industrial Surface Coating Large Appliances	260.453	260.454															
		260.456	260.455															
TT	Standards of Performance for Metal Coil Surface Coating	260.463	260.464															
		260.466	260.465															
BBB	Standards of Performance for the Rubber Tire Manufacturing Industry	260.543	260.544															
		260.547	260.545															
FFF	Standards of Performance for Flexible Vinyl and Urethane Coating and Printing	260.583	260.584 260.585															
JJJ	Standards of Performance for Petroleum Dry Cleaners																	
SUBPART	New Source Performance Standards (40 CFR 60)																	
Cb, F	Portland Cement Plants																	
Dc	Small Industrial -Commercial -Institutional Steam Generators >10 MM Btu but <100 MM Btu.																	
Ea	Municipal Waste Combustors																	
G	Nitric Acid Plants																	
H & Cb	Sulfuric Acid Plants																	

TITLE V APPLICATION
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Enclosed Flare	Diesel Engines												Future Effective Date
Subpart																		
N	Oxygen Process Furnaces																	
Na	Oxygen Process Steelmaking Facilities																	
P	Primary Copper Smelters																	
Q	Primary Zinc Smelters																	
R	Primary Lead Smelters																	
S	Primary Aluminum Reduction Plants																	
T & U	Phosphate Fertilizer Industry																	
V,W,X	Phosphate Fertilizer Industry																	
Y	Coal Preparation Plants																	
Z	Ferroalloy Production Facilities																	
AA, AAa	Steel Plants																	
BB	Kraft Pulp Mills																	
CC	Glass Manufacturing Plants																	
HH	Lime Manufacturing Plants																	
KK	Lead-Acid Battery Manufacturing Plants																	
LL	Metallic Mineral Processing Plants																	
MM	Automobile and Light-Duty Truck Surface Coating Operations																	
NN	Phosphate Rock Plants																	
PP	Ammonium Sulfate Manufacture																	
UU	Asphalt Processing and Asphalt Roofing Manufacture																	
VV	Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry.																	
WW	Beverage Can Surface Coating Industry																	
XX	Bulk Gasoline Terminals																	
AAA	New Residential Wood Heaters																	
DDD	VOC Emissions from the Polymer Mfg. Ind.																	
GGG	Equipment Leaks of VOC in Petroleum Refineries.																	

TITLE V APPLICATION
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Enclosed Flare	Diesel Engines												Future Effective Date
Subpart																		
HHH	Synthetic Fiber Production Facilities																	
KKK, LLL	Onshore Natural Gas Processing: VOC Equipment Leaks and SO ₂ Emissions.																	
HHH	Synthetic Fiber Production Facilities																	
KKK, LLL	Onshore Natural Gas Processing: VOC Equipment Leaks and SO ₂ Emissions.																	
NNN	VOC Emissions from Synthetic Organic Chemical Manufacturing Industry Distillation Operations.																	
OOO	Standard of Performance for Nonmetallic Mineral Processing Plants																	
PPP	Wool Fiberglass Insulation Mfg. Plants																	
QQQ	VOC Emissions from Petroleum Refinery Wastewater Systems.																	
RRR	VOC Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes.																	
SSS	Magnetic Tape Coating Facilities																	
TTT	Industrial Surface Coating Surface, Surface Coating of Plastic Parts for Business Machines.																	
UUU	Calciners and Dryers in Mineral Industries.																	
VVV	Polymeric Coating of Supporting Substances Facilities.																	
WWW	Standards of Performance for Municipal Solid Waste Facilities			x	x													
REGULATION XI - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS)																		
SUBPART																		
A	General Provisions			x	x													
C, D	Beryllium Extraction Plants; Ceramic Plants, Foundries, Incinerators, Propellant Plants, and Machine Shops that Process Beryllium Containing Material; and Rocket Motor Firing Test Sites.																	

TITLE V APPLICATION
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Enclosed Flare	Diesel Engines													Future Effective Date
Subpart																			
E	Mercury Ore Processing; Manufacturing Processes Using Mercury Chloralkali Cells; and Sludge Incinerators.																		
F	Ethylene Dichloride Mfg. Via Oxygen, HCl and Ethylene; Vinyl Chloride Mfg.; and Polyvinyl Chloride Mfg.																		
M	Asbestos Mills; Roadway Surfacing with Asbestos Tailings; Manufacture of Products Containing Asbestos; Demolition; Renovation; and Spraying and Disposal of Asbestos Waste.																		
SUBPART NESHAPS (40 CFR 61)																			
B,Q,R, T,W,	Underground Uranium Mines; Dept. of Energy Facilities; Phosphorus Fertilizer Plants; & Facilities Processing or Disposing of Uranium Ore & Tailings.																		
H,I,K	Dept. of Energy; Nuclear Regulatory Commission Licensed Facilities; Other Federal Facilities; and Elemental Phosphorus Plants. (Radionuclide)																		
J,L,Y, BB,FF	Fugitive Process, Storage, and Transfer Equipment Leaks; Coke By-Product Recovery Plants; Benzene Storage Vessels; Benzene Transfer Operations; and Benzene Waste Operations.																		
N,O,P	Glass Manufacturer; Primary Copper Smelter; Arsenic Trioxide and Metallic Arsenic Production Facilities.																		
V	Pumps, Compressors, Pressure Relief Devices, Connections, Valves, Lines, Flanges, Product Accumulator Vessels, etc. in VHAP Service.																		
SUBPART MACT Standards (40 CFR 63)																			
F,G, H,I	Amendment: Reopening, Averaging Issue																		
L	Coke Ovens																		
O	Ethylene Oxide Sterilizers																		
Q	Industrial Process Cooling Towers																		
R	Gasoline Distribution Facilities																		

TITLE V APPLICATION
Applicable Requirements Summary Checklist (FORM 1401-H1) - continued

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Enclosed Flare	Diesel Engines														Future Effective Date
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Subpart

T	Halogenated Solvent Cleaning Degreasing																			
X	Secondary Lead Smelters																			
Y	Marine Tank Loading/Unloading																			
CC	Petroleum Refineries																			
DD	Off-Site Waste and Recovery Operations																			
EE	Magnetic Tape																			
GG	Aerospace (Coatings)																			
II	Shipbuilding for Ship Repair (Surface Coating)																			
JJ	Wood Furniture Industry (Coatings)																			
KK	Printing and Publishing																			
AAAA	Municipal Solid Waste Landfills			x	x															
DDDDD	Industrial, Commercial and Institutional Boilers and Process Heaters																			
MMMM	Surface Coating of Miscellaneous Metal Parts and Products																			
PPPP	Surface Coating of Plastic Parts																			
ZZZZ	Reciprocating Internal Combustion Engines					x														
YYYY	Stationary Combustion Turbines																			

**California Airborne Toxic Control Measures (ATCM)
17 CCR**

§93102	Hexavalent Chromium ATCM for Chrome Plating and Chromic Acid Anodizing Operations																			
§93109	ATCM for Emissions of Perchloroethylene from Dry Cleaning Operations																			

40 CFR Part 68 RMP

Title IV - Acid Rain (40 CFR 72)

Title VI-Ozone Depleting Compounds (40 CFR 82)

B	Servicing of Motor Vehicle Air Conditioners	B		x																
F	Servicing of Other Air Conditioners	F		x																


**San Diego County Air Pollution Control District
 10124 Old Grove Road San Diego CA 92131-1649
 (858) 586-2600 FAX (858) 586-2601**

**TITLE V APPLICATION
 Certification Statement (FORM 1401-I)**

Company Name	District Use Only
<u>City of San Diego Environmental Services Department</u>	NEDS # _____
Facility Address: <u>5180 Convoy Street, San Diego, CA 92111</u>	SITE ID # _____

Under penalty of perjury, identify the following: (Read each statement carefully and check each box for confirmation.)

- | Applicable | Not
Applicable | |
|-------------------------------------|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <i>Based on information and belief formed after reasonable inquiry, the source(s) identified in this application will continue to comply with the applicable requirement with which the source is in compliance. The applicable requirement(s) with which the source(s) is/are not in compliance is/are identified in Form 1401-L, Schedule of Compliance.</i> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <i>Based on information and belief formed after reasonable inquiry, the source(s) identified in this application will comply with the future-effective applicable requirement(s) on a timely basis.</i> |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <i>Based on information and belief formed after reasonable inquiry, the source(s) identified in the Schedule of Compliance application form that is/are not in compliance with the applicable requirement(s), will comply in accordance with the attached compliance plan schedule.</i> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <i>Based on information and belief formed after reasonable inquiry, information on application forms, referenced documents, all accompanying reports, and other required certifications are true, accurate, and complete.</i> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <i>All fees required by Regulation III, Rule 40 have been paid.</i> |


 Signature of Responsible Official

Renee Robertson
 Print Name of Responsible Official

Deputy Director
 Title of Responsible Official

11/20/20
 Date

(858) 573-1275
 Telephone No. of Responsible Official

